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DEL MAR HEIGHTS SCHOOL REBUILD PROJECT

Del Mar Union School District

Prepared for:

Del Mar Union School District

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Abbreviations and Acronyms

ABBREVIATIONS AND ACRONYMS

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

Abbreviations and Acronyms

CNDDDB	California Natural Diversity Database
CNEL	community noise equivalent level
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalent
Corps	US Army Corps of Engineers
CSO	combined sewer overflows
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dba	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	global warming potential
HCM	Highway Capacity Manual
HQTA	high quality transit area
HVAC	heating, ventilating, and air conditioning system
IPCC	Intergovernmental Panel on Climate Change
L _{dn}	day-night noise level
L _{eq}	equivalent continuous noise level
LBP	lead-based paint
LCFS	low-carbon fuel standard
LOS	level of service
LST	localized significance thresholds
M _w	moment magnitude
MCL	maximum contaminant level
MEP	maximum extent practicable

Abbreviations and Acronyms

mgd	million gallons per day
MMT	million metric tons
MPO	metropolitan planning organization
MT	metric ton
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NO _x	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O ₃	ozone
OES	California Office of Emergency Services
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SIP	state implementation plan
SLM	sound level meter
SoCAB	South Coast Air Basin
SO _x	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board

Abbreviations and Acronyms

TAC	toxic air contaminants
TNM	transportation noise model
tpd	tons per day
TRI	toxic release inventory
TTCP	traditional tribal cultural places
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment

Abbreviations and Acronyms

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1. Executive Summary

1.1 INTRODUCTION

This focused draft environmental impact report (DEIR) addresses the environmental effects associated with the implementation of the proposed Del Mar Heights School Rebuild project. The California Environmental Quality Act (CEQA) requires that local government agencies consider the environmental consequences before taking action on projects over which they have discretionary approval authority. An environmental impact report (EIR) analyzes potential environmental consequences in order to inform the public and support informed decisions by local and state governmental agency decision makers.

Del Mar Union School District (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.

On May 12, 2020, the District adopted a Mitigated Negative Declaration and approved the project. The approvals were challenged (*Save the Field v. Del Mar Union School District*, Case No. 37-2020-00020207-CU-TT-CTL) and the court ruled that three issues required further assessment: 1) Assess the potential impact to Southern Maritime Chapparal habitat and any endangered plant species caused by proposed modification to stormwater outfall pipes, 2) Assess the potential impact of construction noise on adjacent residential sensitive receptors; 3) Assess the potential impact caused by the proposed new stairs and ADA ramp at the southern tip of the campus.

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

This focused DEIR has been prepared pursuant to the requirements of CEQA. The Del Mar Union School District, as the lead agency, has reviewed and revised all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment, including reliance on District technical personnel from other departments and review of all technical subconsultant reports.

Data for this focused DEIR derive from onsite field observations; discussions with affected agencies; analysis of adopted plans and policies; review of available studies, reports, data, and similar literature; and specialized environmental assessments (biological resources and noise).

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1.2 ENVIRONMENTAL PROCEDURES

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

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

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

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

1.2.1 EIR Format

Chapter 1. Executive Summary: Summarizes the background and description of the proposed project, the format of this focused EIR, project alternatives, any critical issues remaining to be resolved, and the potential environmental impacts and mitigation measures identified for the project.

Chapter 2. Introduction: Describes the purpose of this focused EIR, background on the project, the notice of preparation, the use of incorporation by reference, and Final EIR certification.

Chapter 3. Project Description: A detailed description of the proposed project, including its objectives, its area and location, approvals anticipated to be required as part of the project, necessary environmental clearances, and the intended uses of this focused EIR.

Chapter 4. Environmental Setting: A description of the physical environmental conditions in the vicinity of the project as they existed at the time the notice of preparation was published, from local and regional

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perspectives. These provide the baseline physical conditions from which the lead agency determines the significance of the project's environmental impacts.

Chapter 5. Environmental Analysis: Each environmental topic is analyzed in a separate section that discusses: the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the existing environmental setting; the potential adverse and beneficial effects of the project; the level of impact significance before mitigation; the mitigation measures for the proposed project; the level of significance after mitigation is incorporated; and the potential cumulative impacts of the proposed project and other existing, approved, and proposed development in the area.

Chapter 6. Significant Unavoidable Adverse Impacts: Describes the significant unavoidable adverse impacts of the proposed project.

Chapter 7. Alternatives to the Proposed Project: Describes the alternatives and compares their impacts to the impacts of the proposed project. Alternatives include the No Project Alternative.

Chapter 8. Impacts Found Not to Be Significant: Briefly describes the potential impacts of the project that were determined not to be significant by the Initial Study and were therefore not discussed in detail in this focused EIR.

Chapter 9. Significant Irreversible Changes Due to the Proposed Project: Describes the significant irreversible environmental changes associated with the project.

Chapter 10. Growth-Inducing Impacts of the Project: Describes the ways in which the proposed project would cause increases in employment or population that could result in new physical or environmental impacts.

Chapter 11. Organizations and Persons Consulted: Lists the people and organizations that were contacted during the preparation of this focused EIR.

Chapter 12. Qualifications of Persons Preparing EIR: Lists the people who prepared this focused EIR for the proposed project.

Chapter 13. Bibliography: The technical reports and other sources used to prepare this focused EIR.

Appendices: The appendices for this document (in PDF format on a CD attached to the front cover) comprise these supporting documents:

- Appendix 1-1: Initial Study/Mitigated Negative Declaration
- Appendix 1-2: Initial Study/Mitigated Negative Declaration Response to Comments
- Appendix 2-1: Notice of Preparation and NOP Comments
- Appendix 5.1-1: Biological Resources Report
- Appendix 5.2-1: Noise Analysis

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1.2.2 Type and Purpose of This Focused DEIR

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

1.3 PROJECT LOCATION

The approximately 10.85-acre project site encompasses the Del Mar Heights School property at 13555 Boquita Drive in the City of San Diego. The project site consists of Assessor’s Parcel Number (APN) 301-0500-700 and is in Del Mar Heights, a 760-lot subdivision in the Torrey Pines community. The project site is surrounded by Boquita Drive to the north, Mira Montana Drive to the east, and open space canyonlands to the south and west of the project site. The subdivision of Del Mar Heights in the City of San Diego is surrounded by the City of Del Mar to the west and the City of San Diego to the north, east, and south, and is approximately 0.30-mile west of Interstate 5 (I-5). The project site is southeast of Canyon Crest Open Space Park, east and north of Torrey Pines State Natural Reserve, and the City of San Diego’s Multi-Habitat Planning Area (MHPA) is to the west and south of the site. Figure 1-1, *Regional Location*, Figure 1-2, *Aerial Photograph*, and Figure 1-3, *Local Vicinity*, show the project site from its regional and local contexts.

