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March 30, 2020

VIA E-MAIL (CDELEHANTY@DMUSD.ORG)

Chris Delehanty
Executive Director of Capital Programs and
Technology
Del Mar Union School District
11232 El Camino Real
San Diego, CA 92130

Re: Comments on Del Mar Heights School Rebuild Project Initial Study/Mitigated
Negative Declaration

Dear Del Mar Union School District Board of Trustees:

We represent Save the Field, a California nonprofit public benefit corporation, comprising numerous neighbors and citizens in connection with their concerns regarding the Del Mar Heights School estimated \$44,849,703 Rebuild Project (the "Rebuild Project"). The purpose of this letter is to provide comments to the February 20, 2020 Initial Study and Mitigated Negative Declaration ("MND") for the Del Mar Heights Elementary School (the "School") Rebuild Project circulated by the Del Mar Union School District (the "District").

I. THE DISTRICT'S INITIAL STUDY/MND FAILS TO COMPLY WITH CEQA

a. Background Regarding Purpose and Intent of CEQA

The purpose of the California Environmental Quality Act ("CEQA") (Public Resources Code section 21000 *et seq.* and the CEQA Guidelines, California Code of Regulations, title 14, section 15000 *et seq.* ("Guidelines")) "is to inform the public and its responsible officials of the environmental consequences of their decisions *before* they are made." (See *Protect Niles v. City of Fremont* (2018) 25 Cal.App.5th 1129, 1138 [Emphasis in original].) "To this end, public participation is 'an essential part of the CEQA process.'" (*Ibid* [quoting Guidelines, § 15201].)

CEQA's purposes are designed to (1) inform governmental decision makers and the public about the potential, significant environmental effects of a proposed project, (2) identify ways to avoid or significantly reduce environmental damage, (3) prevent significant, avoidable damage to the environment by requiring changes to a project that use alternatives or mitigation measures and (4)

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disclose to the public the reasons why a governmental agency approved a project in the manner it chose if significant environmental effects are present. (Guidelines, § 15002; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1996) 42 Cal.App.4th 608, 614.) The provisions of CEQA are interpreted “to afford the most thorough possible protection to the environment that fits reasonably within the scope of its text.” (*California Building Industry Association v. Bay Area Air Quality Management District* (2015) 62 Cal.4th 369, 381.)

b. Standard of Review for IS/MND under CEQA

“In reviewing an agency’s decision to adopt an MND, a court . . . must determine whether there is substantial evidence in the record to support a ‘fair argument’ that a proposed project may have a significant effect on the environment.” (*Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 575-576.) “The fair argument standard creates a ‘low threshold’ for requiring an EIR, reflecting a legislative preference for resolving doubts in favor of environmental review.” (*Ibid.*; *Sierra Club v. County of Sonoma* (1992) 6 Cal.App.4th 1307, 1316-1317.) “[C]ourts owe no deference to the lead agency’s determination. Review is de novo, with a preference for resolving doubts in favor of environmental review.” (*Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928 [Emphasis in original].)

A mitigated negative declaration may be adopted only if the record shows that there is *no substantial evidence* that the project may have a significant effect on the environment. (See Guidelines, § 15070(b)(2); *Keep Our Mountains Quiet v. County of Santa Clara* (2015) 236 Cal.App.4th 714, 730.) Substantial evidence “means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached.” (Guidelines, § 15384.) Substantial evidence includes “facts, reasonable assumptions predicated upon facts, and expert opinion supported by fact.” (*Ibid.*) “Relevant personal observations of area residents on nontechnical subjects may qualify as substantial evidence.” (*Keep Our Mountains Quiet v. County of Santa Clara, supra*, 236 Cal.App.4th at 730; *Pocket Protectors v. City of Sacramento, supra*, 124 Cal.App.4th at 928.)

c. CEQA Recirculation Requirements for IS/MND

A mitigated negative declaration must be recirculated if it has been “substantially revised” after public comment. (Guidelines, § 15073.5(a).) Substantial revisions include (1) the identification of new, avoidable significant effects for which mitigation or project revisions are required to reduce the effects, or (2) a finding that previously identified mitigation measures or project revisions will not reduce potentially significant impacts to a level of insignificance and that new mitigation measures or project revisions are required. (Guidelines, § 15073.5(b).)

As will be discussed, the Initial Study/MND for the Rebuild Project violates the minimum standards of adequacy under CEQA. As a result, the District must prepare and circulate an Environmental Impact Report before approving the Rebuild Project. Alternatively, at a minimum, the MND must be recirculated.

II. THE INITIAL STUDY/MND FAILS TO PROVIDE AN ADEQUATE DESCRIPTION OF THE PROJECT

An initial study must contain (1) “[a] description of the project including the location of the project;” and (2) “[a]n identification of the environmental setting.” (Guidelines, § 15063(d).) “An accurate and complete project description is necessary for an intelligent evaluation of the potential environmental impacts of the agency’s decision.” (*City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398, 406.) “Only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal . . . and weigh other alternatives in the balance.” (*Ibid* [quoting *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 192-193].)

“Where an agency fails to provide an accurate project description, or fails to gather information and undertake an adequate environmental analysis in its initial study, a negative declaration is inappropriate.” (*Lighthouse Field Beach Rescue v. City of Santa Cruz* (2005) 131 Cal.App.4th 1170, 1202 [quoting *El Dorado County Taxpayers for Quality Growth v. County of El Dorado* (2004) 122 Cal.App.4th 1591, 1597].) A project description that hides important project ramifications “frustrates one of the core goals of CEQA.” (*Santiago County Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 830.)

a. The Initial Study/MND Fails to Identify that the Project is in the Coastal Zone

The Initial Study/MND omits the critical fact that the Rebuild Project is located within the City of San Diego’s Coastal Overlay Zone. (See San Diego Municipal Code (“SDMC”), § 132.0402; see also Exhibit A enclosed herewith.) In fact, the Notice of Completion & Environmental Document Transmittal submitted to the State Clearinghouse clearly indicates the fact that the Initial Study/MND did not consider the fact that the Rebuild Project is located within a coastal zone when performing its analysis. (See Exhibit A.)

The California Coastal Act “was enacted by the Legislature as a comprehensive scheme to govern land use planning for the entire coastal zone of California.” (*Citizens for South Bay Coastal Access v. City of San Diego* (2020) 45 Cal.App.5th 295.) Specifically, the Legislature found that,

[T]he California coastal zone is a distinct and valuable natural resource of vital and enduring interest to all the people; that the permanent protection of the state’s natural and scenic resources is a paramount concern; that it is necessary to protect the ecological balance of the coastal zone and that existing developed uses, and future developments that are carefully planned and developed consistent with the policies of this division, are essential to the economic and social well-being of the people of this state.

(*Ibid* [quoting Pub. Resources Code, § 30001].)

Project impacts are to be measured against the project description and the existing conditions on the site. (See *Save Our Peninsula Commission v. Monterey County Bd. of Supervisors* (2001) 87 Cal.App.4th 99, 125.) It is critical that the environmental impacts of the Rebuild Project

be measured against an accurate project description—one that takes into account the property’s location in the distinct and valuable coastal zone. The failure to take this into account when measuring the potential environmental impacts of the Rebuild Project is fatal to the Initial Study/MND and Rebuild Project’s potential impacts to the environment must be reevaluated with this baseline.

“[I]f a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency *shall* prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect.” (Guidelines, § 15064(f)(1) [Emphasis added].) “The fair argument standard creates a ‘low threshold’ for requiring an EIR, reflecting a legislative preference for resolving doubts in favor of environmental review.” (*Preserve Poway v. City of Poway* (2016) 245 Cal.App.4th 560, 576.)

If any aspect of a project may result in a significant impact on the environment, an EIR must be prepared even if the overall effect of the project is beneficial. (Guidelines, § 15063(b)(1); see *County Sanitation District No. 2 v. County of Kern* (2005) 127 Cal.App.4th 1544, 1580.) A MND is inadequate if an agency fails to perform a sufficient analysis of potential environmental effects. (See *City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398, 408 [stating, “The agency should not be allowed to hid behind its own failure to gather relevant data,” quoting *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311].)

b. The Initial Study/MND Fails to Adequately Disclose the Scope of the Rebuild Project

The Initial Study/MND fails to adequately disclose the true scope of the Rebuild Project by incorrectly stating the new school’s capacity. Under the Project Description section of the Initial Study, the Initial Study states “[t]he capacity [of the school] will be reduced by one classroom (approximately 24 students) . . . Under the proposed project, the number of classrooms would be reduced by one, from 22 classrooms to 21 classrooms; the number of specialty classrooms, 13, would remain unchanged.” With 21 classrooms of approximately 24 students each, the total capacity of the Rebuild Project would be approximately 504 students. However, the plans for the Rebuild Project that were submitted to the California Division of the State Architect (“DSA”) state that the total capacity of the new school is 673 students.

By failing to adequately disclose the total capacity of the new school, the analysis in the Initial Study/MND fails to make a proper comparison between the existing physical conditions of the project with the conditions expected to be produced by the project—impacts resulting from 673 students attending Del Mar Heights Elementary School. (See *Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310, 328.) “Without such a comparison, the [environmental review] will not inform decision makers and the public of the project’s significant environmental impacts, as CEQA mandates.” (*Ibid.*) Analyzing project impacts based on a total capacity of 504 students (169 students less than the actual capacity of the Rebuild Project) fails to adequately analyze and disclose the impacts of the Rebuild Project. Accordingly, the Initial Study/MND fails to comply with the requirements of CEQA on this basis.

c. The Initial Study/MND Fails to Identify the Required Discretionary Approvals

The Rebuild Project is located within the Coastal Zone and the District must apply for and obtain a Coastal Development Permit (“CDP”) from the City of San Diego.¹ The San Diego Municipal Code states,

A Coastal Development Permit issued by the City is required for all *coastal development of a premises* within the Coastal Overlay Zone described in Chapter 13, Article 2, Division 4, unless exempted by Section 126.0704, or if the proposed project site lies completely within the Coastal Commission Permit Jurisdiction or the Deferred Certification Area as described in Section 126.0702(b).

(SDMC, § 126.0702(a); see also § 132.0402 [Coastal Overlay Zone].)

Moreover, the development of the original school in 1965 appears to have been authorized pursuant to a City-issued discretionary permit, in which case, an amendment would be required to account for the Rebuild Project. The IS/MND also fails to acknowledge that the current zoning of the site requires a conditional use permit for school facilities and fails to acknowledge that it is not a previously conforming use pursuant to the City of San Diego’s regulations, because it results in an intensification of use. (SDMC § 126.0107(b)). Finally, the Initial Study also fails to list the City of San Diego as a public agency whose approval is required.

III. THERE IS A FAIR ARGUMENT THAT THE PROJECT WILL HAVE POTENTIALLY SIGNIFICANT EFFECTS ON THE ENVIRONMENT

As will be discussed herein, the Initial Study/MND has failed to comply with many of the baseline requirements of CEQA and is therefore insufficient to support approval of the project. The Rebuild Project proposes the demolition of 52,406 square feet of buildings and new construction of 66,823 square feet of classrooms and collaboration spaces. As part of the project, the existing grass area on campus will be reduced by 41,643 square feet and will be replaced with new buildings. The scope of the project and the analysis set forth in the Initial Study/MND shows that the Rebuild Project may have a significant, unmitigated impact on the environment, and the District must therefore prepare an environmental impact report.

a. Experts

This comment letter includes comments from technical experts at RK Engineering Group, Inc. RK Engineering Group’s comments and qualifications are attached hereto as Exhibits B and C, respectively, and are incorporated herein by reference.

Robert Kahn, P.E., T.E., has worked professionally in traffic engineering and transportation planning since 1968. Mr. Kahn received his masters of science degree in civil engineering from the University of California, Berkeley, Institute of Transportation and Traffic Engineering and received his

¹ As of the date of this letter, the District has not produced any evidence that it rendered the City of San Diego’s zoning ordinances inapplicable to the Rebuild Project in accordance with California Government Code section 53094(b).

bachelor's degree in Civil Engineering from the University of California, Berkeley. Mr. Kahn has worked for a major land development company preparing Master Plans for infrastructure and has worked at a multi-disciplined consulting and engineering firm in charge of Engineering Planning Development, which included all facets of preliminary design, tentative map preparation, transportation and environmental engineering, and public agency coordination.

Additionally, Mr. Kahn has been involved in acoustical engineering since 1978. Mr. Kahn has been responsible for major acoustical engineering projects including the Aliso Viejo Noise Monitoring Program, which redefined the 65 CNEL noise contours for MCAS El Toro. Mr. Kahn has prepared numerous noise impact reports in the Southern California area.

Bryan Estrada, ACIP, PTP, has worked in traffic/transportation planning, air quality and greenhouse gas analysis, and environmental acoustics/noise analysis since joining RK Engineering in 2007. Mr. Estrada graduated from the University of California, Irvine, where he received a Bachelor of Arts degree in Urban Studies. Mr. Estrada has obtained the American Institute of Certified Planners certification granted by the American Planning Association and the Professional Transportation Planner certification granted by the Transportation Professional Certification Board. Mr. Estrada has been involved with transportation and environmental planning projects ranging from site-specific technical studies to regional and General Plan level analyses. Mr. Estrada has recently worked on projects including mixed use development projects in Downtown Huntington Beach, the City of Aliso Viejo General Plan Update and Aliso Viejo Town Center Vision Plan, the Eleanor Roosevelt High School eStem Academy Traffic Study and On-Site Circulation Plan and more.

Darshan Shivaiah, M.S. has experience in conducting acoustical impact analysis, air quality and greenhouse gas reports, traffic impact reports, parking studies and queuing studies. Mr. Shivaiah graduated from the University of California, Irvine, where he received a Master of Science degree in Environmental Engineering, with a specialization in Air Quality and Water & Wastewater Engineering. Mr. Shivaiah is experienced in analyzing acoustical and air quality studies and has crafted mitigation measures to meet the standards of particular agencies and jurisdictions.

When conducting environmental review, “[i]f there is disagreement among expert opinion supported by facts over the significance of an effect on the environment, the Lead Agency shall treat the effect as significant and shall prepare an EIR.” (Guidelines, § 15064(g).) **RK Engineering’s report identifies “several technical issues with respect to the analysis that show that the Rebuild Project has potentially significant impacts on the environment and requires further assessment to determine whether significant impacts would occur and whether additional mitigation measures are required.”** Accordingly, the District must prepare an EIR to address these potentially significant impacts.

b. Aesthetics

The Initial Study concludes that the Rebuild Project will not have any significant impacts to aesthetics, but fails to adequately consider the project’s impacts on the surrounding community and adjacent Torrey Pines State Reserve Extension. The Rebuild Project erroneously concludes that the project has a less than significant impact to new sources of substantial light or glare which would adversely affect day or nighttime views in the area. The Initial Study concludes that the lighting

towards the Torrey Pines State Reserve Extension would be minimal, and impacts to Mira Montana Drive from the lighting in the new parking lot would not be substantially greater than existing levels.