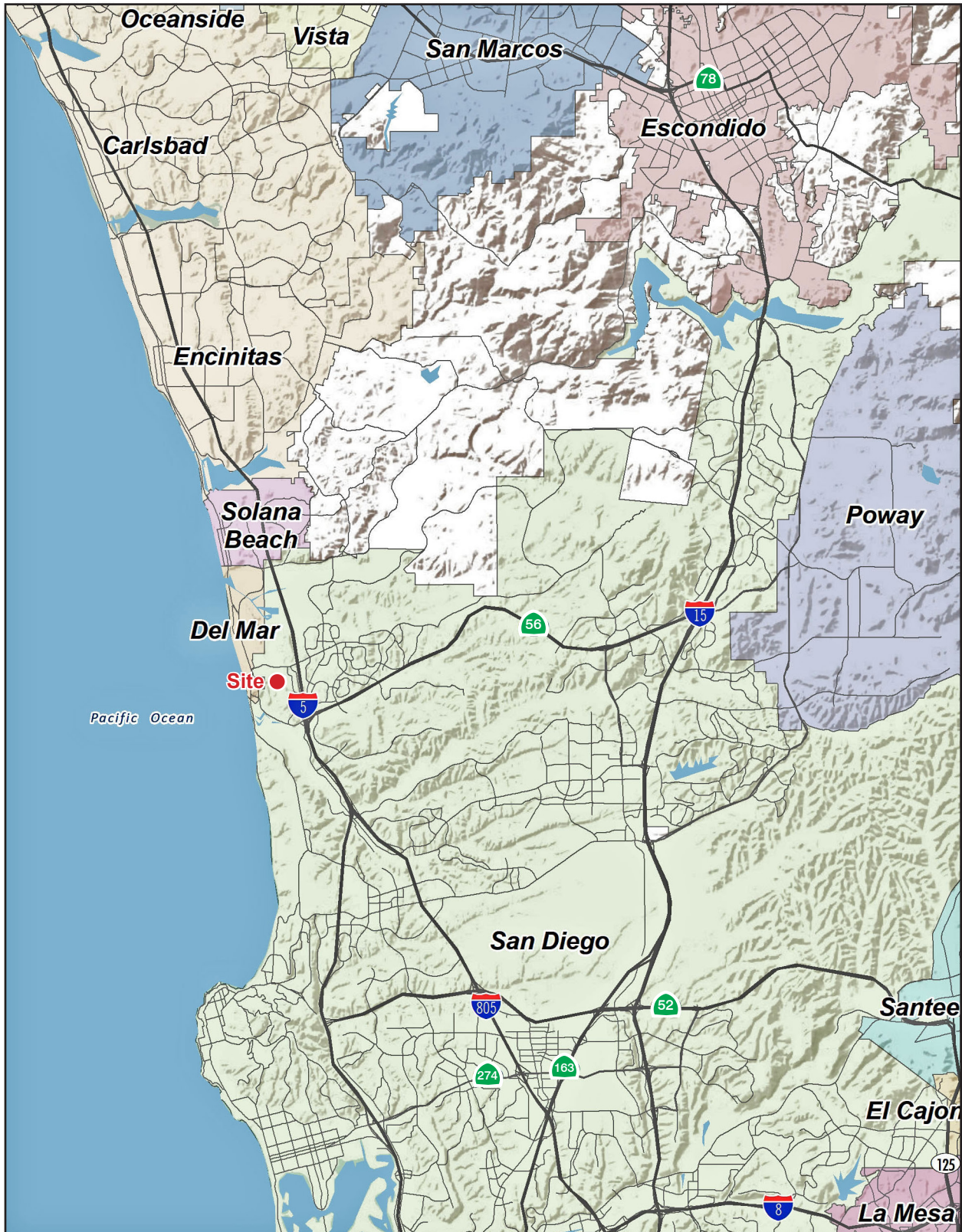
1.4 EXISTING LAND USE

As shown in Figure 1-3, the project site is currently developed as the Del Mar Heights School site. Del Mar Heights School housed 458 K-6 students in the 2019-20 school year and has a capacity to house 559 students. The school includes an administration building, 22 classrooms, and there are 13 full size classroom spaces plus smaller specialized spaces for APE, OT, Psychologist, Speech, PE, and PTA (permanent and portables). The total square footage of the buildings onsite is 48,426 square feet. These structures are located in the northern and eastern portions of the site. The northwestern portion of the site includes play structures; a surface parking lot with 48 spaces at the northeast portion of the site; and the hardcourts and play structures in the central portion of the site, north of the playing field. There is a total of 66,775 square feet of playground space and 167,965 square feet of green space and dirt infield/batting areas. The eastern portion of the site includes a vegetable garden (2,709 square feet) and play structures. The multiuse field is situated in the southern portion of the site.

1.5 PROJECT SUMMARY

Because of the age of the existing facilities, high cost for modernization, inefficient classroom design, and poor site layout related to safety and transportation, the District is proposing to demolish, remove, and reconstruct the Del Mar Heights School. The reconstructed campus would have a central indoor/outdoor hub, an Innovation Center, Modern Learning Studios, and several indoor/outdoor learning environments,

Figure 1-1 - Regional Location
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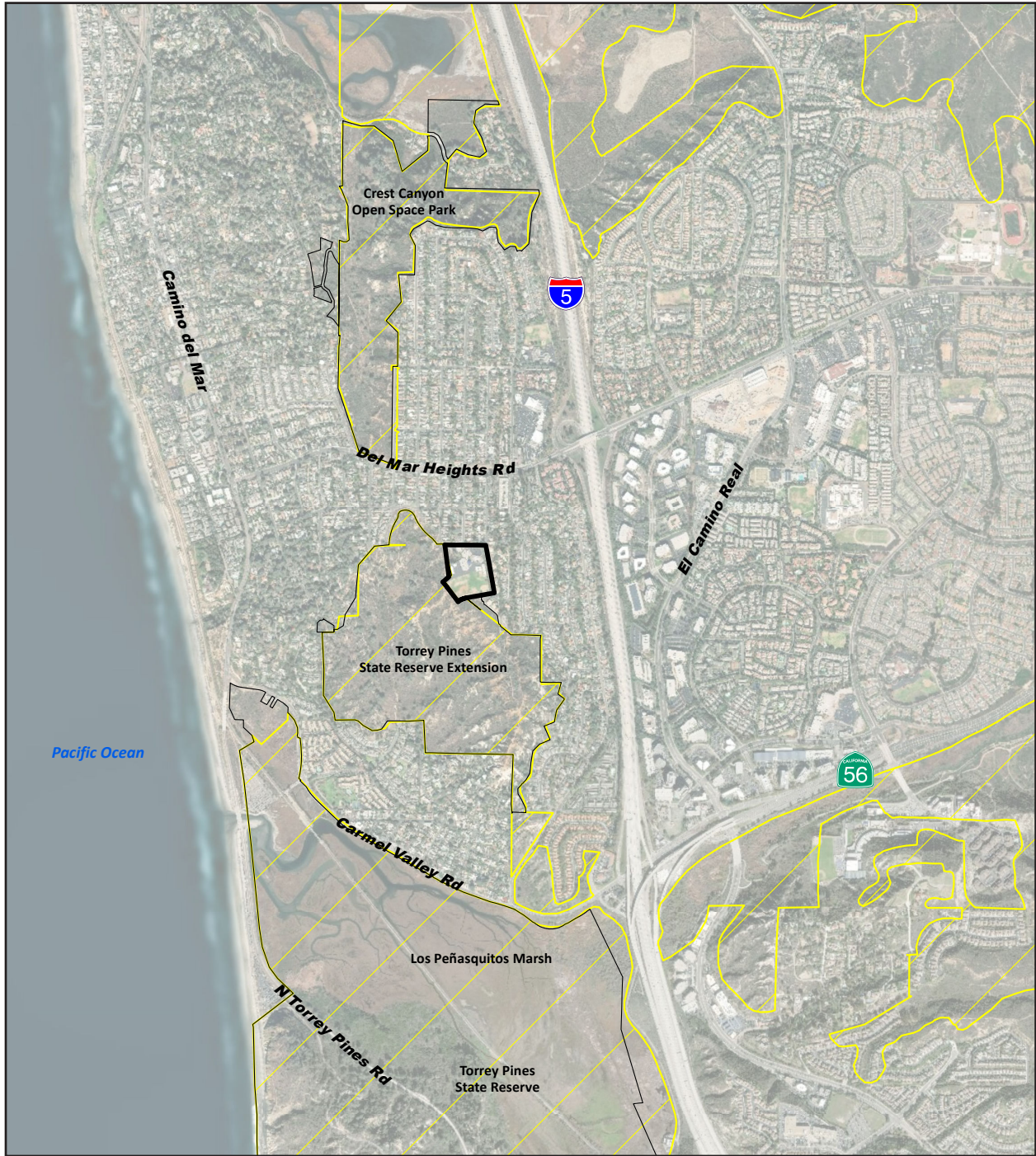
Note: Unincorporated county areas are shown in white.
Source: ESRI, 2019





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Figure 1-2 - Aerial Photograph
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-  Project Boundary
-  City of San Diego Multi-Habitat Planning Area (MHPA)

0 2,500
Scale (Feet)



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Figure 1-3 - Local Vicinity
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--- Project Boundary

0 350
Scale (Feet)



Source: Google Earth Pro, 2019

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along with increased parking spaces, separate drop-off/pick-up zones for kindergarten and main campus (grades 1-6), a larger multiuse space, and enhanced outdoor play areas.

The project components would include three permanent one-story buildings (66,823 sf): multiuse building, administration and kindergarten building, and a grades 1-6 classroom building with 21 classrooms. The campus would also have two turf baseball fields overlapping the multiuse field (108,692 sf), hardcourts and playgrounds (34,546 sf), landscaped and turf areas (25,761 sf), three areas with play structures, vegetable garden (2,714 square feet), lunch shelter, and two parking lots with a total of 80 spaces. Figure 1-4, *Conceptual Site Plan*, shows the proposed reconfiguration and improvements on the site.

1.6 SUMMARY OF PROJECT ALTERNATIVES

The CEQA Guidelines (§ 15126.6 [a]) state that an EIR must address “a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project and evaluate the comparative merits of the alternatives.” The alternatives in this DEIR were based, in part, on their potential ability to reduce or eliminate the impact determined to be significant and unavoidable for implementation of the proposed project. Project alternatives are assessed in further detail in Chapter 7, *Alternatives to the Proposed Project*.

1.6.1 Alternatives Considered and Rejected During the Scoping/Project Planning Process

1.6.1.1 ALTERNATIVE SITE

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

1.6.1.2 STORMWATER CONVEYANCE ALTERNATIVES

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

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

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Regrading Alternative: Another alternative might be to regrade the project site so that stormwater flows north towards Boquita Drive. This would redirect stormwater, and the need for the existing outfalls would be eliminated. The existing outfalls would still require limited repair and revegetation. This alternative would involve significant earth movement to change the natural flow of stormwater, which is now to the west and south. The regrading would also require the construction of retaining walls along the western and southern edges of the site. This would involve regrading of the entire project site and extensive earthmoving activities compared to the limited grading of the proposed project. New impacts would result from this alternative, including increased construction noise, visual impacts from the retaining wall and change in ground elevation, air pollution, and inconsistency with the goals of the Local Coastal Program, such as preserving and enhancing the unique natural environment, and encouraging the development of adjacent properties to be undertaken in a manner that is visibly and physically compatible with the natural environment. Further, this alternative is not necessary because the proposed project would not create a significant biological impact. This alternative is rejected and not addressed further in this EIR.

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

1.6.2 Alternatives Selected for Further Analysis

1.6.2.1 NO-PROJECT ALTERNATIVE

The CEQA Guidelines require the analysis of a No Project Alternative. This analysis must discuss the existing site conditions as well as what would be reasonably expected in the foreseeable future based on any current plans if the project were not approved.

This discussion compares the environmental effects of the campus and school program remaining in their existing condition against the environmental effects if the project were approved. Under the No Project Alternative, Del Mar Heights School would not be rebuilt; the students would return to a campus that needs extensive replacement of plumbing, roofing, and HVAC system; and the stormwater outfall drainages would continue to deteriorate, resulting in further erosion and loss of habitat. No changes to the existing drop-off/pick-up zones would occur.

Figure 1-4 - Conceptual Site Plan
1. Executive Summary



--- Project Boundary

Note: ✖ Stairs and ADA ramp eliminated from project.

Source: Baker Nowicki Design Studio, 2020

0 100
Scale (Feet)



1. Executive Summary

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1. Executive Summary

Overall, this Alternative would be environmentally inferior for biological resources, and would be superior (reduce effects) for noise, when compared to the proposed project. However, this Alternative would not meet any of the project objectives.

1.6.2.2 CAMPUS MODERNIZATION ALTERNATIVE

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

Compared to the proposed project, the Campus Modernization Alternative is environmentally neutral for biological resources, and superior for construction noise

The Campus Modernization Alternative would not meet any of the project objectives; therefore, it is inferior to the proposed project as it relates to achieving the District's project objectives.

1.7 ISSUES TO BE RESOLVED

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

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

1. Executive Summary

1.8 AREAS OF CONTROVERSY

In accordance with Section 15123(b)(2) of the CEQA Guidelines, the EIR summary must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. Prior to preparation of this focused DEIR, an Initial Study/Mitigated Negative Declaration (IS/MND) and final response to comments were distributed in May 2020 (Appendix 1-1 and Appendix 1-2). Several comments were received in regard to the CEQA process, the overall project description, student capacity, aesthetics/lighting, air quality, biological resources, recreation/green space, transportation/emergency access, wildfire, and fair argument (EIR vs. MND/ND). All of the issues were found to be less than significant, or less than significant with mitigation incorporated (see Chapter 8, *Impacts Found Not to Be Significant*); however, due to a court ruling, two topical areas require additional analysis, and this focused DEIR addresses the biological resources and construction noise impacts of the proposed project. The Notice of Preparation (NOP) (Appendix 2-1) was distributed for comment from March 1, 2021, to March 30, 2021. A total of 18 agencies/interested parties responded to the NOP. NOP comment letters received during the review period are summarized in Chapter 2, *Introduction* (see Table 2-1, *NOP Comment Summary*).

1.9 SUMMARY OF ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Table 1-1, *Summary of Environmental Impacts, Mitigation Measures, and Levels of Significant After Mitigation*, summarizes the conclusions of the environmental analysis contained in this focused EIR. Impacts are identified as significant or less than significant, and mitigation measures are identified for all significant impacts. The level of significance after imposition of the mitigation measures is also presented.

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.1 BIOLOGICAL RESOURCES			
Impact 5.1-1: Development of the proposed project would not impact the sensitive southern maritime chaparral, Torrey Pine, wart-stemmed ceanothus, Nutshell's scrub oak, Del mar manzanita and short-leaved dudleya.	Less than significant	No mitigation measures are necessary.	Not applicable
5.2 NOISE			
Impact 5.2-1: Construction activities would result in temporary noise increases and groundborne vibration and noise in the vicinity of the proposed project.	Potentially Significant	N-1 The District shall incorporate the following practices into the construction documents to be implemented by the construction contractor during the entire construction phase of the project: <ul style="list-style-type: none"> ▪ The project sponsor and contractors shall prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the construction drawing set. ▪ At least 30 days prior to the start of construction activities, all off-site residents within 300' of the project site shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. ▪ At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the District. 	Less than significant

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		<ul style="list-style-type: none"> ▪ During the entire active construction period, equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible. ▪ Require the contractor to use impact tools (e.g., jack hammers and hoe rams) that are hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools. ▪ During the entire active construction period, stationary noise sources shall be located as far from sensitive receptors as possible, and they shall be muffled and enclosed within temporary sheds, or insulation barriers or other measures shall be incorporated to the extent feasible. ▪ Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes. ▪ During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. ▪ Temporary noise barriers will be constructed with solid material with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the temporary noise barrier and be lined on the construction side with an acoustical blanket, curtain, or equivalent absorptive material. The locations and heights (8 to 16 feet) of temporary noise barriers are shown in Figure 5.2-11. The District shall verify compliance with this measure prior to the start of major demolition or construction work. Temporary Noise Barrier 1 shall remain up during the building and asphalt demolition phase and the soil nailing and grading phase but will need to be removed during the building 	

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.2-2: Construction activities could create excessive short-term groundborne vibration.		<p>construction phase. Temporary Noise Barrier 2 shall remain up for the entire duration of demolition and construction. Temporary Noise Barrier 3 shall remain up for at least the duration of the building and asphalt demolition phase.</p> <p>N-2 If paving activity during construction is required within 25 feet of nearby residential structures, use of a static roller in lieu of a vibratory roller shall be employed.</p>	Less than significant

1. Executive Summary

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2. Introduction

2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

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

The lead agency means “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment” (CEQA § 21067). The District’s Board of Trustees has the principal responsibility for approval of the Del Mar Heights School Rebuild project. For this reason, the District is the CEQA lead agency for this project.

The intent of the DEIR is to provide sufficient information on the potential environmental impacts of the proposed Del Mar Heights School Rebuild project to allow the Board of Trustees to make an informed decision regarding approval of the project. Specific discretionary actions to be reviewed by the District are described in Section 3.4, *Intended Uses of the EIR*.

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

- California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code, §§ 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations, §§ 15000 et seq.)

The overall purpose of this focused DEIR is to inform the lead agency, responsible agencies, decision makers, and the general public about the environmental effects of the development of the proposed project on biological resources and noise. This focused DEIR addresses effects that may be significant and adverse; evaluates alternatives to the project; and identifies mitigation measures to reduce or avoid adverse effects.

2. Introduction

2.2 HISTORY OF THE INITIAL STUDY

The Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed project (see Appendix 1-1) was released for a 30-day public review period, which began February 20, 2020, and closed on March 30, 2020. Many of the comments from the agencies and individuals identified similar topics: project description (Facilities Master Plan and Del Mar Heights Proposed Site Plan, student capacity, Plan Consistency/Approvals), CEQA Process (Timing of District Meeting, DSA Pre-check Process), Aesthetics (scenic views, lighting), Biological Resources/Stormwater Outfalls, Recreation/Green Space, Transportation/Emergency Access, Wildfire, Adequacy of CEQA document / Fair Argument.

On May 12, 2020, the District adopted a Mitigated Negative Declaration and approved the project. The approvals were challenged (*Save the Field v. Del Mar Union School District*, Case No. 37-2020-00020207-CU-TT-CTL) and the court ruled that three issues required further assessment: 1) Assess the potential impact to Southern Maritime Chapparal habitat and any endangered plant species caused by proposed modification to stormwater outfall pipes, 2) Assess the potential impact of construction noise on adjacent residential sensitive receptors; 3) Assess the potential impact caused by the proposed new stairs and ADA ramp at the southern tip of the campus.