This conclusion, however, is cursory and not supported by proper analysis or fact. The Initial Study fails to adequately consider the baseline conditions surrounding the school site. Currently, Mira Montana Drive is adjacent to a grass field and is not impacted by the school's lighting. Additionally, the existing playfields and hardcourts are adjacent to the Torrey Pines State Reserve Extension, resulting in minimal impacts from the school's lighting. The Rebuild Project, however, will undoubtedly increase the light impacts to these areas as a result of the newly-expanded parking lot along Mira Montana Drive and the expansion of the classrooms across the entirety of the project site—bringing light much closer to the Torrey Pines State Reserve Extension. The impacts resulting from the lighting in these new locations is potentially significant and must be analyzed against the current (minimal) baseline conditions. Accordingly, the District must prepare an EIR and conduct a lighting study to analyze the impacts of the new lighting based on the existing conditions surrounding the school site.

c. Air Quality/Greenhouse Gas Emissions

The Air Quality analysis in the Initial Study/MND is based in part on the Air Quality and Greenhouse Gas Emissions Analysis in Appendix B to the Initial Study. As part of the analysis in the Initial Study, the District considered whether the Rebuild Project would expose sensitive receptors to substantial pollutant concentrations. In doing so, Appendix B and the Initial Study should have taken into consideration the sensitive receptors (residential areas) surrounding the Rebuild Project, including the homes located on Boquita Drive and Mira Montana Drive. Appendix B, states that “[t]he nearest sensitive receptors to the proposed project site are the residences along Whitmore Street, Prospect Avenue, Garvey Avenue, and New Avenue to the north, east, south, and west, respectively.” These streets are not located near the Rebuild Project, but are located in Rosemead, CA. This error suggests that the air quality impacts to the sensitive receptors surrounding the Rebuild Project were not properly analyzed.

The Rebuild Project significantly alters the layout of the School and greatly extends the existing parking lot down the entirety of Mira Montana Drive. Extending the parking lot in this fashion will significantly increase the vehicle emissions exposure to the Mira Montana Drive properties. These homes face the existing fields and are thus not exposed to the types of vehicle emissions associated with a parking lot. The new design of the school will cause a significant increase in emissions and exposure to uphill properties as the westward wind will trap emissions between the long stretch of buildings/black top and the bluff, which will then move towards the homes on Mira Montana Drive. Additionally, the Rebuild Project will increase vehicle emission exposure to the homes directly adjacent to the existing parking lot. The Initial Study states that parents currently park off campus (on Cordero Road or Mira Montana Drive) to pick-up/drop off their students. The District states that the purpose of the increased parking lot is to ensure that more cars can drive through the parking lot, which will undoubtedly result in increased vehicle emissions to the homes near the existing parking lot as well.

The Initial Study claims that 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 District relies on the Bay Area Quality Management District's CEQA Guidelines to determine whether any increase is significant and does not take into account any specific details of the Rebuild Project. Specifically, the Rebuild Project will not produce increased traffic at an intersection, but instead will include a substantially larger parking lot which will result in a re-routing of traffic. As such, relying on the Bay Area standard is clearly inappropriate. By using standards designed for the Bay Area, the Initial Study erroneously concludes that there will be no significant impacts to the surrounding sensitive receptors as a result of the increased parking lot.

Additionally, the Initial Study states that during construction "contractors are anticipated to minimize non-essential idling;" however the Initial Study/MND does not provide for any monitoring plan to ensure compliance with this important mandate. Assessing and reducing air quality impacts is especially important when a project involves young children, like the District's K-6 students. The Initial Study also fails to address the requirements set forth in the San Diego Climate Action Plan ("CAP") and failed to consider how the Rebuild Project would meet GHG reduction requirements for the life of the entire project.

Based on the adjacent sensitive receptors located within 25 feet of the project site to the north, the Initial Study/MND "should further analyze the potential significant impacts to the adjacent homes from adverse construction emissions and fugitive dust." (Ex. B, p. 2.) Accordingly, an environmental impact report must be performed to adequately analyze the impact of increased vehicle emissions as a result of the Rebuild Project.

The Initial Study/MND for the Rebuild Project also fails to comply with the requirements of Public Resources Code section 21151.8. An EIR or negative declaration for a project must include information to determine whether the school site is a current or former hazardous waste disposal site or solid waste disposal site; is a hazardous substance release site identified by the Department of Toxic Substances Control; contains one or more pipelines that carries hazardous substances or wastes; or is a site within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor. (Pub. Resources Code, § 21151.8.) Additionally, a school district must notify in writing and consult with the administering agency in which the proposed school site is located, and with any air pollution control district or air quality management district with jurisdiction, to identify both permitted and non-permitted facilities within that district's authority. (*Ibid.*) The District must comply with these requirements prior to approving the Rebuild Project.

d. Biological Resources

The Rebuild Project requires the destruction and grading of a significant portion of the existing school fields and all of the existing school building, which is likely to affect numerous sensitive species that call the surrounding coastal habitat and Torrey Pines State Reserve Extension home. Further, when a project is located in a coastal zone, the Initial Study/MND should analyze whether any significant habitat on the site may qualify as environmentally sensitive habitat areas under the Coastal Act. (See *Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 941.) The Initial Study discusses sensitive plant species and sensitive wildlife, but does not address whether the project site contains any environmentally sensitive habitat under the Coastal Act. The Initial Study fails to meet this requirement of the Coastal Act.

The Initial Study/MND omits the proper Coastal Act analysis and fails to discuss all of the Rebuild Project's possible effects on the environment. The evidence shows that it is possible that the Rebuild Project will have a significant effect on the environment and thus, an environmental impact report must be prepared.

e. Hazards and Hazardous Materials

The Initial Study's analysis of the Rebuild Project's environmental effects related to hazards and hazardous materials is based in part on the Phase 1 Environmental Site Assessment for the Del Mar Heights Elementary School Rebuild Project, conducted by PlaceWorks in October 2019 (the "ESA"). The ESA omits discussion of four topics necessary for evaluating a demolition and complete rebuild project of this scale.

First, the ESA failed to fully consider the presence of polychlorinated biphenyls ("PCB") occurring on site. The ESA conducted an assessment of PCBs that was limited to "electrical or hydraulic equipment known or likely to contain PCBs' to the extent visually and or physically observed or identified," and concluded that no electrical or hydraulic equipment was observed on site. However, the ESA should have performed a more thorough analysis given the prior presence of PCBs on site. In 2000, the School had PCBs transported off-site for proper disposal. The ESA does not discuss the amount and source of the PCBs, and how they were used/handled on site. Further analysis is necessary to ensure that the PCBs were properly removed from the site, and to ensure that remaining PCBs, if any, are within acceptable limits.

Second, in 2000 the School had 20.22 tons of asbestos containing waste that was transported off-site for disposal under a manifest. The ESA does not describe the source of the waste. Due to the age of the School's original development, asbestos-containing materials are likely present and a proper management plan should be in place for the planned demolition activities since they pose an air emission risk to students, teachers, and the surrounding community.

Third, in 2000 the School also disposed of 0.17 tons of organic liquid off-site. The ESA does not discuss what generated this material and how it was managed while on-site. Additional analysis and discussion is required to ensure that this organic liquid was properly disposed of and does not remain on site as a risk to students, teachers and the surrounding community.

Finally, Assembly Bill 746 (Health & Safety Code, § 116277) requires that by July 1, 2019, community water systems test lead levels in drinking water at all public K-12 schools constructed before January 1, 2010. The ESA does not discuss whether this test was done, and whether the results were satisfactory. The District must perform this test to ensure compliance with this regulation, and the safety of their students.

f. Hydrology and Water Quality

The Initial Study/MND fails to adequately analyze and address the stormwater management for the Rebuild Project. As the Initial Study/MND recognizes, the existing stormwater outfall pipes show significant signs of deterioration and are causing erosion along the southern and western limits of the School. This has resulted in failed drainages, and deep erosional gullies and loss of vegetation within the eroded areas. The impacts of these failing outfall pipes extend into the adjacent Torrey

Pines State Reserve Extension; however, the existing and continuing damage resulting from the on-site stormwater has not been addressed as part of the Rebuild Project.

To make matters worse, the Initial Study/MND fails to provide sufficient information regarding the Rebuild Project's stormwater management plans. The Rebuild Project will greatly increase the amount of impervious cover on the site and includes major modifications to the site's current stormwater management. The Initial Study/MND, however, fails to provide any details as to the proposed plan and summarily concludes that BMPs such as swales and landscape planters would reduce runoff. For example, the Initial Study/MND does not discuss the impacts of the slope just outside the fence where the discharge is proposed, which will greatly impact the effectiveness of the proposed stormwater management. In approving the Rebuild Project, the District must analyze the impacts to the environment, including any adverse impacts related to improper or insufficient stormwater management. A complete analysis of the stormwater management plans for the Rebuild Project is therefore a necessary element of the Initial Study/MND.

g. Land Use & Planning

The Initial Study concludes there will be no impacts to land use and planning but it fails to discuss conformity with the City's General Plan and the Torrey Pines Community Plan. In determining whether the Rebuild Project will 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, the Initial Study only analyzed the zoning of the project site and stated that the Rebuild Project would not change the zoning or land use designation of the site (which is currently RS-1-3 Instructional and Public and Semi-Public facilities). The Initial Study did not consider whether the Rebuild Project conflicts with the City's General Plan, specific plan, and local coastal program.

The Initial Study/MND's discussion of land use and planning focuses only on zoning and does not mention the City of San Diego's General Plan or the Torrey Pines Community Plan. Discussion of the Rebuild Project's consistencies with these policies is critical. For example, since the Rebuild Project will result in a significant reduction in useable open space, the Initial Study should address the Rebuild Project's consistency with one of the key goals of the Torrey Pines Community Plan: to provide useable public parks and active playing fields for use by all age groups.

The Initial Study does not address the conformity with the Torrey Pines Community Plan related to the preservation of the Torrey Pines State Reserve Extension, directly adjacent to the Rebuild Project (which is designated as a biologically sensitive habitat). The Torrey Pines Community Plan sets forth requirements for private and public developments to ensure that there are no encroachments or negative impacts to the Reserve Extension. For example, adequate buffer areas and appropriate landscaped screening shall be provided and maintained to avoid visual and erosion impacts from construction and landscaping must not use invasive plant species and must use plant species naturally occurring in the area. The Plan also recommends the preservation of Torrey Pine trees and states that relocation or replacement of Torrey Pine trees shall occur whenever feasible.

Additionally, the Torrey Pines Community Plan lists the key policies for which the Initial Study should discuss the Rebuild Project's conformity with. The Initial Study fails to address the key policies that "[a]ll development adjacent to open space areas shall be designed to reduce visual and

development impacts,” and that “[t]he construction of public projects shall avoid impacts to residential neighborhoods.” The Initial Study omits all discussion of the Torrey Pines Community Plan’s recognition that the “Torrey Pines community planning area possesses many highly scenic open space areas and dramatic vistas [and] also has a number of road segments that have scenic qualities worthy of formal recognition and protection.” The Torrey Pines Community Plan recognizes that the Torrey Pines State Reserve Extension is a significant scenic resource and the Initial Study fails to address the conformity with this, or any of the other important policies expressed in the Plan.

h. Noise

The Initial Study/MND concludes that (a) there is a less-than-significant impact to noise from the temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of the standards established in the local general plan or noise ordinance; (b) that the generation of excessive ground borne vibration or ground borne noise levels are less than significant with mitigation incorporated; and, (c) that there is no impact to noise for a project located within the vicinity of a private airstrip or airport land use plan, or within two miles of a public airport or public use airport.

The Initial Study Excludes Critical Thresholds of Significance for Noise Impacts

Preliminarily, the Initial Study fails to use an adequate threshold of significance to determine noise related impacts. The Initial Study states that it is using the recommended criteria set forth in the City of San Diego’s CEQA Significance Determination Thresholds (the “City Thresholds”); however, it only includes the threshold of whether the Rebuild Project would expose people to noise levels in excess of the City’s adopted noise ordinance. The thresholds of significance set forth in the Initial Study fail to take into account whether the Rebuild Project would result or create a significant increase in *the existing ambient noise levels surrounding the project*, as set forth in the City’s guidelines.

Notably, the Initial Study/MND did not conduct any noise monitoring at or around the project site. In order to provide accurate information of the existing baseline conditions and future noise level impacts to the adjacent residential homes, the noise study must be revised to include ambient daytime noise monitoring at the property line of the adjacent homes. Failing to consider whether the project will result in an increase to the existing ambient noise levels is also inconsistent with the suggested thresholds of significance set forth in CEQA Appendix G (§ XII, (c) and (d)). By excluding impacts to existing ambient noise levels, the District has improperly excluded the analysis of potentially significant impacts of the Rebuild Project. As will be discussed below, the Initial Study has potentially significant effects to the existing ambient noise levels of the single-family residential properties surrounding the school site.

The Initial Study Improperly Concludes Less than Significant Impacts to Noise Levels

The Initial Study recognizes that the single-family homes to the north and east of the project site are sensitive receptors “where quiet environments are necessary for the enjoyment, public health, and safety of the community.” The San Diego Municipal Code (Chapter 5, Article 9.5) sets the following exterior sound level limits for single-family residential areas: 50db (7 a.m. to 7 p.m.), 45db

(7 p.m. to 10 p.m.), and 40db (10 p.m. to 7 a.m.). The City Thresholds state that temporary construction noise exceeding 75dB at a sensitive receptor would be considered a significant impact.

Construction Related Noise Impacts

The Initial Study/MND found that average noise levels resulting from construction activities were less than significant. The District concluded that construction related noise levels would not exceed the 75dBA limit set forth in the City's Thresholds at the nearest residential property, and therefore the construction related noise would be a less-than-significant impact to the surrounding residential receptors.

This finding, however, was based on noise impacts to single-family homes located 330 feet east of the project site. The Initial Study fails to recognize that residential homes are located less than 25 feet from the project site to the north, within 85 feet of the residential homes to the east, and less than 100 feet from the Torrey Pines Extension State Park and Trail. Project related construction noise was calculated from the center of the project site, and fails to account for any construction activities that would occur throughout the construction site—such as the construction of the expanded parking lot and new classrooms, all of which are located within 330 feet of the surrounding single-family residences. The Initial Study/MND improperly concludes that the construction-related noise impacts will produce a less than significant impact to the surrounding sensitive residential receptors, since there are potentially significant noise impacts to the surrounding residential homes and Torrey Pines State Reserve Extension. Accordingly, RK Engineering concluded that “[t]here is a potentially significant impact to the noise levels experienced at these residential homes and RK recommends that the project provide additional analysis of worst case construction noise levels at noise sensitive locations.” (Ex. B, p. 3.)

Operational Noise Impacts

First, the Initial Study fails to analyze the potential noise impacts on the adjacent Torrey Pines State Reserve, despite the fact that “construction activities are expected to occur at less than 100 feet from the Torrey Pines Extension State Park & Trail and may have a potentially significant effect in this area.” Construction and operational noise will both likely impact this area, and the District must analyze noise to determine whether there is a significant impact to this area.

Further, despite the expanded parking lot and added drop-off/pick-up lane parallel to Mira Montana Drive, the Initial Study/MND summarily concludes that traffic noise would not significantly increase above existing conditions and noise impacts would be less than significant.

The single-family residences on Mira Montana Drive currently face a garden and grass field; however, the Rebuild Project proposes to replace the grassy field with a parking lot and buildings. This new construction will move the noise related impacts of idling cars, slamming car doors, car horns/beeps, and school loud speakers away from the current parking lot area directly in front of the homes on Mira Montana Drive.

The noise related impacts of the new parking lot and campus located directly in front of these properties and other single-family residences in the area may have potentially significant noise-related impacts. Not only is it possible that the operational noise from the new campus and

parking lot exceed the standards set forth in the SDMC, the new campus and parking lot will likely result in a significant impact to the existing ambient noise levels of the homes located on Mira Montana Drive.

The Initial Study/MND fails to include existing ambient noise level measurements from the nearest sensitive noise receptors in order to determine the existing baseline conditions. Expansion of the parking lot and the addition of a drop-off/pick-up lane along the east and southeast portions of the site may result in “a potentially significant effect resulting from the additional vehicle movement and parking lot activity that may occur on-site . . .” (Ex. B, p. 4.) The District must establish baseline conditions and include a threshold of significance to determine whether the Rebuild Project will have a significant effect on the existing ambient noise levels for the community. Accordingly the District must prepare an environmental impact report to analyze and address any potentially significant increases in noise.

i. **Public Services & Recreation**

Fire Protection

The Initial Study/MND concludes that there would be no impact to fire protection since the student capacity would remain unchanged and the expanded parking lot would remove congestion adjacent to the school and the addition of fire lanes would improve emergency vehicle access. The Initial Study fails to analyze whether the expanded parking lot and addition of cars on campus would impede emergency access, since the parking lot drive aisles may limit or block emergency vehicles from quickly reaching the far ends of campus during peak drop-off and pick-up times. The District should perform an emergency access and fire access study, as well as a traffic study to ensure that the new parking lot does not create an impediment for first responders and slow response times.