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

All of the issues analyzed in the Initial Study/Mitigated Negative Declaration were found to be less than significant, or less than significant with mitigation incorporated (see Chapter 8, *Impacts Found Not to Be Significant*) with the exception of the two topical areas mentioned in the court ruling—Biological Resources and Noise—and this focused DEIR addresses the biological and construction noise impacts of the proposed project.

2.3 NOTICE OF PREPARATION

The District determined that a focused EIR would be prepared to address two issues that the court ruled as requiring further assessment and issued a Notice of Preparation (NOP) on March 1, 2021 (see Appendix 2-1). Comments received during the NOP's public review period, from March 1, 2021, to March 30, 2021, are in Appendix 2-1.

Table 2-1, *NOP Comment Summary*, summarizes the issues identified by the commenters during the NOP comment period. Table 2-1 provides a brief summary of the comment and a reference to the section(s) of this DEIR where the environmental issue is addressed. A total of 18 agencies/interested parties responded to the NOP. This focused DEIR has taken those responses into consideration when addressing the environmental issues in Chapter 5 of this DEIR.

2. Introduction

Table 2-1 NOP Comment Summary

Commenting Agency/Person	Date	Comment Topic	Comment Summary	Issue Addressed in Chapter/Section:
Agencies				
Native American Heritage Commission - Andrew Green, Cultural Resources Analyst	3/9/21	<ul style="list-style-type: none"> Tribal Cultural Resources 	<ul style="list-style-type: none"> Provides information on AB 52 and SB 18 consultation process. 	<ul style="list-style-type: none"> Chapter 8, <i>Impacts Found Not to Be Significant</i>
City of San Diego, Planning Department - Heidi Vonblum, Deputy Director	3/29/21	<ul style="list-style-type: none"> Issuance of Permits CEQA Determination Thresholds Biological Resources Greenhouse Gases Tribal Consultation Brush Management Watershed Management Area 	<ul style="list-style-type: none"> Asks that the anticipated actions required by the City be listed. States that the City's CEQA Significant Determination Thresholds should be used. States that the biological report should identify environmentally sensitive lands (ESL) and impacts to biological resources in accordance with the City's Biology Guidelines, and states that the project should be evaluated for conformance with the City's Multiple Species Conservation Program Subarea Plan. States that the City does not use a bright-line threshold and that the project should analyze compliance with the City's Climate Action Plan. States that the environmental documents should be distributed to the San Pasqual Band of Mission Indians, Iipay Nation of Santa Ysabel, and Jamul Indian Village. States that brush management should be evaluated as the school is located in a Very High Fire Hazard Severity Zone. States that the environmental document should note that the project site is in the Los Penasquitos Water Management Area. 	<ul style="list-style-type: none"> Chapter 3, <i>Project Description</i> Chapter 5.1, <i>Biological Resources</i> Chapter 8, <i>Impacts Found Not to Be Significant</i> <p>Additional response is provided below.</p>
<p>Response to City of San Diego Planning Department:</p> <ul style="list-style-type: none"> See Section 3.4, <i>Intended Uses of the EIR</i>, for a list of actions required by the City. Although not required under AB 52, the District contacted the San Pasqual Band of Mission Indians, Iipay Nation of Santa Ysabel, and Jamul Indian Village in compliance with AB 52. Section 5.1, <i>Biological Resources</i>, has been updated to mention that the site is within the Los Penasquitos Water Management Area. These issues were addressed in the Initial Study/Mitigated Negative Declaration and response to comments. As indicated by the court ruling, the only topics that require further evaluation are potential impacts to Southern maritime chaparral and any endangered plant species and construction noise to adjacent residential sensitive receptors. 				
Department of Transportation (Caltrans) - Maurice Eaton, Branch Chief	3/29/21	<ul style="list-style-type: none"> Transportation 	<ul style="list-style-type: none"> States that vehicle miles traveled (VMT) based on a Traffic Impact Study (TIS) should be provided for the project. States that the TIS may need to identify near- and long-term safety or operational issues on or adjacent to any existing or proposed state facilities. States that transportation improvements are viewed as opportunities to improve safety, access, and 	<ul style="list-style-type: none"> Chapter 8, <i>Impacts Found Not to Be Significant</i>

2. Introduction

Table 2-1 NOP Comment Summary

Commenting Agency/Person	Date	Comment Topic	Comment Summary	Issue Addressed in Chapter/Section:
			mobility for all travelers. <ul style="list-style-type: none"> States that there is a strong link between transportation and land use. States that Caltrans welcomes the opportunity to be a Responsible Agency under CEQA as Caltrans has some discretionary authority of a portion of the project that is in the Caltrans' right-of-way through the form of an encroachment permit process. States that any work performed within the Caltrans right-of-way will require discretionary review and approval by Caltrans and an encroachment permit. 	Additional response is provided below
		Response to Caltrans: <ul style="list-style-type: none"> Although a TIS was not prepared for the IS/MND, the IS/MND indicated that VMT would temporarily increase due to the relocation of students. However, the implementation of the proposed project would result in the reduction of up to 48 average daily trips compared to existing conditions. The proposed project would not impact state facilities as improvements to the project site would occur within the project boundaries. The proposed project is designed to reduce circulation and congestions issues. The District is proposing to increase onsite parking and lengthen the passenger loading and vehicle queuing zone, to ensure impacts to the neighborhood north of the project site are reduced. The parking lot would be expanded onsite. The project site is not within a Caltrans' right-of-way. The proposed project would implement improvements within the project site boundaries and would not impact Caltrans facilities. 		
California Department of Parks and Recreation - Darren Smith, Senior Environmental Scientist	3/30/21	<ul style="list-style-type: none"> Biological resources 	<ul style="list-style-type: none"> Agrees that further assessment is needed to evaluate potential impacts to Southern Maritime Chaparral habitat and any endangered plant species caused by the proposed modification to the stormwater outfall pipes. States that a focused sensitive plant survey should be completed to better represent the native flora present at the project site. States that the EIR should detail appropriate avoidance, minimization, and mitigation measures associated with working in close proximity to Del mar manzanita and Southern Maritime Chaparral. 	<ul style="list-style-type: none"> Chapter 5.1, <i>Biological Resources</i>
Individuals				
Brooke Beros	2/26/21	<ul style="list-style-type: none"> Access 	<ul style="list-style-type: none"> States that the removal of the stairs on Mira Montana is an unnecessary response to an unfounded concern. States it is unclear why changing the dirt path to the stairs and ramp would increase use of this entrance as it would be easy to lock this entrance to prevent traffic issues. States that the existing gate is currently locked which is inconvenient and asks that the court revise its stance regarding the Mira Montana entrance to permit the stairs and/or ramp for the community. States that during this time of COVID, having difference entrances would minimize contact and 	<ul style="list-style-type: none"> Chapter 3, <i>Project Description</i>

2. Introduction

Table 2-1 NOP Comment Summary

Commenting Agency/Person	Date	Comment Topic	Comment Summary	Issue Addressed in Chapter/Section:
			<p>exposure among students.</p> <ul style="list-style-type: none"> States that in the event of an emergency, it would be useful to have a point of ingress/egress on that side of campus. States that if the removal of the stairs and ramp is warranted, then the commenter hopes that at a minimum, the District will retain the dirt path and gate. 	
Sheila Krishna	3/5/21	<ul style="list-style-type: none"> Biological Resources Noise Transportation 	<ul style="list-style-type: none"> Commenter supports project. States that while further investigation on the potential to impact Southern Maritime Chaparral habitat and any endangered plant species caused by proposed modifications to stormwater outfall pipes is reasonable, the overall rebuild would improve wildlife habitat. States that while the EIR should assess temporary noise impacts during construction, the existing plan does this robustly. States that the previously proposed stairs and ramp at the southern tip of the campus was resolved, and a benefit of removing this proposed entry is enhanced campus security. 	<ul style="list-style-type: none"> Chapter 5.1, <i>Biological Resources</i> Chapter 5.2, <i>Noise</i>
Sandip Patel	3/5/21	<ul style="list-style-type: none"> Biological Resources Noise Transportation 	<ul style="list-style-type: none"> Commenter supports project. States that while further investigation on the potential to impact Southern Maritime Chaparral habitat and any endangered plant species caused by proposed modifications to stormwater outfall pipes is reasonable, the overall rebuild would improve wildlife habitat. States that while the EIR should assess temporary noise impacts during construction, the existing plan does this robustly. States that the previously proposed stairs and ramp at the southern tip of the campus was resolved, and a benefit of removing this proposed entry is enhanced campus security. 	<ul style="list-style-type: none"> Chapter 5.1, <i>Biological Resources</i> Chapter 5.2, <i>Noise</i>
Dan Quirk	3/5/21	<ul style="list-style-type: none"> Biological Resources Noise Transportation 	<ul style="list-style-type: none"> Commenter supports project. States that while further investigation on the potential to impact Southern Maritime Chaparral habitat and any endangered plant species caused by proposed modifications to stormwater outfall pipes is reasonable, the overall rebuild would improve wildlife habitat. States that while the EIR should assess temporary noise impacts during construction, the existing plan does this robustly. States that the previously proposed stairs and ramp at the southern tip of the campus was resolved, and a benefit of removing this proposed entry is enhanced campus security. 	<ul style="list-style-type: none"> Chapter 5.1, <i>Biological Resources</i> Chapter 5.2, <i>Noise</i>