Schools

The California Department of Education Guide to School Site Analysis and Development (2000 Edition) (the “Site Development Guide”)² was drafted for the purpose of “assist[ing] school districts in determining the amount of land needed to support their educational programs in accord with their stated goals and in accord with recommendations of the California Department of Education.” Based on the most recent enrollment figures in the Del Mar Heights Elementary School Accountability Report Card, the Site Development Guide states that a school like Del Mar Heights should have outdoor field areas (exclusive of kindergarten) totaling 166,320 square feet.³

The District’s plans call for a reduction of the field area by 41,643 square feet, which by the District’s calculations will result in a field area of only 92,213 square feet (see **Exhibit E**, January 22,

² Available at <https://www.cde.ca.gov/ls/fa/sf/documents/schoolsiteanalysis2000.pdf>

³ In 2018–19, the Del Mar Heights School had an enrollment of 211 students in Grades 1 through 3, and 221 students in Grades 4 through 6. (**Exhibit D.**) The Site Development Guide states that the school should have two (2) fields measuring 90 feet by 120 feet, with a 10% factor for layout for Grades 1 through 3 (23,760 square feet), and four (4) fields measuring 180 feet by 180 feet, with a 10% factor for layout for Grades 4 through 6 (142,560 square feet).

2020 Board Presentation)—far short of the requirements set forth by the California Department of Education.⁴

The District states that there are no impacts to schools because the project would address the most critical physical needs of buildings and grounds at the campus; however, the current design of the Rebuild Project will deprive students of the necessary field area as determined by the California Department of Education. Accordingly, the Rebuild Project presents a potentially significant impact to public services and an environmental impact report should be drafted to address this potential impact.

Parks & Recreation

The Initial Study concludes that the Rebuild Project had a less than significant impact to parks and a less than significant impact to recreation. The Initial Study concludes that the Rebuild Project would not generate a demand for park space, would not result in negative impacts to existing neighborhood and regional parks or other recreational facilities, and would not require construction of offsite recreational facilities. In support of these conclusions the Initial Study states that the project would improve the recreational facilities available for community use by providing amenities that are not currently available to the community.

The Initial Study fails to consider the impact of greatly reducing open space within a community that is already significantly lacking park space. The City's General Plan, Recreational Element, establishes a population-based park requirement of 2.40 usable acres per 1,000 population. As set forth in the Torrey Pines Community Plan, the potential buildout population of the community area is 7,000 and would require 16.80 usable acres of park space. The only park within the Torrey Pines community plan area is the Crest Canyon Neighborhood Park, which has approximately 1.5 acres of usable park area. Thus, the Torrey Pines community planning area is 15.30 acres short of its requirements.

The Torrey Pines Community Plan recognizes the need for additional park space and has expressly indicated a possible joint use of the Del Mar Heights Elementary School to help fulfill its shortfall. Now, instead of helping the existing shortage of parks, the Rebuild Project proposes to diminish the usable park area by at least 41,643 square feet (.96 acres). There is a likely possibility that the reduction of usable recreation area from the school site will generate a demand for park space and would cause increased use of other existing (and limited) park facilities within the Torrey Pines community plan area. The Initial Study therefore improperly concluded that there is a less than significant impact to parks and recreation, and an environmental impact report should be prepared to analyze the impacts to parks and recreation as a result of the Rebuild Project's reduction in usable open space.

⁴ Save the Field disputes the accuracy of the District's calculations and estimates that the true size of the new field is less than 80,000 square feet.

j. Transportation

The transportation analysis included in the Initial Study/MND is deficient and the Rebuild Project may result in significant impacts around the Del Mar Heights School, Del Mar Hills Academy and communities located to the east along Carmel Valley Road which will provide access to the existing Ocean Air Elementary School. The traffic impacts caused by the redistribution of the Rebuild Project may result in significant environmental effects and further assessment and potentially additional mitigation measures are required to analyze and reduce the potential impacts to the residential communities in these areas.

The traffic analysis only reviewed traffic impacts at three intersections in the vicinity of the Del Mar Hills Academy and Ocean Air Elementary School. The analysis presents several issues with respect to the assumed redistribution of traffic to those other schools and the need to access additional intersections, especially with respect to the Ocean Air Elementary School. Additional study area intersects are needed to fully assess the potentially significant redistribution impacts of traffic and buses to the other elementary schools. Additionally, “the potentially significant impacts of the bus traffic need to be assessed both to/from the Del Mar Hills Academy and Ocean Air School. This was not included in the Traffic Impact Analysis.” (Ex. B, p. 7.)

The Initial Study/MND did not document whether the traffic counts were obtained in February 2020, or even if the traffic counts were done when school was in full session. Since no traffic count worksheet was provided, the date and accuracy of the counts cannot be determined. This must be clarified so that a full review of the potentially significant impacts can be determined from accurate baseline conditions.

Further, traffic generation of additional bus traffic must be considered in the traffic analysis. Bus trips must be converted to Passenger Car Equivalents (“PCEs”) to adequately address the impacts of the redistribution of project traffic and the use of buses taking students to Del Mar Hills Academy and the Ocean Air Elementary School. Additionally, the District is proposing to load and unload 4th to 6th grade students at a location adjacent to the Del Mar Hills Academy. As a result of the additional traffic, on street parking and residential driveway access, the District should consider alternative locations not in residential neighborhoods to lessen the potentially significant impact to adjacent neighborhoods from the additional traffic and buses.

As a result of the existing traffic congestion in the vicinity of Del Mar Hills Academy, an alternative staging area for students being transferred by bus should be considered. The currently proposed bus staging at the Del Mar Hills Academy would eliminate a substantial amount of on-street parking that is currently utilized by the school and adjacent residential neighborhood. Buses returning back to Del Mar Heights Road would be required to travel through the existing residential neighborhood causes unnecessary and potentially significant impacts. The bus staging is currently a red curb zone and existing major driveway to the Bella Del Mar Apartments. Bus parking in this area would cause congestion and potentially dangerous sight distance problems at this driveway. “There may be a potentially significant impact as a result of these factors and for the safety to the students, an alternative staging area, outside of the existing impacted area around the Del Mar Hills Academy School, needs to be located for the bus traffic which won’t impact the existing residential neighborhood.” (Ex. B, p. 8.)

The distribution of traffic to the Ocean Air Elementary School of 35% is unrealistic. The vast majority of traffic that will be redistributed from the Del Mar Heights School including cars and buses would come from the west of Center Heights Drive along Carmel Mountain Road. The 35% distribution to and from the east of Center Heights Drive does not appear to be realistic.

Finally, a Construction Traffic Impact Analysis was not provided as part of the Initial Study/MND. “Potentially significant traffic impacts during construction need to be assessed with respect to workers, deliveries, construction vehicles and other activities that will occur during the various phases of construction.” (Ex. B, p. 8.)

k. Wildfire and Emergency/Fire Access

The Del Mar Heights School is located in or near a Very High Fire Severity Zone (Gov. Code, § 51178). The Rebuild Project will completely redesign the campus and will result in the majority of classrooms being located south of their current location, much further away from the single entrance on Boquita Drive. Additionally, new improvements are being constructed southwest of their current location, near the Torrey Pines State Reserve Extension. The sole access point to the entire campus is the entrance at the end of Boquita Drive, which requires first responders to travel much greater distances through a crowded parking lot before reaching the majority of classrooms.

The Initial Study/MND fails to adequately address the levels of significance for wildfires. The District erroneously concludes that the Rebuild Project will have less than significant impacts to (a) impairment of an adopted emergency response plan or emergency evacuation plan, (b) exacerbation of wildfire risks due to slope, prevailing winds and other factors thereby exposing project occupants to pollutant concentrations from wildfire or uncontrolled spread of wildfire, (c) will require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment, and (d) expose people or structures to significant risks as the result of runoff, post-fire slope instability or drainage changes.

It is concerning that the Initial Study/MND does not include a specific wildfire evacuation study as part of the environmental review given the new design of the campus. Evacuation of the campus will likely take much longer than before, since students will now be housed in classrooms on the very southern portion of the campus, compared to the current location of the classrooms on the northern end of campus near Boquita Drive. The Initial Study summarily concludes that 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,” and that there are less than significant impacts to emergency response or emergency evacuation plans. The District, however, has no evidence that the proposed design of the Rebuild Project will not conflict with current emergency response plans and will not significantly increase the emergency response times of first responders. The District must perform a traffic study and an evacuation study to ensure that first responders would have adequate access to the site during peak drop-off and pick-up times and that students and staff can safely evacuate in the event of a wildfire.

It is concerning that an evacuation plan/time study has not been performed given the substantial increase in the number of students enrolled at the School. Del Mar Heights School was originally constructed for 350 students—who were to be bussed to school—but now has an

enrollment of approximately 500 students, none of whom are bussed. The substantial increase in the student population, combined with the new design of the school, has the high probability of increasing evacuation times. Given the new design of the campus and the fact that the buildings (and students) are housed significantly further from the campus's only entrance, an evacuation study should be performed to ensure that the current design of the campus does not substantially impair emergency response/evacuation and does not expose students and teachers to unnecessary risk.

Additionally, the Initial Study erroneously concludes that the Rebuild Project would not require the installation or maintenance of associated infrastructure that may exacerbate fire risk or that may result in temporary or ongoing risks to the environment. The Initial Study only discusses the installation of utilities to meet service requirements and states that infrastructure improvements would not directly increase fire risk. The Initial Study fails to state the fact that the Site Plan (Figure 5) does not show a fire access lane around the entire campus, which would significantly exacerbate fire risk to the children and the community.

Given the location of the Rebuild Project upslope from the adjacent Torrey Pines State Reserve Extension, and the prevailing winds from the west, the Rebuild Project may exacerbate wildfire risks and expose project occupants and the nearby community to uncontrolled spread of wildfire. The Initial Study merely concludes that the project has fire resistant components and will comply with applicable codes, and that any impacts are less than significant. The Initial Study fails to analyze and discuss the impacts of the Rebuild Project and the possible significant effects resulting from the prevailing winds and open space adjacent to the Rebuild Project. Accordingly, the Initial Study/MND fails to adequately address the levels of significance for wildfires.

IV. ANALYSIS OF PROJECT ALTERNATIVES/MITIGATION IS INADEQUATE

“A public agency shall provide that measures to mitigate or avoid significant effects on the environment are fully enforceable through permit conditions, agreements, or other measures.” (Pub. Resources Code, § 21081.6.) A project applicant's agreement to certain mitigation measures by itself is insufficient—the mitigation measure must be adopted in a way that makes it legally enforceable. (*Woodland Park Homeowners Association v. City of Fresno* (2007) 150 Cal.App.4th 683, 730.) Mitigation measures that require a report to be prepared and the recommendations therein to be followed, or allow for approval by an agency without setting standards, are not appropriate mitigation measures under CEQA. (*Endangered Habitats League, Inc. v. County of Orange* (2005) 131 Cal.App.4th 777, 793-794.)

The mitigation measures set forth in the Initial Study/MND (GEO-1, CUL-1, and N-1) are insufficient mitigation measures under CEQA. For example, GEO-1 and N-1 are not legally enforceable. GEO-1 only requires a paleontological report to be conducted prior to construction and N-1 only states that if paving activities are required within 25 feet of nearby residential structures, use of a static roller in lieu of a vibratory roller shall be employed. These mitigation measure are not enforceable through any of the District's permit conditions, agreements, or any other measures, and therefore do not comply with CEQA. Further, GEO-1 states that a paleontological report will be conducted prior to construction and recommendations will be made to the District, and CUL-1 provides that a qualified archaeological monitor will be “on call” during ground-disturbing activities

and will make recommendations to the District if necessary. These deferred mitigation measures do not comply with CEQA as they do nothing more than require a report with recommendations and are not legally enforceable in any way.

V. THE DISTRICT FURTHER VIOLATED CEQA BY SUBMITTING DETAILED CONSTRUCTION PLANS TO THE DIVISION OF THE STATE ARCHITECT PRIOR TO PROJECT APPROVAL

The CEQA Guidelines recognize that “[c]hoosing the precise time for CEQA compliance involves a balancing of competing factors.” (Guidelines, § 15004(b).) Environmental review must be conducted “as early as feasible . . . to enable environmental considerations to influence project program and design and yet late enough to provide meaningful information for environmental assessment.” (*Ibid.*) Public projects “shall incorporate environmental considerations into project conceptualization, design and planning.” (Guidelines, § 15004(b)(1).) To implement these principles, “public agencies *shall not* undertake actions concerning the proposed project that would have a significant adverse effect *or limit the choice of alternatives or mitigation measures, before completion of CEQA compliance.*” (*Ibid.* [Emphasis added].) The Guidelines expressly state that a public agency “shall not . . . take any action which gives impetus to a planned for foreseeable project in a manner that forecloses alternatives or mitigation measures that would ordinarily be part of CEQA review of that public project.” (*Ibid.*)

On February 11, 2020—prior to the release of the Initial Study/MND for public comment—the District submitted detailed construction plans as part of its plan review submission to the California Division of the State Architect (“DSA”). The District’s February 11, 2020 submission to the DSA included 27 pages of Increment 1 demolition plans, grading plans, utility plans, erosion control plans, underground site fire piping, utility site plan, and the overall site plan. Approximately two weeks later, on February 28, 2020, the District submitted an additional 292 pages of Increment 2 construction plans. The Increment 2 plans include detailed construction plans including, *inter alia*, grading plans, erosion control plans, irrigation plans, landscape planning plans and details, architectural plans (including site, fence, window, roof, ceiling, and interior details), structural plans, mechanical plans, plumbing plans, fire protection plans and electrical plans.

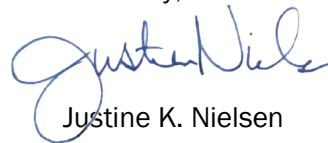
The District has further violated CEQA by preparing and submitting 319 pages of construction plans prior to completing its CEQA review. The District has expended a considerable cost and time by preparing construction plans for a project that has not yet been approved and is more likely to ignore environmental concerns and not consider project alternatives or mitigation measures. The fact that the District is preparing and approving the CEQA findings for its own project further exacerbates these concerns. (See *Laurel Heights Improvement Association v. Regents of University of California* (1988) 47 Cal.3d 376, 395 [stating, “the later the environmental review begins, the more bureaucratic and financial momentum there is behind a proposed project, thus providing a strong incentive to ignore environmental concerns that could be dealt with more easily at an early stage of the project. This problem may be exacerbated where, as here, the public agency prepares and approves the EIR for its own project”].)

VI. CONCLUSION

Save the Field expressly reserves the right to supplement its comments at or prior to any hearings on the Rebuild Project. (Pub. Resources Code, § 21177(a); *Bakersfield Citizens for Local Control v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1199-1203.) Save the Field further incorporates by reference any and all comments raising issues with the Initial Study/MND and the Rebuild Project. (*Citizens for Clean Energy v. City of Woodland* (2014) 225 Cal.App.4th 173, 191 [stating, “[a]lthough an issue must first have been raised during the administrative process to be preserved for judicial review, it may be argued in court by a different person”].)

The Initial Study/MND fails to comply with CEQA and the evidence shows that the Rebuild Project may have a significant effect on the environment. In addition to the significant effects raised in this letter, RK Engineering “has identified a number of potentially significant impacts and technical issues that need to be addressed prior to considering the environmental review as being complete.” (Ex. B, p. 9.) Accordingly, the District must prepare an environmental impact report.