2. Introduction

Table 2-1 NOP Comment Summary

Commenting Agency/Person	Date	Comment Topic	Comment Summary	Issue Addressed in Chapter/Section:
Steve Quirk & Selena Daoust	3/5/21	<ul style="list-style-type: none"> Biological Resources Noise Transportation 	<ul style="list-style-type: none"> Commenter supports project. States that while further investigation on the potential to impact Southern Maritime Chaparral habitat and any endangered plant species caused by proposed modifications to stormwater outfall pipes is reasonable, the overall rebuild would improve wildlife habitat. States that while the EIR should assess temporary noise impacts during construction, the existing plan does this robustly. States that the previously proposed stairs and ramp at the southern tip of the campus was resolved, and a benefit of removing this proposed entry is enhanced campus security. 	<ul style="list-style-type: none"> Chapter 5.1, <i>Biological Resources</i> Chapter 5.2, <i>Noise</i>
Lena Liu	3/11/21	<ul style="list-style-type: none"> Biological Resources Noise Transportation 	<ul style="list-style-type: none"> Commenter supports project. States that while further investigation on the potential to impact Southern Maritime Chaparral habitat and any endangered plant species caused by proposed modifications to stormwater outfall pipes is reasonable, the overall rebuild would improve wildlife habitat. States that while the EIR should assess temporary noise impacts during construction, the existing plan does this robustly. States that the previously proposed stairs and ramp at the southern tip of the campus was resolved, and a benefit of removing this proposed entry is enhanced campus security. 	<ul style="list-style-type: none"> Chapter 5.1, <i>Biological Resources</i> Chapter 5.2, <i>Noise</i>
Frank Stonebanks	3/11/21	<ul style="list-style-type: none"> Biological Resources Noise Transportation 	<ul style="list-style-type: none"> Commenter supports project. States that while further investigation on the potential to impact Southern Maritime Chaparral habitat and any endangered plant species caused by proposed modifications to stormwater outfall pipes is reasonable, the overall rebuild would improve wildlife habitat. States that while the EIR should assess temporary noise impacts during construction, the existing plan does this robustly. States that the previously proposed stairs and ramp at the southern tip of the campus was resolved, and a benefit of removing this proposed entry is enhanced campus security. 	<ul style="list-style-type: none"> Chapter 5.1, <i>Biological Resources</i> Chapter 5.2, <i>Noise</i>
Michelle McGraw	3/15/21	<ul style="list-style-type: none"> Biological Resources Noise Transportation 	<ul style="list-style-type: none"> Commenter supports project. States that while further investigation on the potential to impact Southern Maritime Chaparral habitat and any endangered plant species caused by proposed modifications to stormwater outfall pipes is reasonable, the overall rebuild would improve wildlife habitat. States that while the EIR should assess temporary noise impacts during construction, the existing plan 	<ul style="list-style-type: none"> Chapter 5.1, <i>Biological Resources</i> Chapter 5.2, <i>Noise</i>

2. Introduction

Table 2-1 NOP Comment Summary

Commenting Agency/Person	Date	Comment Topic	Comment Summary	Issue Addressed in Chapter/Section:
			<p>does this robustly.</p> <ul style="list-style-type: none"> States that the previously proposed stairs and ramp at the southern tip of the campus was resolved, and a benefit of removing this proposed entry is enhanced campus security. 	
Robert McGraw	3/15/21	<ul style="list-style-type: none"> Biological Resources Noise Transportation 	<ul style="list-style-type: none"> Commenter supports project. States that while further investigation on the potential to impact Southern Maritime Chaparral habitat and any endangered plant species caused by proposed modifications to stormwater outfall pipes is reasonable, the overall rebuild would improve wildlife habitat. States that while the EIR should assess temporary noise impacts during construction, the existing plan does this robustly. States that the previously proposed stairs and ramp at the southern tip of the campus was resolved, and a benefit of removing this proposed entry is enhanced campus security. 	<ul style="list-style-type: none"> Chapter 5.1, <i>Biological Resources</i> Chapter 5.2, <i>Noise</i>
Nicole Hurst and John Reynolds	3/24/21	<ul style="list-style-type: none"> Biological Resources Noise Transportation 	<ul style="list-style-type: none"> Commenter supports project. States that while further investigation on the potential to impact Southern Maritime Chaparral habitat and any endangered plant species caused by proposed modifications to stormwater outfall pipes is reasonable, the overall rebuild would improve wildlife habitat. States that while the EIR should assess temporary noise impacts during construction, the existing plan does this robustly. States that the previously proposed stairs and ramp at the southern tip of the campus was resolved, and a benefit of removing this proposed entry is enhanced campus security. 	<ul style="list-style-type: none"> Chapter 5.1, <i>Biological Resources</i> Chapter 5.2, <i>Noise</i>
Kimberly Hilland Belding	03/29/21	<ul style="list-style-type: none"> Emergency response and evacuation plans 	<ul style="list-style-type: none"> Asks how the changes to the site would address emergency response and evacuation plans 	<ul style="list-style-type: none"> Chapter 8, <i>Impacts Found Not to Be Significant</i>
Enid Sherman	3/29/21	<ul style="list-style-type: none"> Traffic Fire hazards and evacuation Biological Resources Construction Noise 	<ul style="list-style-type: none"> States that there is a lack of a full traffic study for the neighborhood and the school. States that there is a lack of information about fire risks and evacuation of the school when school is in session. States that there are many sensitive plants in the Torrey Pines Reserve and hopes they will not be impacted by the building moving closer to the Reserve. States that there are many animals and birds that reside in the Reserve and construction noise may impact their habitat. 	<ul style="list-style-type: none"> Chapter 8, <i>Impacts Found Not to Be Significant</i> Chapter 5.1, <i>Biological Resources</i> Chapter 5.2, <i>Noise</i>
Kelley Huggett	3/30/21	<ul style="list-style-type: none"> Traffic 	<ul style="list-style-type: none"> Assumes a traffic study will be prepared in order to 	<ul style="list-style-type: none"> Chapter 8,

2. Introduction

Table 2-1 NOP Comment Summary

Commenting Agency/Person	Date	Comment Topic	Comment Summary	Issue Addressed in Chapter/Section:
		<ul style="list-style-type: none"> • Construction Noise • Wildfire • Runoff 	<p>mitigate overall traffic impacts.</p> <ul style="list-style-type: none"> • States that construction noise should be evaluated on animals in the Reserve in addition to the sensitive receptors. • States that the fire impact on sensitive species and chaparral which is a highly flammable plant should be evaluated. • States that the impact of the increased roof area on runoff into the Reserve and ocean should be studied. 	<p><i>Impacts Found Not to Be Significant</i></p> <ul style="list-style-type: none"> • Chapter 5.1, <i>Biological Resources</i> • Chapter 5.2, <i>Noise</i>
Rosanna Alvarado-Martin	3/30/21	<ul style="list-style-type: none"> • Biological Resources • Climate Action Plan • Noise • Fire • Runoff • Lighting pollution • Traffic • Evacuation plan • Scenic vista • Recreation 	<ul style="list-style-type: none"> • States a full EIR should be prepared, not a focused EIR. • States that the project does not comply with the Torrey Pines Community Plan and the District failed to notify the Torrey Pines Community Planning Board about the rebuild during the planning process. • States that the MND failed to analyze that the project site is in the Coastal Zone. • States that the Air Quality/Greenhouse Gas Emissions Appendix mentioned sensitive receptors in Rosemead, CA, and this error makes the commenter question the validity of the Appendix. • States that the MND did not address the City's Climate Action Plan. • States that the limited construction and operation noise analysis is flawed and asks why no baseline assessment was conducted. • States that the MND states there are no fire hydrants onsite, but there is one on campus and two on Mira Montana Drive. • States that the project lacks the 100-foot defensible space required for Wildfire Prevention in a Very High Fire Hazard Severity Zone, and states that the Fire Marshal did not pre-approve the building plans. • States that the MND failed to address the Torrey Pines State Natural Reserve's animal and plant species, and that special care is required to reduce light, noise, and stormwater runoff impacts. • States that construction and additional impervious surfaces will negatively impact the environment by causing heat islands and runoff problems for the Reserve. • States that the MND does not adequately address the impact and significance of light pollution on the surrounding sensitive area. • States that the MND did not study the traffic impact on the streets surrounding Del Mar Heights School. • States that the proposed plan lacks a timed evacuation study. • States that the proposed project would block many views of the ocean and scenic vistas from the 	<ul style="list-style-type: none"> • Chapter 2, <i>Introduction</i> • Chapter 8, <i>Impacts Found Not to Be Significant</i> • Chapter 5.1, <i>Biological Resources</i> • Chapter 5.2, <i>Noise</i> • Also see the above response to the City of San Diego's comments.

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Table 2-1 NOP Comment Summary

Commenting Agency/Person	Date	Comment Topic	Comment Summary	Issue Addressed in Chapter/Section:
			sidewalk on Mira Montana Drive. <ul style="list-style-type: none"> • States that the District indicated that the project would have no negative impact to the community in terms of recreation; asks why the District spent \$993,048 to replace the Del Mar Heights baseball field to accommodate Little League Junior/Senior Baseball at Torrey Pines High School, and states that elementary school aged students do not play junior/senior baseball. 	

2.4 SCOPE OF THIS FOCUSED DEIR

The scope of the DEIR was determined based on the District’s initial study, comments received in response to the Initial Study and DEIR’s NOP, and the outcome of the court ruling. Pursuant to Sections 15126.2 and 15126.4 of the CEQA Guidelines, the DEIR should identify any potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance.

The information in Chapter 3, *Project Description*, establishes the basis for analyzing future, project-related environmental impacts.

2.4.1 Impacts Considered Less Than Significant

Based on the findings of the Initial Study/Mitigated Negative Declaration, the District determined that the following environmental impact categories were not significantly affected by or did not affect the proposed project. These categories are not discussed in detail in this focused DEIR.

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
 - Riparian habitat or other sensitive natural communities
 - Wetlands
 - Movement of native resident, migratory fish, wildlife species, migratory wildlife corridors, or native wildlife nursery sites
 - Local policies or ordinances
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials

2. Introduction

- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
 - Private airstrip or public airport
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

2.4.2 Potentially Significant Adverse Impacts

Based on the court ruling, the following impacts will be analyzed further in the focused DEIR.

- Biological Resources
 - Candidate, sensitive, or special status species
- Noise
 - Ambient noise levels
 - Groundborne vibration or groundborne noise levels

2.4.3 Unavoidable Significant Adverse Impacts

This focused DEIR determined that the project's impacts on biological resources would be less than significant and construction noise would be less than significant with mitigation.

2.5 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this focused DEIR, consistent with Section 15150 of the CEQA Guidelines, and they are available for review at the District's office and the District's website: <https://www.dmusd.org/cms/lib/CA01001898/Centricity/Domain/1269/2018%20FMP%20FINAL.pdf>.

- *Del Mar Union School District Facilities Master Plan*, prepared by Del Mar Union School District, 2018.

2.6 FINAL EIR CERTIFICATION

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

2. Introduction

comments, responses to the comments, and any changes to the focused DEIR that result from comments. The FEIR will be presented to the District for potential certification as the environmental document for the project. All persons who comment on the focused DEIR will be notified of the availability of the FEIR and the date of the public hearing before the District.

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

- Del Mar Union School District office: 11232 El Camino Real, San Diego, CA 92130
- Del Mar Union School District website: <https://www.dmusd.org/Page/8854>

2.7 MITIGATION MONITORING

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

The Mitigation Monitoring Program for the proposed project will be completed as part of the Final EIR, prior to consideration of the project by the District's Board of Trustees.

2. Introduction

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3. Project Description

3.1 PROJECT LOCATION

The approximately 10.85-acre project site encompasses the Del Mar Heights School property at 13555 Boquita Drive in the City of San Diego. The project site consists of Assessor's Parcel Number (APN) 301-0500-700, and is in Del Mar Heights, a 760-lot subdivision in the Torrey Pines community. The project site is surrounded by Boquita Drive to the north, Mira Montana Drive to the east, and open space canyonlands to the south and west of the project site. The subdivision of Del Mar Heights is in the City of San Diego approximately 0.30-mile west of Interstate 5 (I-5). It is surrounded by the City of Del Mar to the west and the City of San Diego to the north, east, and south. The project site is southeast of Canyon Crest Open Space Park, east and north of Torrey Pines State Natural Reserve, and north and east of the City of San Diego's Multi-Habitat Planning Area (MHPA). Figure 3-1, *Regional Location*, Figure 3-2, *Aerial Photograph*, and Figure 3-3, *Local Vicinity*, show the project site from its regional and local contexts.

3.2 STATEMENT OF OBJECTIVES

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

1. Modernize and renovate the campus to address issues identified in the Facilities Master Plan.
2. Provide a safe and up-to-date campus to enhance and facilitate students' learning environment.
3. Improve circulation and reduce offsite congestion by increasing onsite parking and drop-off/pick-up zones.
4. Provide the general public with updated recreational amenities, including an amphitheater, stand-alone green spaces, and a decomposed granite path.

3.3 PROJECT CHARACTERISTICS

"Project," as defined by the CEQA Guidelines, means:

... the whole of an action, which has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following: (1)...enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100–65700. (14 Cal. Code of Reg. § 15378[a])

3. Project Description

3.3.1 Description of the Project

Del Mar Union School District plans to fully redesign and reconstruct the Del Mar Heights School. The capacity will be reduced by one classroom (approximately 24 students) from the existing 22 regular classrooms to 21 regular classrooms, buildings will be limited to one story with low slope roofs, and access to the school will remain via Boquita Drive. The District plans to seek matching state funds, which will trigger the need for California Department of Education and Department of Toxic Substances Control approvals in addition to the CEQA process. The Figure 3-4, *Conceptual Site Plan*, shows the proposed improvements. Construction of the proposed project would occur over an approximately 8.4-acre area.

Facilities Master Plan and Del Mar Heights Proposed Site Plan

In March 2014, the District engaged with District board members, staff, principals, parents, community members, and an architectural firm to create the District's Facilities Master Plan (FMP). The District completed an extensive study that analyzed the state of the existing eight campuses and the future of "students' needs and world demands" and found that the current facility modernization approach is not aligned with future educational practices and experiences. Facilities were re-envisioned to provide students with safe, healthy, and technologically advanced learning environments.

The 2014 FMP documented the District's vision, mission, and guiding principles. Between 2014 and 2018 the District engaged in research, analysis, and piloting of modern learning environments, leading to an update of the FMP that was approved by the Board of Trustees in July 2018. This update brought the FMP in line with the "District Design 2022," which revitalized the District's strategic plan, including the vision, mission, and belief statements, and set the tone for future educational program development and facility improvements. As the mission statement of the FMP says, the District exists "to ignite genius and empower students to advance the world."

Based on the FMP and District Design 2022, Del Mar Heights School is planned to be fully rebuilt, a new school is planned in Pacific Highlands Ranch, and all other schools are to undergo some or all of the following upgrades:

Modernization / Renovation

- Modern Learning Studio
- Technology Infrastructure
- Innovation Center
- Exterior Innovation Center
- Multi-Use Room (MUR) Upgrades
- Front Office Improvements
- Professional Learning Center
- Portable Classrooms to Permanent
- Security
- Covered Dining

3. Project Description

- Play Improvements
- Parking Lot / Bus Drop Off
- Early Childhood Development Center

With regard to the Del Mar Heights School, the District seeks to create a facility supporting a modern educational program and stated the following in the Board-approved FMP:

This FMP proposes complete campus tear down and construction of a new 500-student campus site. Given the expansive playfield and grounds available, it is proposed to redesign the entire site to accommodate a new campus layout with focus on creation of a central indoor/outdoor hub, a new Innovation Center, Modern Learning Studios, and indoor/outdoor learning environments throughout. The new campus will include an enlarged parking lot with safer drop-off zones for both the kindergarten and main campus, a larger MUR space, and enhanced outdoor play areas.