Sincerely,



Justine K. Nielsen

JKN:jfo
Attachments

EXHIBIT A

Del Mar Union School District Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, PO Box 3044, Sacramento, CA 95812-3044
(916) 445-0613 state.clearinghouse@opr.ca.gov

SCH # **2020029070**

PROJECT TITLE

Del Mar Heights School Rebuild Project

LEAD AGENCY

Del Mar Union School District

CONTACT PERSON

Chris Delehanty, Executive Director, Capital Programs and Technology

STREET ADDRESS

11232 El Camino Real

PHONE

858.523.6040

CITY

San Diego

ZIP CODE

92130

COUNTY

San Diego

PROJECT LOCATION

COUNTY

San Diego

CITY/NEAREST COMMUNITY

City of San Diego

CROSS STREETS

Boquita Drive and Cordero Road

ZIP CODE

92014

TOTAL ACRES

10.85 ACRE

ASSESSOR'S PARCEL NUMBER

301-0500-700

SECTION

N/A

TOWNSHIP

N/A

RANGE

N/A

WITHIN 2 MILES:

STATE HIGHWAY NUMBER

Interstate 5, State Route 56

AIRPORTS

N/A

SCHOOLS

Torrey Pines High School
Carmel Creek Elementary School

RAILWAYS

Amtrak

WATERWAYS

Pacific Ocean

DOCUMENT TYPE

CEQA

- NOP
- Early Cons
- MND/IS
- Draft EIR

- Supplement/Subsequent EIR (Prior SCH No.) _____
- Other

NEPA

- NOI
- EA
- Draft EIS
- FONSI

OTHER

- Joint Document
- Final Document
- Other _____

governor's Office of Planning & Research

LOCAL ACTION TYPE

- General Plan Update
- General Plan Amendment
- General Plan Element
- Community Plan

- Specific Plan Amendment
- Master Plan
- Planned Unit Development
- Site Plan

- Rezone
- Prezone
- Use Permit
- Land Division (Subdivision, etc.)

- Annexation
- Redevelopment
- Coastal Permit
- Other -Rebuild School

STATE CLEARINGHOUSE

DEVELOPMENT TYPE

- Residential
- Office
- Shopping/Commercial
- Industrial
- Educational
- Other
- Recreational

Units _____
Sq. ft. _____
Sq. ft. _____
Sq. ft. 66,823
Sq. ft. _____
Sq. ft. 282,090

Acres _____
Acres _____
Acres _____
Acres _____

Employees _____
Employees _____
Employees _____

- Transportation
- Mining
- Waste Treatment
- Hazardous Waste
- Water Facilities
- Power

Type _____
Mineral _____
Type _____
Type _____
Type _____ MGD
Type _____ Watts

FUNDING

Federal \$ _____ State \$ _____ Total \$ _____

PROJECT ISSUES DISCUSSED IN DOCUMENT

- Aesthetic/Visual
- Agricultural Land
- Air Quality
- Archaeological/Historical
- Coastal Zone
- Drainage/Absorption
- Economic/Jobs
- Fiscal

- Flood Plain/Flooding
- Forest Land/Fire Hazard
- Geological/Seismic
- Minerals
- Noise
- Population/Housing Balance
- Public Services/Facilities
- Recreation/Parks

- Schools/Universities
- Septic Systems
- Soil Erosion/Compaction/Grading
- Solid Waste
- Toxic/Hazardous
- Traffic/Circulation
- Vegetation
- Water Quality

- Water Supply
- Wetland/Riparian
- Wildlife
- Growth Inducing
- Land Use
- Cumulative Effects
- Other _____

PRESENT LAND USE/ZONING/GENERAL PLAN DESIGNATION: Land Use: Institutional and Public and Semi-Public Facilities; Zoning: RS-1-3.

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), buildings will be limited to one story with low slope roofs, and access to the school will remain via Boquita Drive. The District seeks to submit plans to California Division of the State Architect (DSA) approximately March 2020, with construction to start approximately June 2020 and end approximately July 2021. School opening would be planned for September 2021.

REVIEWING AGENCIES CHECKLIST

- Resources Agency
- Boating & Waterways
- Coastal Conservancy
- Colorado River Board
- Conservation
- Fish and Wildlife
- Forestry & Fire Protection
- Office of Historic Preservation

State & Consumer Services

- General Services

Environmental Protection Agency

- Air Resources Board
- California Department of Resources Recycling and Recovery (CalRecycle)
- SWRCB: Clean Water Grants
- SWRCB: Delta Unit


- Parks and Recreation
- Reclamation Board
- San Francisco Bay Conservation & Development Commission
- Water Resources
- Business, Transportation & Housing**
- Aeronautics
- California Highway Patrol
- CALTRANS District # 1
- Department of Transportation Planning (headquarters)
- Housing & Community Development
- Food & Agriculture Health & Welfare
- Health Services _____

- SWRCB: Water Quality
- SWRCB: Water Rights
- Regional WQCB # 8
- Regional WQCB # 9 (San Diego Region)
- Youth & Adult Corrections**
- Corrections
- Independent Commissions & Offices**
- Energy Commission
- Native American Heritage Commission
- Public Utilities Commission
- Santa Monica Mountains Conservancy
- State Lands Commission
- Tahoe Regional Planning Agency

PUBLIC REVIEW PERIOD

Starting Date: Thursday, February 20, 2020

Ending Date: Monday, March 23, 2020

Signature 
 Chris Delehanty, Executive Director, Capital Programs and Technology
 Del Mar Union School District

Date: Thursday, February 20, 2020

<p>Consultant: Consulting Firm: <u>PlaceWorks</u> Address: <u>3 MacArthur Place, Suite 1100</u> City/State/Zip: <u>Santa Ana, CA 92707</u> Contact: <u>Dwayne Mears</u> Phone: 714.966.9220</p>
<p>Lead Agency: Chris Delehanty, Executive Director, Capital Programs and Technology Del Mar Union School District 11232 El Camino Real San Diego, CA 92130 Phone: 858.523.6040</p>

<p>For SCH Use Only:</p> <p>Date Received at SCH _____</p> <p>Date Review Starts _____</p> <p>Date to Agencies _____</p> <p>Date to SCH _____</p> <p>Clearance Date</p> <p>Notes:</p>

EXHIBIT B

March 27, 2020

SAVE THE FIELD
c/o Justin M. Fontaine, Associate
PROCOPIO, CORY, HARGREAVES & SAVITCH LLP
525 B Street, Suite 2200
San Diego, CA 92101

Subject: Del Mar Heights School Rebuild Project Initial Study/Mitigated Negative Declaration (IS/MND) Air Quality, Noise and Transportation Review

Dear Mr. Fontaine,

Introduction

RK ENGINEERING GROUP, INC. (RK) has reviewed the Air Quality, Noise and Transportation sections of the Del Mar Heights School Rebuild Project Initial Study/Mitigated Negative Declaration, February 2020 (hereinafter referred to as IS/MND) with respect to impacts to the adjoining community. The Del Mar Unified School District proposes to redesign and reconstruct the Del Mar Heights Elementary School, located at 13555 Boquita Drive in the Del Mar Heights subdivision of the Torrey Pines community, in the City and County of San Diego.

The project site currently operates as a K–6 school and includes an administration building, 22 classrooms, and 13 specialty classrooms. The School District plans to fully redesign and reconstruct the school and the capacity will be reduced by one classroom (approximately 24 students). Buildings will be limited to one story with low sloping roofs, and access to the school will remain from Boquita Drive. Construction of the proposed project would occur over an approximate 10-acre site.

RK has reviewed the IS/MND with respect to potentially significant impacts to the surrounding communities. Based upon this review, RK has provided several technical comments regarding the air quality, noise and transportation assessment of the project. While existing school may benefit from certain design changes and upgrades, RK has identified several technical issues with respect to the analysis that show that the Rebuild Project has potentially significant impacts on the environment and requires further assessment to determine whether significant impacts would occur and whether additional mitigation measures are required.

RK's comments on the air quality, noise and transportation sections are made with respect to the information in the IS/MND and page number references are included. These comments need to be addressed prior to approval of the project and the determination if there is a need for additional CEQA assessment of the project.

Comments

Air Quality/GHG (Greenhouse Gas)

1. Page 11 – Sensitive Receptors: The IS/MND states that “The nearest sensitive receptors to the proposed project site are the residences along Whitmore Street, Prospect Avenue, Garvey Avenue, and New Avenue to the north, east, south, and west, respectively.” The sensitive receptors identified in this section are incorrect and do not represent the actual locations of the sensitive receptors around this project. In this case, residential uses along Boquita Drive, Mira Montana Drive, and Mercado Drive would be the closest receptors impacted by this project.

RK recommends that the correct sensitive receptors be identified and updated in the report.

2. Based on the observation made by RK, adjacent sensitive receptors (residential uses) are located within 25 feet of the project site to the north. Due to the proximity of the adjacent sensitive receptors, the IS/MD should further analyze the potential significant impacts to the adjacent homes from adverse construction emissions and fugitive dust.

RK recommends that appropriate mitigation measures, if any, should be identified to protect the adjacent homes from construction emission and fugitive dust.

Noise

1. Page 82 – Environmental Setting: Existing Noise Environment. Project noise level impacts are analyzed to the adjacent single family homes located to the north and east of the site. However, no noise monitoring done at or around this site. In order to provide accurate information of the existing baseline conditions and future noise level impacts to the adjacent residential homes, the noise study should be revised to include ambient daytime noise monitoring at the property line of the adjacent homes.
2. Page 85 – Construction Equipment: The IS/MND states that “short-duration noise levels of up to 85 dBA at 50 feet. The report shows that the Project Related Construction Noise is calculated from the center of the project site. However,

construction activities will likely occur throughout the project site and the report should show the worst case noise impacts to the noise sensitive receptors located as close as 25 feet to the project boundary.

3. On Page 86 – Table 7 Project-Related Construction Noise dBA Leq: The IS/MND shows the Project-Related Construction Noise levels at 330 feet from the residential homes and 350 feet from the Torrey Pines Extension State Park & Trail. However, as previously stated, residential homes are located less than 25 feet from the site to the north. Additionally, construction activity is expected to be less than 85 feet from the eastern residential homes and less than 100 feet from the Torrey Pines Extension State Park & Trail. Therefore, the study fails to indicate the worst case noise levels at the noise sensitive land uses and additional noise level impacts are likely greater than what has been reported in the IS/MND.

RK recommends the project provide additional analysis of worst case construction noise levels at noise sensitive locations.

4. Page 86 – Residential Receptors: The IS/MND indicates that “As shown in Table 7, average noise levels would not exceed 75 dBA Leq at the nearest residential property line. This would result in less-than-significant impact to the surrounding residential receptors.”

As explained in Comment 3, construction activities are expected to occur less than 25 feet from the northern residential homes and less than 85 feet from the eastern residential homes. There is a potentially significant impact to the noise levels experienced at these residential homes and RK recommends the project provide additional analysis of worst case construction noise levels at noise sensitive locations.

If the project is unable to meet the 75 dBA Leq standard set by both San Diego’s Municipal Code and *CEQA Significance Determination Thresholds* guidance document, the project shall provide the necessary mitigation measures to reduce construction noise levels at the adjacent residential sensitive locations.

5. Page 86 – Torrey Pines Extension State Park: The IS/MND indicates that “Average construction noise could reach up to 70 dBA Leq at the Gully Trail, which abuts school property to the south. Construction noise levels are not anticipated to exceed 75 dBA Leq at Torrey Pines Extension State park and boarding trails. Therefore, this would be less-than-significant impact.”

As explained in the above Comment 3, the construction activities are expected to occur at less than 100 feet from the Torrey Pines Extension State Park & Trail and may have a potentially significant effect in this area.

If the project fails to meet the 75 dBA Leq standard set by both San Diego's Municipal Code and *CEQA Significance Determination Thresholds* guidance document, the project shall provide the necessary mitigation measures to reduce construction noise levels at the adjacent noise sensitive locations.

6. Page 87 – Operational Noise – Traffic Noise: The IS/MND states that “The proposed project would expand the parking lot and add a drop-off/pick-up lane along the east and southeast portion of the site.... Traffic noise would not significantly increase above existing conditions and impacts would be less than significant.” The IS/MND further indicates that the traffic noise associated with the expansion of the parking lot would not significantly increase above existing conditions and impacts would be less than significant.

However, no existing ambient noise level measurements were provided at the nearest sensitive noise receptors in order to make a determination of baseline conditions. If the project were to expand the parking lot and add a drop-off/pick-up lane along the east and southeast portion of the site, there may be a potentially significant effect resulting from the additional vehicle movement and parking lot activity that may occur on-site, instead of at other off-site locations where parents may be picking up their kids now.

Therefore, it is recommended that the project conduct and report the existing daytime ambient noise measurements and analyze the change in ambient noise levels due to the project's traffic.

Additionally, the report should provide all calculation sheets with respect to operational noise levels due to traffic noise.

7. Page 88 – Mechanical Equipment: The IS/MND indicates that “At that distance, HVAC noise levels would attenuate to 38 dBA or less ... This impact would be less than significant.” The IS/MND does not provide locations of the proposed HVAC units on-site nor provide the calculation sheets to satisfy the above made statement. Therefore, RK is unable to verify the noise level impact from new HVAC equipment.

The project should compare the future operational noise impact from the new mechanical equipment to the existing ambient noise levels to determine whether any change in existing conditions would occur. To adequately identify the potential impact, the project should conduct and report the existing daytime ambient noise

levels at the adjacent residential homes and provide noise calculation sheets for the stationary equipment.

Additionally, the report should provide all calculation sheets with respect to operational noise levels from mechanical equipment.

As good practice, all mechanical equipment and HVAC units should be fully shielded from line of sight of adjacent property lines.

Transportation

1. Page 98 - Traffic Conditions During Student Transfer: RK has a number of comments on the transportation assessment related to the impacts around the Del Mar Heights School, Del Mar Hills Academy and Communities located to the east along Carmel Valley Road which will provide access to the existing Ocean Air Elementary School. As will be discussed later the traffic impacts caused by the redistribution of project traffic needs may result in significant environmental effects and further assessment and potentially additional mitigation measures are needed to reduce the impacts to the residential communities around these areas.
2. Page 98 – Methodology: The traffic analysis only reviewed traffic impacts at a total of three intersections in the vicinity of the Del Mar Hills Academy and Ocean Air School. RK has identified the several issues with respect to the assumed redistribution of traffic to these other schools and the need to assess additional intersections, especially with respect to the Ocean Air Elementary School.
3. Page 99, Table 10 - Study Area Intersections: Additional study area intersections are needed along Carmel Mountain Road to fully assess the redistribution of traffic and buses to the Ocean Air Elementary School. RK recommends that the intersections of Carmel Mountain Road at Carmel Creek Road, and Carmel Mountain Road at Ocean Air Drive also be included in the analysis as a result of the redistribution of project traffic, and the use of additional buses. There are significant intersections along Carmel Mountain Road that would be impacted by the additional traffic from the Del Mar Heights School reconstruction.
4. Page 100 - Existing Traffic Volumes: It was not documented if the traffic counts that were obtained in February 2020 were done when school was in full session. Since no traffic count worksheets were provided as part of the ISO/MND, the date of the counts cannot be determined. Therefore, it cannot be verified whether school was in session during these counts, and that they did not occur during atypical school schedules. This needs to be clarified to ensure that the analysis is assessing the proper traffic volumes for Existing Conditions.