The design parameters developed through the FMP and the community outreach process that guided the project architects for Del Mar Heights School are presented in Table 3-1, *Design Drivers*.

Table 3-1 Design Drivers

Site	Building
Reduce Vehicle Congestion	Campus Interconnection
Improve Pedestrian Safety	Flexibility/Adaptability
Maximize On-Site Vehicle Queuing	Indoor/Outdoor
Maximize Parking	Collaboration and Transparency
Respect Neighborhood Views	Natural Light and Fresh Air
Emergency Vehicle Access	Access to Views
Outdoor Learning Spaces, Outdoor Play Areas and Fields	Flexible Technology

The program developed by the project architects in close consultation with the District and through a series of public meetings is presented in Figure 3-5, *Site Plan Comparison*, and Table 3-2, *Plan Comparison by Area*. Figure 3-5 and Table 3-2 provide a comparison of the proposed plan with the existing campus. Figure 3-5 provides a comparison of how the total site area is used under both existing and proposed plans. The District developed the proposed site plan to achieve its education goals, minimize vehicular congestion, improve pedestrian safety, respect neighborhood views, and improve emergency vehicle access. Accomplishing the District’s educational and site goals resulted in modifying the green space and play areas, as shown in Table 3-2.

While the proposed plan revises the green space to gain educational space and reduce traffic hazards, the proposed plan continues to provide significant outdoor play areas and open, community-accessible space. This is shown in a comparison of the existing campus and proposed plan in Figure 3-6, *Open/Community Accessible Space*, and in Table 3-3, *Plan Comparison of Areas Open and Available to the Public*. The areas indicated in yellow in Figure 3-6 provide space for baseball, soccer, basketball, play apparatus, biking, walking, and similar activities.

3. Project Description

Table 3-2 Plan Comparison by Area

Area	Existing	Planned	Difference
Dirt Infield/Batting Areas	46,706	0	(46,706)
Playgrounds	66,775	34,546	(32,229)
Green Space	121,259	108,692	(12,567)
Steeply Sloped Landscape Areas	131,758	125,986	(5,772)
DG Paths and Gathering Areas	1,227	13,230	12,003
Hardscape Areas for Walking, Biking, Outdoor Gathering	43,325	61,484	18,159
School Garden	2,709	2,714	5
Landscape and Planters	2,663	25,761	23,098
Parking/Vehicle Circulation	27,216	52,828	25,612
School Buildings	48,426	66,823	18,397
Total Site Area	492,064	492,064	0

The proposed project would reduce the amount of continuous green space on Del Mar Heights School (121,634 square feet) from 33 percent of the usable site area (364,790 square feet) to 30 percent (108,692 square feet). This percentage of green space is greater than at five of the District's other seven campuses, which range from 22 percent to 25 percent of usable site area. Only Carmel Del Mar School (39 percent) and Ocean Air School (37 percent), which are both joint-use schools, provide more green space than the plans for Del Mar Heights School.

Table 3-3 Plan Comparison of Areas Open and Available to the Public

Area	Existing	Planned	Difference
Open/Community Accessible Area	279,292	217,952	(61,340)
Steeply Sloped Landscape Area	131,758	125,986	(5,772)
Landscape and Planters	2,663	25,761	23,612
School Garden	2,709	2,714	5
Parking/Vehicle Circulation	27,216	52,828	25,612
Total Site Area	443,638	425,241	(18,397)

The California Department of Education has site development guidelines, not regulations, that are applicable for determining site size based on enrollment when considering new school sites and for determining when a site is considered undersized and therefore eligible for special consideration for extra facility funding for multistory school buildings. These guidelines are not minimum requirements. Outdoor programs are required to address each school's individual PE, fitness, and playground program needs and provide facilities to adequately accommodate them. The proposed site plan satisfies the District's policies for physical education for this school.

3. Project Description

Student Capacity

The following sections explain the difference between various definitions of “capacity.” The District has the authority and is responsible for how it programs the use of its facilities based on its educational goals. Under the proposed project, the District would not increase capacity.

The District’s Board-approved Facilities Master Plan (FMP) lists Del Mar Heights School as having a current capacity of 529 students. This includes 13 K-3 classrooms at 22 students per class and 9 fourth- to sixth-grade classrooms at 27 students per classroom. In addition, 10 specialty classrooms that are “reserved and dedicated to specialty educational programs on each campus. Programs include Special Education, STEAM+, Speech, Occupational Therapy, After School Program, Parent / Teacher Room, etc. These rooms are not included in the overall capacity calculation” (FMP 2018, p. 80). Although special Education classrooms are not included in enrollment in the FMP, the two special education classes at the school are included in the capacity numbers in Table 3-4, *Del Mar Heights School: Existing Campus Capacity Based on District Policy*.

Table 3-4 Del Mar Heights School: Existing Campus Capacity Based on District Policy

Grade Span	Number of Rooms	Students/Room	Total Students
Kindergarten	3	22	66
1-3	10	22	220
4-6	9	27	243
General Education Capacity Subtotal			529
Special Ed	2 SDC ¹	15	30
Total			559

¹SDC = Special Day Class

Over the past 10 years, Del Mar Heights School had a maximum enrollment of 504 students and an average of 460 students.

The District's Board-approved FMP lists Del Mar Heights School as having a capacity of 529 for general education classrooms. When the two special education classrooms, with a capacity of 15 students each, are included with the general education classroom capacity, the total capacity is 559. Under the proposed plan, the general education capacity would be reduced to 507, with the total capacity reduced to 537, a reduction of 22 students, due to deleting one K-3 classroom, as shown in Table 3-5, *Del Mar Heights School: Proposed Plan Capacity Based on District Policy*.

Table 3-5 Del Mar Heights School: Proposed Plan Capacity Based on District Policy

Grade Span	Number of Rooms	Students/Room	Total Students
Kindergarten	3	22	66
1-3	9	22	198
4-6	9	27	243
General Education Capacity Subtotal			507
Special Ed	2 SDC	15	30
Total			537

3. Project Description

As explained above, the District is responsible for loading classrooms in a manner consistent with its educational programming, and the existence of alternative methods of calculating student capacity does not contradict the fact that the proposed project would not increase student capacity.

Facilities Improvements

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 and not counted in the overall capacity calculation), would remain unchanged. The square footage of buildings onsite would increase from 48,426 square feet to 66,823 square feet due to the increase in internal circulation and collaboration spaces between classrooms.

All buildings, play spaces, and fields would be located in the central portion of the site, to the south of the proposed parking area and west of the drop-off zone and staff parking area. The administration building, kindergarten classrooms and playground, and after-school classrooms would be in the northern portion; classrooms and learning spaces for grades 1 through 3 would be in the eastern portion; and classrooms and learning spaces for grades 4 through 6 would be in the southern portion of the site. Additionally, the art, science, and music studios, multiuse room (MUR), and Innovation Center (I.C.), which was formerly the library, would be to the west of the administration building. The landscape buffer along the eastern portion of the site would be preserved and improved to shield views of the school roof and buffer sound. The school facilities have been designed and located so that noise from their use would not be louder than the existing conditions ambient noise levels within the adjacent MHPA/preserve area.

Drainage Improvements

The proposed project would require improvements to outfall drainage at the southern and western portions of the property boundary because the existing stormwater outfalls are causing erosion. The improvements to the southern and western slopes would disturb approximately 610 square feet and 2,000 square feet, respectively. For both outfall drainage improvements, slopes at these existing outfalls would be improved and planted with native vegetation, including but not limited to a native hydroseed mix—*Baccharis pilularis* ‘Pigeon Point’, *Arctostaphylos*, *Encelia farinosa*, *Malosma laurina*, *Penstemon centranthifolius*, *Rhus integrifolia*, *Rhus ovata*, *Sabia leucophylla*, and *Zauschneria californica*—to improve slope stability. The slopes at the outfall locations would be backfilled and restored to their original grade.

Additionally, these outfalls would also be improved with concrete energy dissipators and rip-rap to avoid future erosion by reducing flow velocities of stormwater, per the City’s requirements, and jute-netting or straw blankets would be used on the reconstructed slopes to add stability. Surface runoff from the project site that has been treated by bioswales, in compliance with State permit regulations, will flow into these outfall drainages to avoid untreated stormwater from draining into the MHPA; the stormwater system design would not result in a net increase of flows. The outfalls would include new piping that would replace the existing stormwater pipes, which have deteriorated and are contributing to the existing erosion. The proposed improvements would be irrigated by above-grade brown UV-resistant PVC pipe and rotors that would provide the water needed for these native plant species to properly establish; the temporary irrigation would be disconnected from the school’s irrigation when the native plant species have been established.