5. Page 101, Figure 12 - Study Area Streets and Intersections and Page 102, Figure 13 – Existing Traffic Volumes: RK recommends that the intersections of Carmel Mountain Road at Carmel Creek Road, and Carmel Mountain Road at Ocean Air Drive be added to the study area. These major intersections are directly impacted by the rerouting of traffic and required bus traffic to the Ocean Air Elementary School.
6. Page 105, Table 12 – Existing Intersection Levels of Service: No HCM (Highway Capacity Manual) worksheets were provided as part of the IS/MND. The last paragraph of Page 105 indicates that the average values for vehicles on all four approaches were used in the Traffic Impact Analysis. Without having copies of the HCM worksheets, it's not possible to determine whether appropriate PHF (Peak Hour Factor) adjustments were made as part of the analysis. This is typically required, especially in areas in the vicinity of schools where peak 15-minute traffic volumes occur within the peak hour. This needs to be verified and if PHF factors were not used they need to be used for determining the delay and Level of Service.
7. Page 106, Table 13 - Project Generated Traffic: The traffic generation of the additional bus traffic needs to be considered in the traffic analysis. Furthermore, bus trips need to be converted to PCE's (Passenger Car Equivalents) to adequately assess the impacts of the redistribution of project traffic and the use of buses taking access to the Del Mar Hills Academy and the Ocean Air Elementary School.

Furthermore, it appears that the District is proposing to load and unload 4th-6th grade students who will be transported to the Ocean Air School at a location adjacent to the Del Mar Hills Academy. As a result of additional school traffic, on street parking and residential driveway access, has the District considered an alternative staging area instead of the Del Mar Hills Academy? Perhaps an alternative location not located in a residential neighborhood would be more appropriate to load and unload students that won't directly impact the adjacent neighborhoods from the additional traffic and buses. Furthermore, as previously noted the impact of buses in terms of additional traffic, converted to PCE's needs to be considered in the Traffic Impact Analysis.

8. Page 109, Table 15 – Project Impact on Intersection Levels of Service: As previously noted at least two additional intersections along Carmel Mountain Road which provide access to the Ocean Air School should be included in the Traffic Impact Analysis.
9. Page 110 - Environmental Analysis: This discussion indicates there is lengthy queuing and delays on southbound Mango Drive at the intersection of Mango Drive at Del Mar Heights Road. As a result of existing traffic congestion in the vicinity of

the Del Mar Hills Academy, an alternative staging area for students being transferred by bus should be considered by the District. As a result of the site constraints at the existing on-site parking lot and drop off areas, this is an additional reason for considering an alternative staging area which is not located directly in a residential neighborhood to accommodate the additional bus traffic.

10. Page 111, Figure 14 – Projected Generated Traffic: For the redistribution of traffic to the Del Mar Hills Academy, the 15% distribution to the south of Del Mar Heights Road appears to be too low given the location of the students that attend the existing Del Mar Heights School. Furthermore, the 5% distribution to the north of the Del Mar Academy appears to be unrealistic given the attendance area of the Del Mar Heights School.

The distribution of traffic to the Ocean Air Elementary School to the east of Center Heights Drive along Carmel Mountain roads of 35% is unrealistic. The vast majority of traffic that will be redistributed from the Del Mar Heights School including automobiles and buses would come from the west of Center Heights Drive along Carmel Mountain Road. The 35% distribution to and from the east of Center Heights Drive does not appear to be realistic.

11. Page 113, Figure 15 – Existing Plus Project Traffic Volumes: Again, as previously mentioned, the project traffic needs to be revised and distributed as noted in Comment 10. Also, the traffic project trip generation needs to be adjusted to account for bus traffic converted to PCE's.
12. Page 115 - Site Access and Circulation Del Mar Hills Academy: Again, the potentially significant impacts of the bus traffic need to be assessed both to/from the Del Mar Hills Academy and Ocean Air School. This was not included in the Traffic Impact Analysis.

The potential bus staging at the Del Mar Hills Academy School along Mango, north of the school driveway is heavily impacted by parked vehicles. The use of this area as a bus loading and unloading zone would eliminate a substantial amount of existing on-street parking that is currently utilized by the school and the adjacent residential neighborhood. Also, for that location, buses returning back to Del Mar Heights Road would require that buses travel through the existing residential neighborhoods in this area causing additional impacts that are not needed

For the potential bus staging area to the south of the Del Mar Hills Academy School driveway, there is currently a red curb zone and existing major driveway to the Bella Del Mar Apartments. Bus parking in this area would cause congestion and sight distance problems at this driveway.

There may be a potentially significant impact as a result of these factors and for the safety to the students, an alternative staging area, outside of the existing impacted area around the Del Mar Hills Academy School, needs to be located for the bus traffic which won't impact the existing residential neighborhood.

13. Page 115 - Summary of Temporary Conditions: All the traffic that would be generated by the project would not totally represent new traffic; however, it does represent a major diversion of traffic and additional bus traffic into residential neighborhoods. Furthermore, it could add additional potentially significant impacts to study area intersections that need to be reassessed, based upon a more realistic distribution of project traffic and with consideration of the impacts of the bus traffic. The analysis of the three study area intersections needs to be expanded to further review traffic impacts along Carmel Mountain Road, including the redistribution of project traffic including buses. The document only indicates that Levels of Service for study area intersections would remain at acceptable levels; however, this needs to be evaluated based upon the Comments in this letter. A review of the trip distribution, addition of bus trips, the use of a proper peak hour factor (if not already used in the analysis), and consideration of the relocation of the bus staging area all need to be addressed along with the evaluation of additional study area intersections.
14. A Construction Traffic Impact Analysis was not provided as part of the IS/MND. Potentially significant traffic impacts during construction need to be assessed with respect to workers, deliveries, construction vehicles and other activities that will occur during the various phases of construction. All truck related traffic needs to be converted to PCE's to properly assess the potential trip generation that would occur during construction. Since construction could occur between 7 AM and 7 PM, it would likely impact the PM peak hour (4-6 PM) which has not been assessed in the Traffic Impact Analysis. An evaluation of the amount of construction traffic needs to be determined to fully assess the construction impacts of the project.

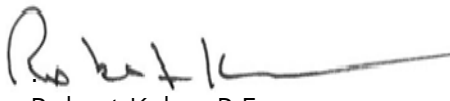
Conclusions

RK Engineering Group Inc. (RK) has reviewed the IS/MND air quality, noise and transportation impacts of the proposed reconstruction the Del Mar Heights School. Based upon this review, RK has identified a number of potentially significant impacts and technical issues that need to be addressed prior to considering the environmental review as being complete.

As a result of this these comments, the CEQA assessment of the project needs to be reassessed to analyze the technical deficiencies and potentially significant impacts raised herein. Of particular concern are the impacts that will occur during the 14 months of construction, and the relocation of all of the students from the Del Mar Heights School.

If you have any questions, please call me at (949) 474-0809.

Sincerely,
RK ENGINEERING GROUP, INC.


Robert Kahn, P.E.
Founding Principal


Bryan Estrada
Senior Associate


Darshan Shivaiah
Environmental Specialist II



Registered Civil Engineer 20285
Registered Traffic Engineer 0555

Attachment
RK15872.DOC
JN: 1900-2020-01

EXHIBIT C

Quality Transportation Solutions

Why Choose RK?

- Innovation
- Experience
- Reputation
- Expertise
- Creativity
- Client Satisfaction



RK Solutions



Transportation Planning

Traffic Impact Studies
Transportation Planning
Transportation Demand Management
Homeowner Association Traffic Review
Parking Demand Studies
Engineering and Speed Surveys
Traffic Calming



Traffic Engineering & Design

Traffic Signal & Signing/ Striping Plans
Traffic Control Plans
Traffic Engineering Studies
Parking Lot Layouts
Traffic Calming Design
Traffic Signal Coordination Analysis
Routes to School



Environmental Engineering

Noise and Air Quality Studies
Sound Barrier Analysis
General Plan Noise
& Air Quality Elements
Noise Ordinance Compliance
Room to Room Acoustical Analysis
Noise and Air Monitoring/ Analysis

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Quality Transportation Solutions

Community Traffic Calming

Besides its power to improve the livability of a neighborhood, the beauty of traffic calming is that it can be applied **economically** and **flexibly** to meet the individual needs of a community. The goal of traffic calming is to make our streets **safer** and more **comfortable** for all users and residents.

Homeowner Association Reviews
Traffic Control Review
Speed Limit Review
Traffic Calming
Planning/ Design
Community Parking Studies
Pedestrian Facilities
Sight Distance Review
Signing and Striping Design



Traffic Calming is a system of **design and management** strategies that aim to **balance** traffic on streets with other uses. It is founded on the idea that people should be able to walk, meet, play, shop and even work alongside cars - but not dominated by them.

**RK Can Utilize These
Tools to Create a
Custom Solution to
Maximize Effectiveness
Within a Community**

- Road Humps, Speed Tables, and Traffic Cushions
- Striping to narrow the perceived width of the street.
- Diagonal/Parallel Parking
- Widening Sidewalks/Narrowing Streets and Traffic Lanes
- Bulbs - Chokers - Neckdowns
- Chicanes
- Roundabouts /Traffic Circles
- Raised Medians
- Tight Corner Curbs
- Diverters
- Pavement Texture (Pavers or Stamped Concrete/Asphalt)
- Changing One-Way Streets to Two-Way
- Road Closures

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Quality Transportation Solutions

Traffic Signal Timing and Coordination

Linking signals along a corridor reduces stop-and-go driving, benefiting air quality and public safety.

The goal of signal coordination is to significantly reduce air pollution, stops, delays, driver frustration and fuel consumption by **optimizing** the travel times, safety and traffic flow along arterial corridors. Traffic signal timing and coordination provides the opportunity to operate traffic signal systems in an **efficient and effective** manner.

Mobility

Synchronized traffic signals reduce delay by limiting stop-and-go traffic.

Air quality

Less stop-and-go traffic results in lower vehicle emissions.

Cost effectiveness

Coordinating traffic signals cost much less than adding lanes to improve the flow of traffic.



"Five percent of congestion is due to poorly timed traffic signals. Stop-and-go traffic increases air pollution and gas consumption, produces greater wear and tear on vehicles, and costs people and businesses money in the delay it imposes. In addition, poorly timed signals limit the capacity of the roadway, creating unnecessary congestion."

– Federal Highway Administration

**RK Can Utilize These
Tools to Create a
Custom Solution to
Maximize Effectiveness
for a Single Traffic
Signal or an
Entire Corridor**

- Perform Synchro/SimTraffic Modeling and Optimize Traffic Signal Timing
- Review Existing Equipment to Update and Upgrade Traffic Signal Systems
- Update Timing Plans to Minimize Delay and Improve Traffic Operations
- Design Traffic Signal Interconnect Plan Systems
- Design Traffic Signal System Master Plan to Improve Traffic Operations
- Identification of Traffic Signal Controller to Improve Traffic Operations
- Design Traffic Surveillance and Control System
- Implement Traffic Signal Timing Plans in the Field
- Prepare "Before and After" Timing Reports
- Analyze High Accident or Inefficient Intersections

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Quality Transportation Solutions

Acoustical Engineering

Acoustical Engineering improves the quality of life inside a community by providing solutions to everyday community and environmental noises. Sound is abundant in most aspects of the modern world. Acoustics is the field of science which studies sound and vibration. RK's Acoustical Engineering team craft **noise relief solutions** to resolve problematic noise levels.

- EIR Noise Studies
- Noise Contour Analysis
- Noise Exposure Maps
- Noise Impact Studies
- Noise Measurements
- Airport/ Land Use Compatibility
- Sound Barrier Analysis
- Noise Elements
- Noise Prediction and Modeling
- Problem Solving
- Community and Environmental Noise Planning
- Stationary Source Noise Analysis
- Noise Ordinance Compliance



Noise pollution, also called environmental noise in technical venues, is **displeasing** sounds created by human or machine sources that disrupt the environment. RK utilizes noise mitigation strategies that are designed to **reduce** unwanted environmental **sound** which allows people to live harmoniously within their environment.

Experience: 700+ solutions

RK Engineering has worked on over 700 projects involving Acoustical Engineering. Robert Kahn, P.E. has been designated as a Certified Acoustical Engineer (No. 112-88) in the County of Orange. RK has completed hundreds of noise studies for many of Southern California's leading developers, builders, and public agencies. RK strives to develop cost effective solutions to community and environmental noise problems

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Quality Transportation Solutions

Safe Routes to School

Safe Routes to School is designed to encourage children to walk and bike to school through **education, encouragement, and engineering**. From promoting the initiative at schools and completing the grant application to traffic engineering and infrastructure improvements, RK along with its affiliates can help school districts facilitate the process of bringing a Safe Routes to School Program to their community. Having been successfully implemented in hundreds of communities throughout California and the United States, Safe Routes to School has **decreased traffic and pollution and increased the health and safety of children and the community**.

Solutions for:

- Designated safe routes to school plans
- Speeding/reckless driving in school zone
- Unsafe parking and drop-off/pick-up practices
- Long traffic queuing and backup during drop-off/pick-up times
- School bus loading zone conflicts and double parking
- Unclear school area signs and crosswalks with low visual impact and recognition
- Poorly maintained/faded crosswalks and signs
- Improving children's safety to enable more bicycling and walking



In 1994, 806 children ages fifteen and younger were killed and 30,000 were injured as pedestrians. That equals an average of 86 children killed or injured each day.

Children aged five through fifteen represent only 16 percent of the U.S. population. Yet they accounted for 30 percent of all pedestrian injuries in 1994.

– Federal Highway Association

RK Offers these Services to Get Your Children To and From School Safely and Efficiently

- Safe Route to School Plans
- Crosswalk Studies
- Internal Traffic Circulation Review
- Traffic Calming
- Parking studies
- Stop Warrant Analysis
- Traffic Signal Warrant Analysis
- In-Pavement Crosswalk Lighting
- Intersection Reviews for those with high accident rates.

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Quality Transportation Solutions

Traffic Control Plan Design

Worksite traffic control plans are designed to **direct** vehicular and pedestrian traffic around a construction zone, accident or other road disruption, thus **ensuring the safety** of emergency response teams, construction workers and the general public.

Worksite Traffic Control Plans

Detour Plans

Special Event Plans

On-Site Traffic Control Management

On-Site Spot Safety Inspections

Pedestrian and Bicycle Traffic Control Plans



RK has traffic control experts who can professionally design traffic control plans tailored to your project's needs. We offer detailed plans for road detours, special events, and phased construction zones to move traffic safely through the work area, while protecting those working on the project. RK's plans are certified by Licensed Civil Engineers, ensuring a professional and thorough design.

**RK Can Utilize
These Tools
to Ensure
Safety and
Protection
at Your
Work Site**

- Spot Checks: Morning, Afternoon and Night
- Road Closures
- Flagging Operations
- Merging and Shifting
- Taper Calculations
- Traffic Control Consultation
- Identify Safety Needs
- Buffer/Work Area Calculations
- Worker Safety Considerations
- Temporary Striping/ Pavement Markings
- Temporary Signals
- Traffic Control Devices: Advance Warning Signs, Changeable Message Signs/ Arrowboards, Flashing Beacon, K-Rail/ Channeling Devices, Crash Cushions
- Barricades Type II and Type III with Signage
- California Manual on Uniform Traffic Control Devices (CA MUTCD)
- Work Area Traffic Control Handbook (WATCH)

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Ease your Traffic Trouble!

Need an Effective Traffic & Parking Plan?

Traffic Troubles? Parking Problems?

RK has the answer! **Get traffic at your facility moving** with a customized Traffic & Parking Management Plan.

Ease frustration from employees, visitors and your community by implementing an effective traffic and parking management plan.



RK Engineering Group, Inc. (RK) is a full service transportation engineering firm that designs strategies to effectively manage traffic flow and parking demand for vehicles arriving and departing your facility.

Proven Results of RK's Customized Traffic and Parking Management Plans

- Reduce traffic speeds
- Lessens impact on local residents and businesses
- Improves pedestrian movements
- Effectively reduces queuing and waiting times for visitors arriving and departing your facility
- Maximizes available on-site parking
- Improves environmental emissions at your site with less vehicle queuing and idle time.

RK's Innovative Engineering "Tool Box"

- Conduct On-Site Evaluations to determine existing conditions
- Design customized Traffic and Parking Management tools that are appropriate for your specific type of facility, location and peak operation periods.
- Recommend short-term, long-term and special event strategies to improve and maximize effectiveness of vehicles entering, exiting and parking at your facility

RK also provides air quality, noise, transportation planning & traffic engineering design services

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By-Pass Roadblocks with Quality Solutions



Qualifications Statement

- Traffic Impact Analysis
- Circulation Planning
- Transportation Demand Management
- Transit Planning
- Parking Studies
- Environmental Engineering
- Traffic Engineering

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Qualifications Statement

RK engineering group, inc. uniquely combines engineering expertise and professionalism with creative thinking and innovative problem solving. The result is an extraordinary transportation engineering firm that possesses the requisite expertise as well as the ability to look across disciplinary boundaries for solutions others may overlook.

This innovative approach is evident by the breadth of services available to RK engineering group, inc.'s diverse clientele that includes regional governments, counties, cities, special districts, school districts, community associations, private developers and contractors, engineering and planning firms. Each client receives what RK engineering group, inc. is known for...on time, on target, on budget professional service.

The Complete Range of Transportation Engineering Expertise

RK engineering group, inc. is a complete transportation engineering firm offering the full range of services including:

- Transportation Planning
- Traffic Engineering
- Traffic Impact Studies
- Circulation Elements
- Transit/Pedestrian Systems
- Parking Studies
- Traffic Signal and Signing/Striping Plans
- Traffic Control Plans
- Street Lighting Plans
- Community Traffic Calming
- Traffic Signal Timing

RK engineering group, inc. also integrates transportation, air quality and noise impacts into environmental engineering services including:

- Acoustical Studies
- Sound Barrier Analysis
- Noise Elements
- Noise Ordinance Compliance
- Air Quality Studies

The Right Personnel for the Job

RK engineering group, inc.'s staff represent more than 70 years of cumulative experience in traffic engineering and related disciplines.

Beyond this experience, RK engineering group, inc. personnel are recognized leaders in the fields of transportation planning, traffic impact analysis, circulation planning, multi-modal planning, parking studies, and environmental engineering.

The combination of this experience and expertise means that major program assignments and small technical studies are all successfully completed to the satisfaction of RK engineering group, inc.'s clientele.

Quality Work Attracts Quality Clients

Perhaps the best measure of a firm's capabilities is the quality of the clientele it attracts. RK engineering group, inc. is pleased to count among its satisfied clientele the Orange County Transportation Authority, and the Transportation Corridor Agencies as well as the counties of Orange and Riverside.

Municipal clients have included the cities of Canyon Lakes, Huntington Beach, Irvine, Mammoth, Mission Viejo, Moreno Valley, Murrieta, Newport Beach, Perris, Rancho Santa Margarita, and San Juan Capistrano. Institutional clientele have included a range of school districts as well as respected institutions like the University of California, Irvine; Pomona College, Western State University College of Law, and California Baptist College. Community Association clients include the CZ Master Association in Coto de Caza, Aliso Viejo Community Association and numerous other associations.

RK engineering group, inc.'s client list also includes more than 500 private sector companies ranging from developers and engineers to urban planners.

Qualifications Statement

Traffic Impact Analysis

RK engineering group, inc. staff have prepared several hundred traffic impact studies throughout Southern and Central California, as well as Southern Nevada, Arizona and Colorado. Work products provided by the firm includes conceptual planning/feasibility studies or detailed design recommendations. The firm can evaluate both existing conditions and the effects of future development upon infrastructure requirements. RK engineering group, inc. staff have prepared numerous studies in compliance with Congestion Management Program (CMP) requirements.

RK engineering group, inc. responsibilities can include representing clients at Board of Supervisors, City Council and Planning/Traffic Commissions meetings; serving as a liaison with company/public agency representatives on technical matters involving traffic impacts; working with County, regional and state agencies to secure government approvals and funding for projects; and interfacing with other firms to provide coordination of engineering/planning and design of projects.

Circulation Planning

RK engineering group, inc. has a broad range of experience including city general plan circulation elements, specific plans, traffic control assessments for special attractions or major events, site access evaluations, traffic management plans and fee program studies.

RK engineering group, inc. services include the preparation of neighborhood traffic management plans to reduce volumes on residential streets, minimize vehicle speeds, and address "cut through" traffic issues. Traffic calming solutions which have been addressed are based on design and management strategies that aim to allow safer neighborhoods for residents. These solutions include roundabouts, street closures, speed humps, chokers, and access restrictions.

RK engineering group, inc. also provides services for school districts. These services include, but are not limited to sidewalk improvements, pedestrian and bicycle crosswalks, traffic control devices as well as diversion of traffic. Also, other services may include revising and recommending feasible school circulation as well as parking lot design for designation of "pick-up" and "drop-off" parking zones. This service is intended to provide a safe route of travel and a safe traffic environment for children attending schools.

Transportation Demand Management

Transportation demand management (TDM) strategies designated for local government action have taken on increased importance in light of federal conformity requirements. Many local governments have adopted trip reduction ordinances to comply with the state and federal mandates. RK engineering group, inc. has prepared TDM plans for industrial, office, retail and residential projects throughout Southern California. RK engineering group, inc. services include the determination of appropriate transportation control measures as well as project-specific implementation and monitoring strategies.

Transit Planning

The increasingly intermodal aspects of regional and local transportation are being addressed by RK engineering group, inc. on an integrated basis. RK engineering group, inc. staff have prepared detailed studies of on-road and rail transit services, including corridors and stations.

RK engineering group, inc. has provided assessments of the location, design and travel patterns associated with commuter rail stations in Orange County, San Bernardino County and Kern County. Accommodations for public transportation services, such as bus turnouts and pedestrian access linkages, have been incorporated into many large and small development projects based upon RK engineering group, inc. inputs.

Qualifications Statement

Parking Studies

RK engineering group, inc. has completed a number of parking studies for residential, commercial and industrial developments. Studies have included evaluating existing parking demand and the assessment of "shared parking" through the use of ULI shared parking evaluation procedures. Parking management plans have been developed to control parking for high parking generators (i.e. large institutional uses and special events including raceways and concerts).

RK engineering group, inc. develops creative and innovative methods for maximizing the efficiency of available parking resources.

Re-evaluating existing parking facility designs to improve circulation, safety, modify control operations and maximization of parking spaces is also a specialty of the company.

Environmental Engineering

As communities continue to evolve and develop, environmental noise and air quality impacts are a potential by-product of community expansion. RK engineering group, inc. services include EIR air/noise studies, noise contour analysis, noise exposure maps (NEM), air/noise impact studies, community and environmental air/noise planning and noise mitigation design. The effects of traffic on noise and air quality are a significant by-product of roadway design. Robert Kahn, P.E. a Certified Acoustical Engineer (No. 112-88) in the County of Orange and is supported by Michael Dickerson, INCE (Institute of Noise Control Engineers) member. RK engineering group, inc. services include acoustical studies, truck mix studies, noise control assessments and noise mitigation design.

RK engineering group, inc. uses "state of the art" computer modeling to project noise impacts and also has the equipment to perform field measurements.

Traffic Engineering

RK engineering group, inc. provides a full range of traffic engineering capabilities including the design of traffic signals, signing and striping, street lighting and worksite traffic control plans. RK engineering group, inc. also provides studies for traffic signal warrants, weaving analysis, intersection safety studies and many other traffic engineering services that also include, but are definitely not limited to, pedestrian/ bicycle studies, warrant analysis, CA MUTCD compatibility and sight distance reviews. Work products provided by the firm can include concept plans, improvement plans, construction documents, traffic safety/traffic control studies and recommendations with respect to evaluating traffic control devices and other roadway design features. Traffic design plans are prepared using AutoCAD software to easily interface with other project plans. RK engineering group, inc. can prepare engineering studies to identify appropriate speed limits based upon radar speed surveys. Field review of existing conditions is an important element of the RK engineering group, inc. design process.

RK engineering group, inc. provides services for traffic signal timing and coordination in linking traffic signals along a corridor. The goal of traffic signal coordination is to safely optimize driver travel times and traffic flow along arterial corridors. This efficient method of operating traffic control systems not only benefits public safety but also benefits air quality resulting from lower emissions from decreased stop-and-go traffic. Traffic signal timing and coordination is a beneficial and cost effective method that increases driver mobility while also reducing air pollution. By providing traffic signal and coordination services, RK engineering group, inc. continues to aid cities and agencies in effectively reducing traffic congestion delay and air pollution.

RK engineering group, inc. responsibilities can also include providing complete traffic engineering plans, specifications and cost estimates; evaluating existing traffic conditions, including traffic control devices; recommending appropriate speed limits based upon radar speed studies, accident history and existing physical conditions; reviewing the need for traffic control devices; sight distance evaluations, including before and after project implementation; evaluation of the need for speed humps as an appropriate roadway design feature and other traffic engineering functions.

Areas of Expertise

Traffic Engineering
Transportation Planning
Transportation Solutions
Traffic Impact Analysis
Circulation Systems for Planned Communities
Traffic Control Device Warrants
Traffic Calming
Traffic Safety Studies
Bicycle Planning
Parking Demand Studies
Transportation Demand Management
Traffic Signal, Signing and Striping Plans
Traffic Control Plans
Parking Lot Design
Acoustical Engineering
Noise Impact Studies
Expert Witness Services

Professional History

RK Engineering Group, Inc.
2001-Present

RKJK & Associates, Inc., Principal, 1990-2000

Robert Kahn and Associates, Inc., Principal, 1988-1990

Jack G. Raub Company,
Vice President Engineering Planning, 1977-1988

The Irvine Company, Program Engineer, 1972-1977

Caltrans CA Division of Highways, Assistant Engineer, 1968-1972

Representative Experience

Robert Kahn, P.E., has worked professionally in traffic engineering and transportation planning since 1968. He received his master of science degree in civil engineering from the University of California, Berkeley, Institute of Transportation and Traffic Engineering. Mr. Kahn received his bachelors degree in Civil Engineering from the University of California, Berkeley.

Mr. Kahn started his career in California Division of Highways (Caltrans) and developed the first computerized surveillance and control system for the Los Angeles area. Mr. Kahn developed the California Incident Detection Logic which is utilized throughout California for the detection of traffic incidents on the freeway system.

Mr. Kahn has worked for a major land development company preparing Master Plans for infrastructure. He also has worked eleven years with a multi-disciplined consulting engineering firm in charge of the Engineering Planning Department. This included all facets of preliminary design, tentative map preparation, transportation and environmental engineering, and public agency coordination.

Mr. Kahn has provided traffic and transportation services to major planned communities including Aliso Viejo, Coto De Caza, Foothill Ranch, Highlands Ranch in Denver, Colorado, Mission Viejo, Talega Planned Community in San Clemente, and Wolf Valley Ranch in Temecula. He has also provided contract traffic engineering services to the Cities of Irvine, Norwalk, Perris and San Jacinto in Riverside County, California.

Mr. Kahn has prepared traffic impact studies for numerous communities throughout Southern California, Nevada and in Colorado. Major traffic impact studies include the Aliso Viejo Town Center, the Summit Development, the Shops at Mission Viejo, Kaleidoscope, Dana Point Headlands, Foothill Ranch, Talega, Majestic Spectrum, and Centre Pointe in the City of Chino.

His work in the area of parking demand studies and parking lot design has been extensive. Shared parking studies for the Aliso Viejo Town Center, Foothill Ranch Towne Centre, Trabuco Plaza and numerous commercial sites have been completed to accurately determine the peak parking demand for mixed use projects. Mr. Kahn has been able to make the most efficient utilization of parking lots by maximizing efficient and safe systems.

Robert Kahn, P.E., T.E

Principal

Education

University of California, Berkeley, M.S., Civil Engineering, 1968

University of California, Berkeley, B.S., Civil Engineering, 1967

University of California, Los Angeles, Graduate Courses in Transportation Systems, 1970

Registrations

California Registered Civil Engineer
No. 20285 – April 1971

California Registered Professional Engineer
Traffic, No. 0555 – June 1977

Colorado Professional Engineer
No. 22934, November 1984

Nevada Professional Engineer Civil
No. 10722 – March 1994

County of Orange, California Certified Acoustical Consultant
No. 201020 - 1984

Affiliations

Institute of Transportation Engineers (ITE)

American Society of Civil Engineers (ASCE)

Urban Land Institute (ULI)

Orange County Traffic Engineers Council (OCTEC)

Teaching

UCI Graduate Urban Design Studio Class – Guest Instructor

ITS Berkeley – Tech Transfer
Fundamentals of Traffic Engineering – Instructor

UCI Senior Civil Engineering Mentoring Program

Mr. Kahn has been an innovator in developing and implementing traffic calming techniques. Over twenty years ago, Mr. Kahn refined the design and implementation standards for speed humps for use in local neighborhoods. Most recently, he has been involved in the development of modern roundabouts in lieu of traffic signals or other traffic control devices at intersections. Mr. Kahn previously presented the use of traffic calming devices in newly developing communities to the Institute of Transportation Engineers Traffic Calming Conference in Monterey, California.

Mr. Kahn has been involved in the design of traffic signal systems, signing and striping plans on hundreds of projects for both the public and private sector. Most recently, he has completed the design of several traffic signals which will serve the renovated Shops at Mission Viejo Mall. Mr. Kahn was in charge of a major ITS project for the City of Irvine, which provided fiberoptic interconnect and closed circuit TV along Barranca Parkway, Alton Parkway and Lake Forest Drive.

Mr. Kahn has been involved in acoustical engineering since 1978. He was in responsible charge of the Aliso Viejo Noise Monitoring Program which redefined the 65 CNEL noise contours for MCAS El Toro. He has also developed computer applications of the FHWA Noise Model.

Mr. Kahn has prepared numerous noise impact reports in the Aliso Viejo, Mission Viejo, Foothill Ranch, Santa Margarita, Ladera and Talega Planned Communities. Noise impacts from stationery sources including car washes, loading docks, air conditioning compressors, drive-thru speakers and other sources have been evaluated in the Aliso Viejo Auto Retail Center Noise Study, Albertsons Store 606 Noise Study-Rancho Cucamonga, Pro Source Distribution Building Final Noise Study in Ontario. Major specific plan and zone change noise studies have been prepared for the Summit Heights Specific Plan in Fontana, Lytle Creek Land and Resources Property in Rialto, Tamarack Square in Carlsbad, California, International Trade and Transportation Center in Kern County, California, and Sun City/Palm Springs.

Mr. Kahn founded the firm of Robert Kahn and Associates in 1988, which was the predecessor to RKJK & Associates, Inc. in 1990. He has made presentations to the ITE and the California Public Works Conference. Mr. Kahn has published numerous articles on traffic impact assessment, traffic calming, striping and the status of Bicycle Sharing in the USA.

Robert Kahn, P.E., T.E.

Principal

Robert Kahn has been involved in numerous legal cases as an expert witness and providing legal assistance in the area of traffic and environmental engineering. This has included traffic/parking impact analysis, traffic/circulation/parking impacts of ROW takes, traffic engineering design review, traffic safety studies and noise/vibration impact assessments. A sampling of these projects include the following cases:

- Tustin Avenue/Rose Drive Grade Separation Impact to Del Cerro Mobile Estates, City of Placentia
- 9582 Chapman Avenue – ULI Shared Parking, City of Garden Grove
- Plantation Apartments Norwalk 12809 Kalnor Avenue I-5 Construction Noise Monitoring Assessment
- City of Huntington Beach vs. Alvarez, et al, Traffic Review of ROW taking
- Gene Autry Way Extension – Impacts to Anaheim Holiday Inn and Staybridge Suites Hotel, Anaheim
- UCSD Student Center Traffic and Parking Impact Review, City of San Diego
- Palma De La Reina Traffic Impact Analysis Review
- Newport Tech Center Traffic Study Review, Newport Beach
- City of Irvine Planning Area 18, 34 and 39 DEIR Traffic Impact Review, City of Irvine
- City of San Diego Big Box Ordinance, City of San Diego
- City of Yucaipa Big Box Ordinance, City of Yucaipa
- Electra Real Estates USA Mid Coast Corridor Transit Project Traffic/Circulation and Parking Impact Review, City of San Diego
- Rancho El Revino Specific Plan Traffic Impact Study Review
- President Hotel Santa Ana parking lot dispute
- Caceres vs. City of Fontana, represented City in an Intersection (Production at Santa Ana Ave.) Accident
- Caronna vs. City of Fontana, represented City in an Intersection (Sierra Ave. and Summit Ave.) Accident

Rogier H. Goedecke

President

Areas of Expertise

Business Development
Corporate Management
Financial Review & Analysis
Sales & Marketing
Project Management
Traffic Impact Analysis
Parking Demand Analysis

Education

B.S. International Marketing & Sales Management. Southern Illinois University at Carbondale, 1996

Professional History

RK Engineering Group, Inc.,
President
2006 to Present

Segue Corporation
Vice President, Corporate Development
2005-2006

Goedecke and Assoc. Inc.
Partner / Vice President
1996-2005

Affiliation and Awards

American Planning Association Member
City of Aliso Viejo Planning Commission Member (2007-2010)
Urban Land Institute Member (2005-Current)
Distinguished Alumni Guest Speaker at the SIU College of Business
World University Games competitor, Long Distance Swimming

Representative Experience

As President, Rogier Goedecke brings over 20 years of business development and managerial experience to RK Engineering Group, Inc. His commitment to superior customer service and team leadership is evident in his experience in global operations and management within the IT industry.

Mr. Goedecke is responsible for directing RK's strategic plans and integrating advanced solutions in order to better serve clients and enhance RK's market presence. In addition, Mr. Goedecke is also responsible for overall business operations, business development and marketing at RK, as well as, overseeing project management for the Transportation Planning and Environmental divisions of the firm.

During his career, Mr. Goedecke was most recently Vice President of Corporate Development and was responsible for expanding business opportunities by building mutual partnerships and exclusive contracts. Prior to that experience, he was a partner in a premier worldwide computer and communications equipment distributor. Since its inception in 1995, it grew to include locations in the USA, The Netherlands and Australia and served the needs of Fortune 100 companies, such as: NCR, HP, Unisys and IBM.

Mr. Goedecke regularly lectures at universities on current issues in Business and Customer Service and has published articles in professional trade journals on Management and Logistics. At the Visionary Selling to Executives Conference, he was honored to receive a commendation for excellence.

Mr. Goedecke has managed Traffic Impact Studies, Parking Demand Analysis, Traffic Calming etc. for RK throughout Southern California and successfully coordinated RK's staff efforts for comprehensive analysis, mitigation and study preparation all while maintaining RK's mission to provide clients with accurate, on-time and on-budget service.

Mohammad “Alex” Tabrizi, P.E., T.E. Associate Principal Engineer

Areas of Expertise

Traffic Engineering
Transportation Planning & Engineering
Traffic Impact Analysis
Transportation Demand Management Plans & Strategies
Due Diligence Studies
Traffic Signal Timing & Progression Analysis
Site Access, Wayfinding & Circulation System Design & Review
Project & Infrastructure Phasing
Roundabout Analysis
Traffic Control Device Warrants
Traffic Calming & Traffic Safety Studies
Parking Demand Studies
Traffic Control Plans
Parking Lot Design

Professional History

RK Engineering Group, Inc.
2014-Present

RBF Consulting, Associate, 2005-2014

Urban Crossroads, Inc., Engineering Aide, 2003-2005

Education

University of California, Irvine, B.S., Civil Engineering, 2005

Registrations

California Registered Civil Engineer
No. 78923 – December 2011

California Registered Traffic Engineer
No. 2722 – December 2014

Affiliations

American Society of Civil Engineers (ASCE)

Orange County Traffic Engineers Council (OCTEC)

Representative Experience

Alex Tabrizi, P.E., T.E., has worked professionally in the field of traffic engineering and transportation planning/engineering since 2003. He received his bachelor's degree in civil engineering with an emphasis on structural engineering from the University of California, Irvine.

Mr. Tabrizi has extensive experience in providing transportation planning and engineering consulting services and expertise to a wide range of clients including private sector, land developers, public agencies, various districts of California Department of Transportation (Caltrans), and local governments. Mr. Tabrizi has completed and supervised preparation of hundreds of complex transportation planning and parking demand/utilization studies over the past decade with a successful track record in providing innovative, cost-effective and practical technical consulting services and solutions for politically sensitive, complex, and unique projects involving numerous stakeholders and requiring to meet accelerated project schedules.

Mr. Tabrizi has performed transportation planning studies dealing with various stages of project development, such as signal warrant analysis, circulation analysis, full traffic impact analysis, roundabout analysis and parking studies. He has prepared traffic flow visual simulations combining measured vehicular and pedestrian volumes with aerial imagery to show existing and future traffic circulation for public understanding and discussion.

Mr. Tabrizi has also completed a number of transportation engineering and roadway design projects ranging from preparing preliminary studies and reports such as Caltrans Project Reports (PR) and City street improvement concepts to final construction plans, specifications, and cost estimates for Caltrans highway improvement projects.

Mr. Tabrizi is knowledgeable in computer applications for transportation engineering and planning, including, AutoCAD, Microstation with InRoads, Traffix, HCS, Synchro/SimTraffic, and aaSIDRA.

Allison Kahn Goedecke, M.B.A. Senior Transportation Planner

Areas of Expertise

Transportation Planning

Parking Studies

Education

Oxford University
Certificate in Global Management
2002

Pepperdine University
M.B.A.
Master of Business Administration
With Honors, 2002

University of California, Irvine
B.A., Economics
Summa Cum Laude, Phi Beta Kappa
1997

Professional History

RK Engineering Group, Inc.
Transportation Planner
2001 - Present

RKJK & Associates, Inc.
Project Manager
1998 - 2001

Light & Associates, Inc.
Account Executive
1997 - 1998

RKJK & Associates, Inc.
Administrative Assistant
1991 - 1997

Affiliation and Awards

Phi Beta Kappa (B.A.)

Beta Gamma Sigma Scholastic
Honor Society (M.B.A.)

Representative Experience

Allison Goedecke has worked professionally in transportation planning since 1998 and in the building industry since 1991.

Ms. Goedecke received her MBA from Pepperdine University where she prepared a strategic analysis for entrepreneurial engineering firms as a part of her final project. After graduation, Ms. Goedecke was invited to earn a certificate in Global Management from Oxford University in England.

Ms. Goedecke has experience in managing and performing traffic impact analysis and parking studies for both residential and commercial developments. Prior to her work in the transportation engineering field, Ms. Goedecke was an advertising account executive for new home builders, which was instrumental in her learning to build successful consultant-client relationships and provided a valuable perspective on the building industry.

While working as a Transportation Planner on projects throughout the Southern California area, Ms. Goedecke has performed analyses of traffic study areas and developed mitigation measures to improve level of service and traffic operation within the surrounding areas. Her project experience includes performing traffic signal warrants, parking studies, HCM and ICU analysis, determining fair-share contributions, and crafting innovative solutions to mitigate traffic impacts throughout project development communities.

Ms. Goedecke's recent projects include: The Marble Mountain/Moffett Meadows Access Study (Lennar Homes), Murrieta Spectrum Traffic Impact Study, United Auto General Plan Traffic Impact Study, Target Huntington Beach Traffic Impact Study, and the Artesia Oasis Shared Traffic Impact Study.

Throughout her career, Ms. Goedecke has demonstrated excellence in project leadership, divergent problem solving and dedication to client satisfaction.

Bryan Estrada, AICP, PTP

Senior Associate

Areas of Expertise

Transportation and Environmental Planning
Traffic Impact Studies
Air Quality Analysis
Greenhouse Gas/Global Climate Change Analysis
Environmental Acoustics/Noise Analysis
Parking
CEQA Compliance
Synchro Traffic Analysis Software
California Emissions Estimator Model (CalEEMod)
FHWA Noise Modeling
SoundPlan Software

Education

University of California, Irvine
B.A., Urban Studies
California Air Resources Board, Air Quality Training Program
Geo Instruments Vibration Monitoring Short Course

Professional History

RK Engineering Group, Inc.
Senior Associate
2007 - Present

Affiliations

American Planning Association (APA)
Association of Environmental Professionals (AEP)

Representative Experience

Mr. Bryan Estrada is a native of Southern California and also stayed in the area by attending the University of California, Irvine where he received a Bachelor of Arts degree in Urban Studies. Mr. Estrada's multidisciplinary background is concentrated around current transportation challenges and their physical, economic, and environmental impacts on urban areas. Mr. Estrada is committed to solving problems related to sustainable community development and environmental design.

Since 2007, Mr. Estrada has gained experience in the many aspects of Transportation and Environmental Planning while working with RK Engineering Group. He is an active member of the American Planning Association (APA) and the Association of Environmental Professionals (AEP), and stays up to date on the latest trends and topics concerning CEQA policy. He is frequently engaged with local government agencies, community groups, and developers to help to craft innovative solutions to mitigate traffic, noise and air quality impacts throughout project development communities.

Mr. Estrada's experience includes traffic/transportation planning, air quality and greenhouse gas analysis, and environmental acoustics/noise analysis. He has also contributed to the design and construction of traffic signal plans, signing and striping plans and traffic control plans. He is regularly out in the field performing assessments and inventories of project sites and meeting with community stakeholders.

Mr. Estrada works on transportation and environmental planning projects that range from focused site-specific technical studies to regional and General Plan level analyses. His recent work includes Mixed Use Development projects in Downtown Huntington Beach, the City of Aliso Viejo General Plan Update and Aliso Viejo Town Center Vision Plan, Eleanor Roosevelt High School eStem Academy Traffic Impact Study and On-Site Circulation Plan (Eastvale, CA), Great Wolf Lodge Resort (Garden Grove, CA), Starbucks Coffee Shops (multiple locations through Southern California), Paradise Knolls Specific Plan (Jurupa Valley, CA), Vista Del Agua Specific Plan (Coachella, CA), and Monterey Park Hotel Mixed Use Development Project (Monterey Park, CA).

Mr. Estrada has obtained the American Institute of Certified Planners (AICP) certification granted by the American Planning Association and the Professional Transportation Planner (PTP) certification granted by the Transportation Professional Certification Board.

Jethro Jay Narciso, E.I.T.

Engineer

Areas of Expertise

Transportation Planning
Transportation Engineering
Transportation Demand Management
Traffic Impact Analysis
Parking Studies
Queuing Studies
Acoustical Studies
Computer Aided Drafting (AutoCAD)
Traffix (Traffic Analysis Software)

Education

University of California, Irvine
B.S., Civil Engineering
Specialization in Transportation Systems Engineering

Professional History

RK Engineering Group, Inc.
Engineering Aide
2015 - Present

RCE Consultants, Inc.
Intern
2014 - 2015

Representative Experience

Mr. Jethro Jay Narciso is a native of Southern California and also stayed in the area by attending the University of California, Irvine where he received a Bachelor of Science degree in Civil Engineering, with a specialization in Transportation Systems Engineering. Mr. Narciso's diverse background in his education and career has allowed him to gain an understanding of current transportation challenges and their solutions.

Since 2015, Mr. Narciso has gained experience in the many aspects of Transportation Engineering and Transportation Planning while working with RK Engineering Group. He has analyzed traffic data for future projects and assisted with the development of mitigation measures to improve level of service and traffic operations within the surrounding roadway networks. He has also performed analyses of parking and queuing scenarios and has assisted with the development of mitigation measures to improve circulation and traffic operations within the project area and its surrounding areas. In addition, he has also conducted several acoustical studies and has crafted mitigation measures to meet the standards of particular jurisdictions and agencies.

Mr. Narciso's experience includes traffic impact reports, parking studies, queuing studies, and acoustical studies. He regularly performs field assessments and inventories of project sites. He has also contributed to the design and construction of traffic signal plans, signing and striping plans and traffic control plans.

Mr. Narciso is currently pursuing his Professional Engineering license.

Darshan Shivaiah, M.S

Environmental Specialist

Areas of Expertise

Acoustical Studies
Air Quality Studies
Transportation Planning
Transportation Engineering
Transportation Demand Management
Traffic Impact Analysis
Queuing Studies
SoundPLAN (Acoustical Modelling Software)
CalEEMod
Computer Aided Drafting (AutoCAD)
Traffix (Traffic Analysis Software)

Education

University of California, Irvine
M.S., Environmental Engineering
Specialization in Air Quality and Water & Wastewater Engineering

Professional History

RK Engineering Group, Inc.
Engineer
2018 - Present

LA Regional Water Quality Board
Intern
2017

Representative Experience

Mr. Darshan Shivaiah is a native of Southern California and also stayed in the area by attending the University of California, Irvine where he received a Master of Science degree in Environmental Engineering, with a specialization in Air Quality and Water & Wastewater Engineering. Mr. Shivaiah's diverse background in his education and career has allowed him to gain an understanding of current environmental and transportation challenges and their solutions.

Since 2018, Mr. Shivaiah has gained experience in the many aspects of Environmental Engineering, Transportation Engineering and Transportation Planning while working with RK Engineering Group. He has analyzed several acoustical and air quality studies and has crafted mitigation measures to meet the standards of particular jurisdictions and agencies. He has also performed analyses of parking and queuing scenarios and has assisted with the development of mitigation measures to improve circulation and traffic operations within the project area and its surrounding areas. In addition, he has also analyzed traffic data for future projects and assisted with the development of mitigation measures to improve level of service and traffic operations within the surrounding roadway networks.

Mr. Shivaiah's experience includes acoustical impact analysis, air quality and greenhouse gas reports, traffic impact reports, parking studies and queuing studies. He regularly performs field assessments and inventories of project sites.

Mr. Shivaiah is currently pursuing his E.I.T license.

EXHIBIT D

Del Mar Heights Elementary

School Accountability Report Card Reported Using Data from the 2018—19 School Year California Department of Education

By February 1 of each year, every school in California is required by state law to publish a School Accountability Report Card (SARC). The SARC contains information about the condition and performance of each California public school. Under the Local Control Funding Formula (LCFF) all local educational agencies (LEAs) are required to prepare a Local Control and Accountability Plan (LCAP), which describes how they intend to meet annual school-specific goals for all pupils, with specific activities to address state and local priorities. Additionally, data reported in an LCAP is to be consistent with data reported in the SARC.

- For more information about SARC requirements, see the California Department of Education (CDE) SARC web page at <https://www.cde.ca.gov/ta/ac/sa/>.
- For more information about the LCFF or LCAP, see the CDE LCFF web page at <https://www.cde.ca.gov/fq/aa/lc/>.
- For additional information about the school, parents/guardians and community members should contact the school principal or the district office.

DataQuest

DataQuest is an online data tool located on the CDE DataQuest web page at <https://dq.cde.ca.gov/dataquest/> that contains additional information about this school and comparisons of the school to the district and the county. Specifically, DataQuest is a dynamic system that provides reports for accountability (e.g., test data, enrollment, high school graduates, dropouts, course enrollments, staffing, and data regarding English learners).

Internet Access

Internet access is available at public libraries and other locations that are publicly accessible (e.g., the California State Library). Access to the Internet at libraries and public locations is generally provided on a first-come, first-served basis. Other use restrictions may include the hours of operation, the length of time that a workstation may be used (depending on availability), the types of software programs available on a workstation, and the ability to print documents.

Mr. Jason Soileau, Principal

 Principal, Del Mar Heights Elementary

About Our School

The quality of instruction and leadership at Del Mar Heights is excellent due to the cooperative effort of the entire staff and community. Our principal, Jason Soileau, has over 25 years of experience in education and holds a master's degree in Educational Administration/Supervision. Prior to coming to Del Mar Heights, Mr. Soileau worked as an elementary teacher, special education teacher, assistant principal, and principal in both Texas and Louisiana.

Del Mar Heights is guided by shared decision making with all parties. We have weekly staff or Professional Learning Community team meetings. Staff meetings are held bimonthly and all staff participate in ongoing professional learning through our collaborative learning Wednesdays. The School Site Council (SSC), which is represented equally by parents and staff, meets quarterly. Our active PTA provides ongoing support for the total school program. We update our detailed Single Plan for Student Achievement (SPSA) annually. Del Mar Heights teachers develop and align curriculum in accordance with the state framework, model curriculum standards, district policies, and student instructional needs. Del Mar Heights is committed to our District Design 2022, a bold plan that pushes us in an unrelenting pursuit of the extraordinary school experience.

Contact

Del Mar Heights Elementary
13555 Boquita Dr.
Del Mar, CA 92014-3453

Phone: 858-755-9367
Email: jsoileau@dmusd.org

About This School

Contact Information (School Year 2019—20)

District Contact Information (School Year 2019—20)	
District Name	Del Mar Union Elementary
Phone Number	(858) 755-9301
Superintendent	Holly McClurg
Email Address	hmclclurg@dmusd.org
Website	http://www.dmusd.org

School Contact Information (School Year 2019—20)	
School Name	Del Mar Heights Elementary
Street	13555 Boquita Dr.
City, State, Zip	Del Mar, Ca, 92014-3453
Phone Number	858-755-9367
Principal	Mr. Jason Soileau, Principal
Email Address	jsoileau@dmusd.org
Website	www.dmusd.org/heights
County-District-School (CDS) Code	37680566038111

Last updated: 1/7/2020

School Description and Mission Statement (School Year 2019—20)

Built in 1959 and the oldest standing school in Del Mar, Del Mar Heights Elementary School is a safe, attractive learning community composed of 470 students in kindergarten through sixth grade. We celebrate the diversity of our families within our school. An environment of high expectations for social and academic success has created a positive child-centered learning environment that strives to meet the individual needs and talents of each child in order to assist them in reaching their maximum potential. A shared vision of high expectations has empowered our students to consistently perform above the county and state average and exhibit exemplary interpersonal skills in preparation to become leaders in our global society.

The Del Mar Heights certificated staff includes a principal, 22 classroom teachers, and STEAM+ specialist teachers offering instruction in the arts, physical education, science, and technology, 2 special day class teachers, 2 resource specialist teachers, 2 speech and language pathologists, and a school psychologist. Support staff includes an administrative assistant and office assistant, health technician, librarian, school plant manager and night custodian, and 13 instructional assistants. This outstanding, dedicated staff diligently works together to provide support for each child and to promote excellence for the entire school program.

Del Mar Heights has highly qualified, caring teachers and support staff who are fully credentialed and who regularly collaborate using a Professional Learning Community model. Staff regularly attends professional learning trainings and conferences to strengthen their teaching strategies. Teachers work in collaborative teams, planning lessons together, analyzing the results of student assessments, and planning ways to differentiate instruction to meet the needs of individual students.

Shared decision making is the norm at Del Mar Heights. We have weekly certificated staff or Professional Learning Community meetings or trainings. The School Site Council (SSC), comprised of equal representation of parents and staff, meets throughout the year. Our active Parent Teacher Association (PTA) supports the success of all students with total school programming assistance. Del Mar Heights teachers develop and align curriculum in accordance with the state framework, curriculum standards, district policies, and student instructional needs.

Del Mar Heights is focused on creating programs and experiences that honor the intellectual and social/emotional development of the whole child. Our multifaceted programs are designed to provide experiences in art, music, technology, science, and physical education as extensions of the classroom. Classroom teachers work collaboratively with our science lab teacher to offer inquiry-based science lessons.

At Del Mar Heights, we are committed to building and sustaining a collaborative, community of learners among teachers. Teachers within a grade level work together to design students' learning experiences and collaborate with teachers in other grade levels to create an articulated program. The staff as a whole regularly participates in professional learning and engages in dialogue about best practices.

Del Mar Heights School epitomizes a collaborative and dynamic partnership between the students, parents, teachers, and staff. We highly value this relationship and observe daily how powerful it can be when everyone is working together. By capitalizing on our collective talents, our school flourishes. Further school information is available at www.dmusd.org/heights.

School Vision: We will make a positive impact on the world by developing confident, compassionate global leaders.

School Mission: We will provide a dynamic academic environment that ignites and unites the passions of its community to deliver a world class learning experience for every child

Major Achievements – Most Recent Year

Del Mar Heights School is focused on creating programs and experiences that honor the intellectual and social/emotional development of the whole child. Our multifaceted programs are designed to provide experiences in art, drama, music, technology, science, and physical education as extensions of the classroom. Classroom teachers work collaboratively with our science teacher to offer inquiry-based science activities in our Science Lab. Our specialist teachers work collaboratively and dynamically with classroom teachers to create programs that inspire our students through our STEAM+ curriculum.

In addition to the STEAM+ curriculum, students have the opportunity to participate in Dolphin Leadership, Robotics Club, and Mileage and Running Clubs. Each spring our students share their accomplishments at our annual Art Show, Science Fair, and Open House. The entire school community participates in our annual Harvestfest, Winterfest and Dancefest celebrations.

A great strength of Del Mar Heights School is the strong level of parent and community support. Our dedicated volunteers facilitate classroom learning, activities, and events. Most classrooms use volunteers for a variety of support and instructional tasks. Our active PTA is an essential component of this volunteer effort. The PTA's annual sponsorship of activities and programs includes: Arts and Music residencies and assemblies, Drama Production, SciFri, Garden Club, Dads' Club, Fall Harvestfest, Talent Show, Arts Contest, Jogathon, Used Book Fair, Cultural Heights, Understanding Differences, Heights Cares, Countdown to Summer, Technology grants, Staff Appreciation activities, and mini-grants for staff members. The many thousands of hours of volunteer support provided by the PTA helps to create the positive school atmosphere enjoyed at Del Mar Heights School.

Focus for Improvement – Most Recent Year

The Del Mar Heights School Site Council (SSC) and Site Strategic Planning Team meet regularly to monitor progress toward meeting the school's goals. To ensure goals are achieved, all grade levels will do the following:

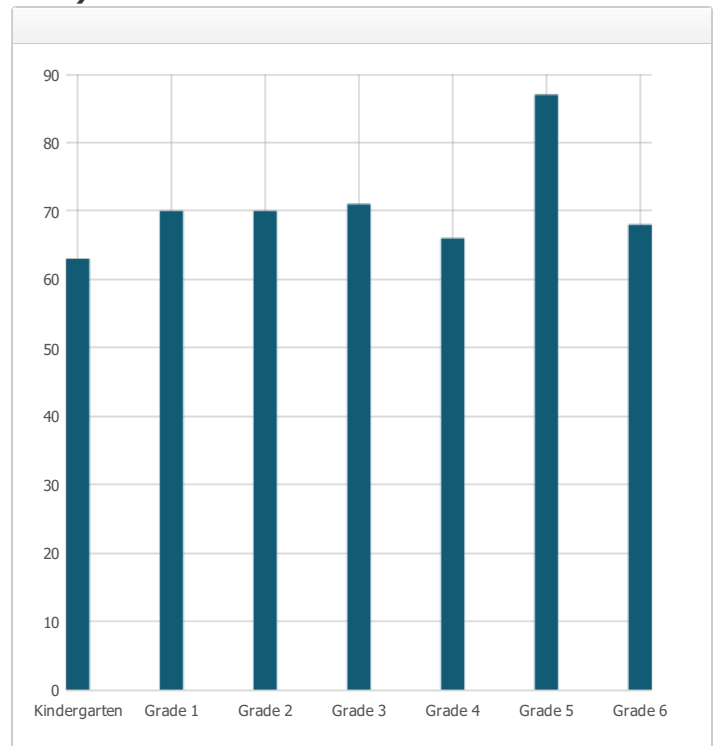
- Regularly analyze student work then share information and strategies to improve consistency of instruction and increase continuity between grade levels.
- Collaborate in Professional Learning Community teams to analyze data, and recommend and implement instructional strategies to challenge students who are achieving at a high level and to support students who are having difficulties.
- Differentiate (customize) instruction to meet the needs of all students. Use technology as an instructional tool.

Our mathematics goals include using common problem-solving strategies and protocols in all classes within and across grade levels, and explicitly teaching mathematical vocabulary. Teachers will continue their professional training in Cognitively Guided Instruction (CGI) to increase their understanding and use of best instructional practices to develop deep mathematical thinking. Our reading goals include: emphasizing reading comprehension strategies through the use of close reading at all grade levels; teaching reading strategies to students in upper grades to support comprehension of expository text, including social studies and science texts; developing vocabulary and using fluency exercises in all classes. Our writing goal focuses on improving writing proficiency in all common core designated genres of writing at all grade levels.

Last updated: 1/7/2020

Student Enrollment by Grade Level (School Year 2018—19)

Grade Level	Number of Students
Kindergarten	63
Grade 1	70
Grade 2	70
Grade 3	71
Grade 4	66
Grade 5	87
Grade 6	68
Total Enrollment	495



Last updated: 1/7/2020

Student Enrollment by Student Group (School Year 2018—19)

Student Group	Percent of Total Enrollment
Black or African American	0.80 %
American Indian or Alaska Native	0.20 %
Asian	10.50 %
Filipino	1.00 %
Hispanic or Latino	8.70 %
Native Hawaiian or Pacific Islander	0.20 %
White	69.70 %
Two or More Races	8.90 %
Student Group (Other)	Percent of Total Enrollment
Socioeconomically Disadvantaged	6.30 %
English Learners	4.00 %
Students with Disabilities	16.00 %
Foster Youth	%
Homeless	%

D. Other SARC Information

The information in this section is required to be in the SARC but is not included in the state priorities for LCFF.

Average Class Size and Class Size Distribution (Elementary) School Year (2016—17)

Grade Level	Average Class Size	Number of Classes * 1-20	Number of Classes * 21-32	Number of Classes * 33+
K	17.00	4		
1	22.00		3	
2	18.00	3		
3	22.00		3	
4	22.00		3	
5	23.00	1	3	
6	24.00		3	
Other**				

* Number of classes indicates how many classes fall into each size category (a range of total students per class).

** "Other" category is for multi-grade level classes.

Average Class Size and Class Size Distribution (Elementary) School Year (2017—18)

Grade Level	Average Class Size	Number of Classes * 1-20	Number of Classes * 21-32	Number of Classes * 33+
K	20.00	1	3	
1	22.00		3	
2	23.00		3	
3	21.00		3	
4	24.00		3	
5	22.00		3	
6	27.00		3	
Other**	10.00	1		

* Number of classes indicates how many classes fall into each size category (a range of total students per class).

** "Other" category is for multi-grade level classes.

Average Class Size and Class Size Distribution (Elementary) School Year (2018—19)

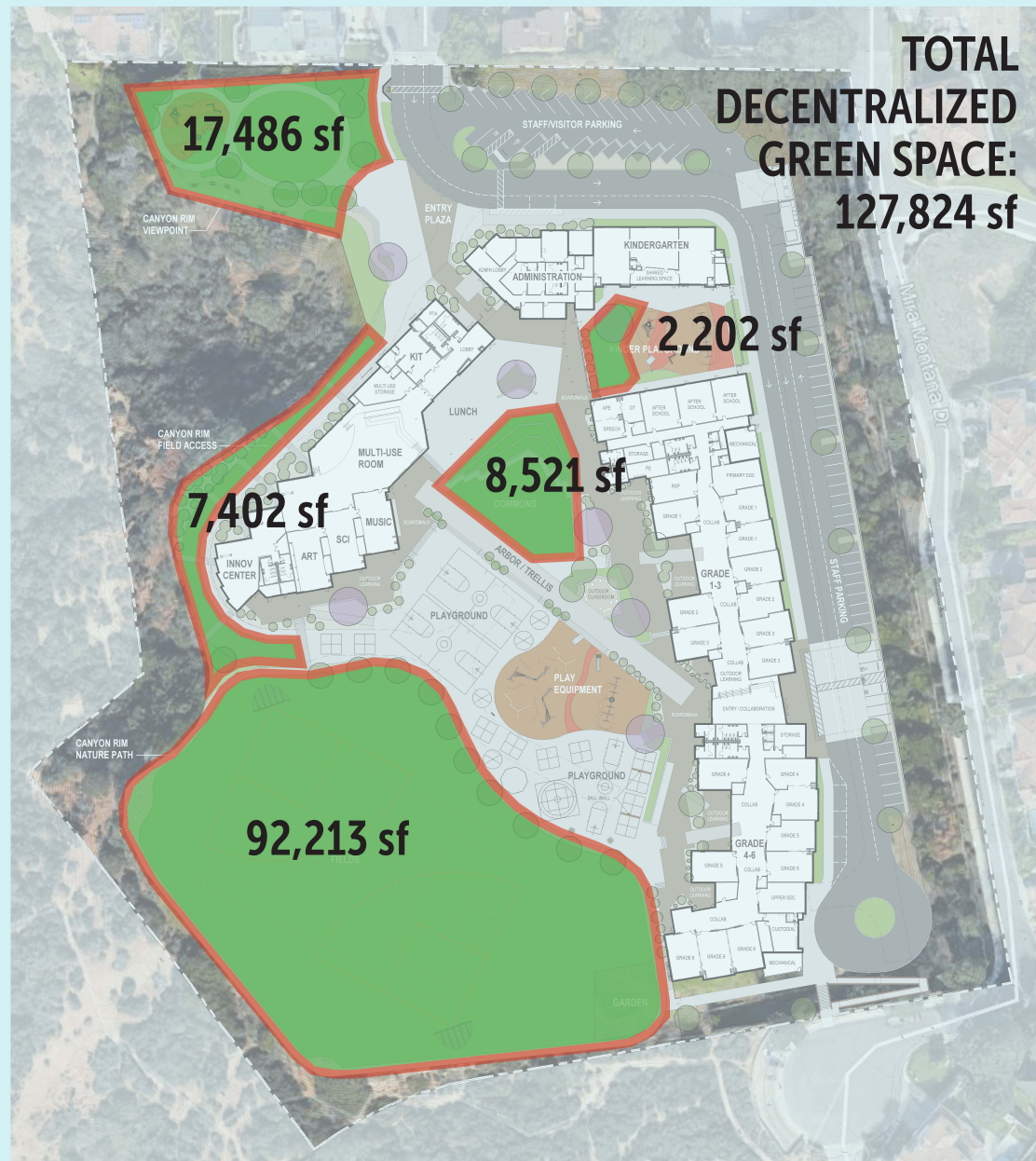
Grade Level	Average Class Size	Number of Classes * 1-20	Number of Classes * 21-32	Number of Classes * 33+
K	20.00	2	1	
1	23.00		3	
2	22.00	1	2	
3	23.00		3	
4	21.00		3	
5	23.00	1	3	
6	23.00		3	
Other**	8.00	1		

* Number of classes indicates how many classes fall into each size category (a range of total students per class).

** "Other" category is for multi-grade level classes.

Last updated: 1/7/2020

EXHIBIT E



Numbers based on survey data received on 10/22/2019

CURRENT SITE PLAN GREEN SPACE