3. Project Description

Access and Circulation

To reduce circulation and congestion issues, as well as the number of cars parked within the neighborhood, the District is proposing to increase onsite parking and lengthen the passenger loading and vehicle queuing zone, to ensure impacts to the neighborhood north of the project site are reduced.

The parking lot onsite would be expanded to include a total of 80 staff, visitor, and kindergarten parking spaces, which would result in a net increase of 32 stalls compared to existing conditions. The proposed eastern parking lot would be within 10 feet to 25 feet below the elevation of Mira Montana Drive, which would limit noise and views of the parking lot from Mira Montana Drive residences.

At the center of the eastern parking lot, at the southeastern portion of the site, a drop-off/pick-up zone and turnaround would be created to allow vehicles to exit from the existing driveway on Boquita Drive. Moreover, the passenger loading and vehicle queuing zone would be extended from the entrance of the driveway to the southeastern portion of the site. The extended queuing zone would accommodate approximately 41 cars, which is a net increase of approximately 26 cars from existing conditions and would be adjacent to the kindergarten and first- through third-grade classrooms. Special-education van queuing would be to the south of the drop-off/pick-up zone, before the turnaround. By increasing efficiency and flow for vehicles to enter and exit the school property, congestion on adjacent streets would be reduced, creating a safer environment for students who live in the neighborhood to walk and/or bike to campus, consistent with District Board Policy 5142.2, Safe Routes to School. Figure 3-7, *Student Access Plan*, provides more detail about the access plan and identifies where drop-offs/pick-ups would occur by grade level and special education.

The original plan included construction of an ADA-compliant ramp and stairs from the Mira Montana Drive cul-de-sac down to the southeastern end of the campus. Due to concerns that improved student access from Mira Montana Drive would increase traffic along that road, the District Board removed the ADA ramp and stairs from the project.

To provide needed security for students and staff during the school day, the District's plan includes fencing and gates (see Figure 3-8, *Fencing Plan*). The campus is currently fenced, and public access to the site is prohibited during school hours.

Figure 3-9, *Fire Access Lane*, shows circulation for emergency vehicle access around the campus.

Physical Education and Recreational Amenities

The multiuse field would be reconfigured and would remain in the western portion of the site. Following the educational specifications adopted for the school, the site plan increases the area provided for learning spaces and consequently reduces the amount of space remaining for outdoor recreation. Though the two ballfields used by the older baseball teams (90-foot infields) and the batting cages would be eliminated, the new flat grass field has space for two smaller fields used by younger baseball teams. The field is also available for soccer play.

The commons, playground, and play equipment would be in the central portion of the campus and north of the multiuse field. A garden would be at the southeastern corner of the multiuse field.

3. Project Description

The proposed project would provide amenities that are not now available, including an open grass amphitheater area for larger group gatherings and a Canyon Rim path and sidewalk that would create a walking loop around the site.

The existing kindergarten area, at the northwest corner of the site, would be converted to an outdoor learning area, which would provide green space and a viewpoint. The outdoor learning area would be designed for educational programs for the students. It would not include lighting. Along the western boundary of the school, a canyon rim field access area and canyon rim nature path would provide views of the open space areas to the west of the project site.

Lighting

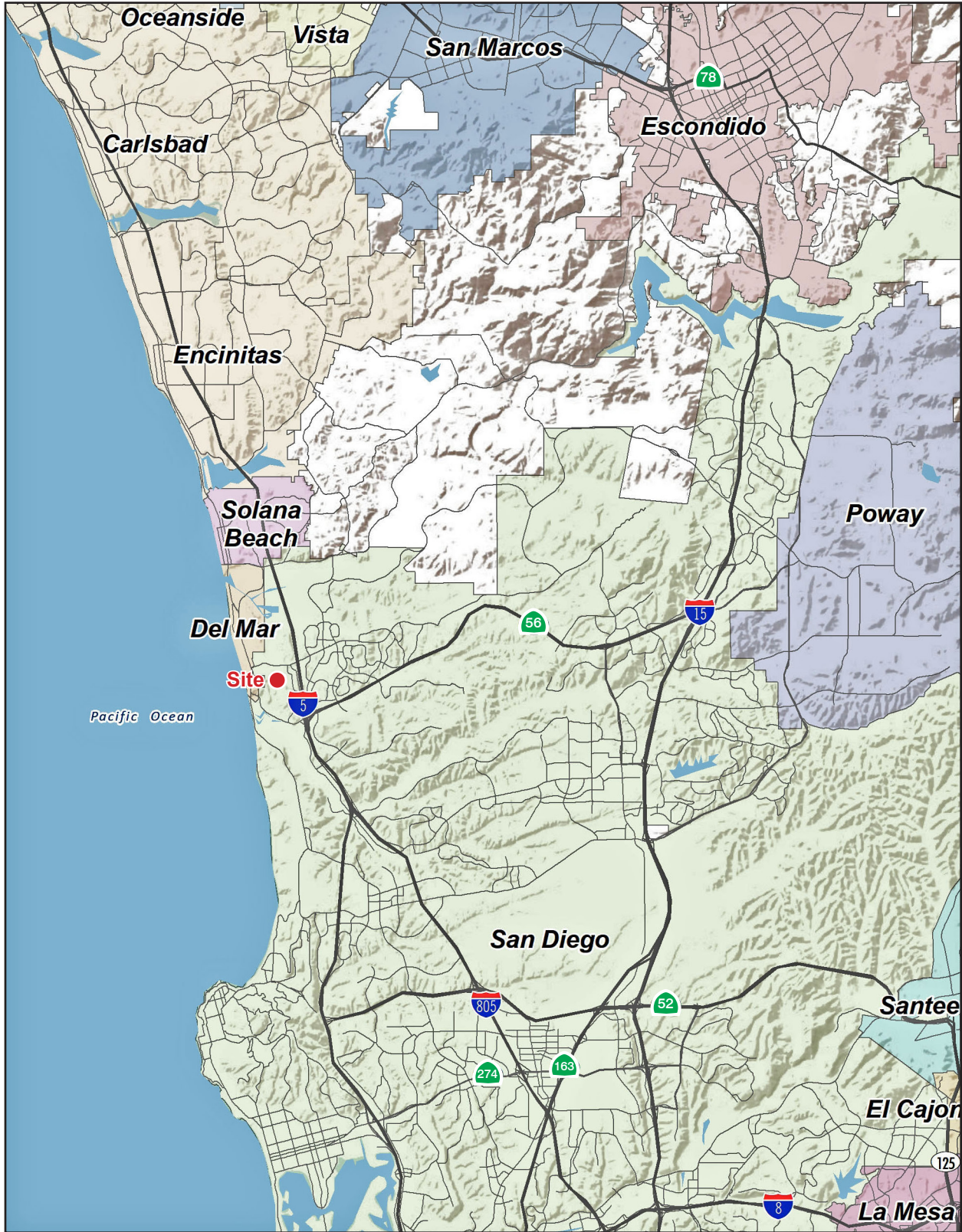
No lighting is proposed for the field, which is adjacent to the MHPA. The school walkways and parking areas would have motion-detected lighting for security and safety purposes. The lighting poles in the northern parking lot would have twin head fixtures on 22-foot-high poles; lighting poles in the eastern parking lot would be 12 feet high to minimize any protrusion of light above the slope on the eastern side; and the lighting poles in the center of the campus and along the western side would be 10 feet high. Evening events would end by 9:00 pm. The longest period of lighting would be from approximately 5:00 pm to 9:00 pm during winter months.

3.4 INTENDED USES OF THE EIR

This Draft EIR is a project DEIR that examines the environmental impacts of the proposed project. This DEIR also addresses various actions by the District and others to adopt and implement the proposed project. It is the intent of this DEIR to evaluate the environmental impacts of the proposed project, thereby enabling the District, other responsible agencies, and interested parties to make informed decisions with respect to the requested entitlements. The anticipated approvals required for this project are:

Lead Agency	Action
Del Mar Union School District Board of Trustees	Approval of Project Certification of EIR
Responsible Agencies	Action
California Division of the State Architect	Approval of Building Plans
City of San Diego (PTS # 666025)	Approval of Bus Staging Area Approval of Development within the Coastal Overlay Zone Issuance of Coastal Development Permit
City of San Diego Fire Department	Inspection of Brush Management Approval of Site Plan

Figure 3-1 - Regional Location
3. Project Description



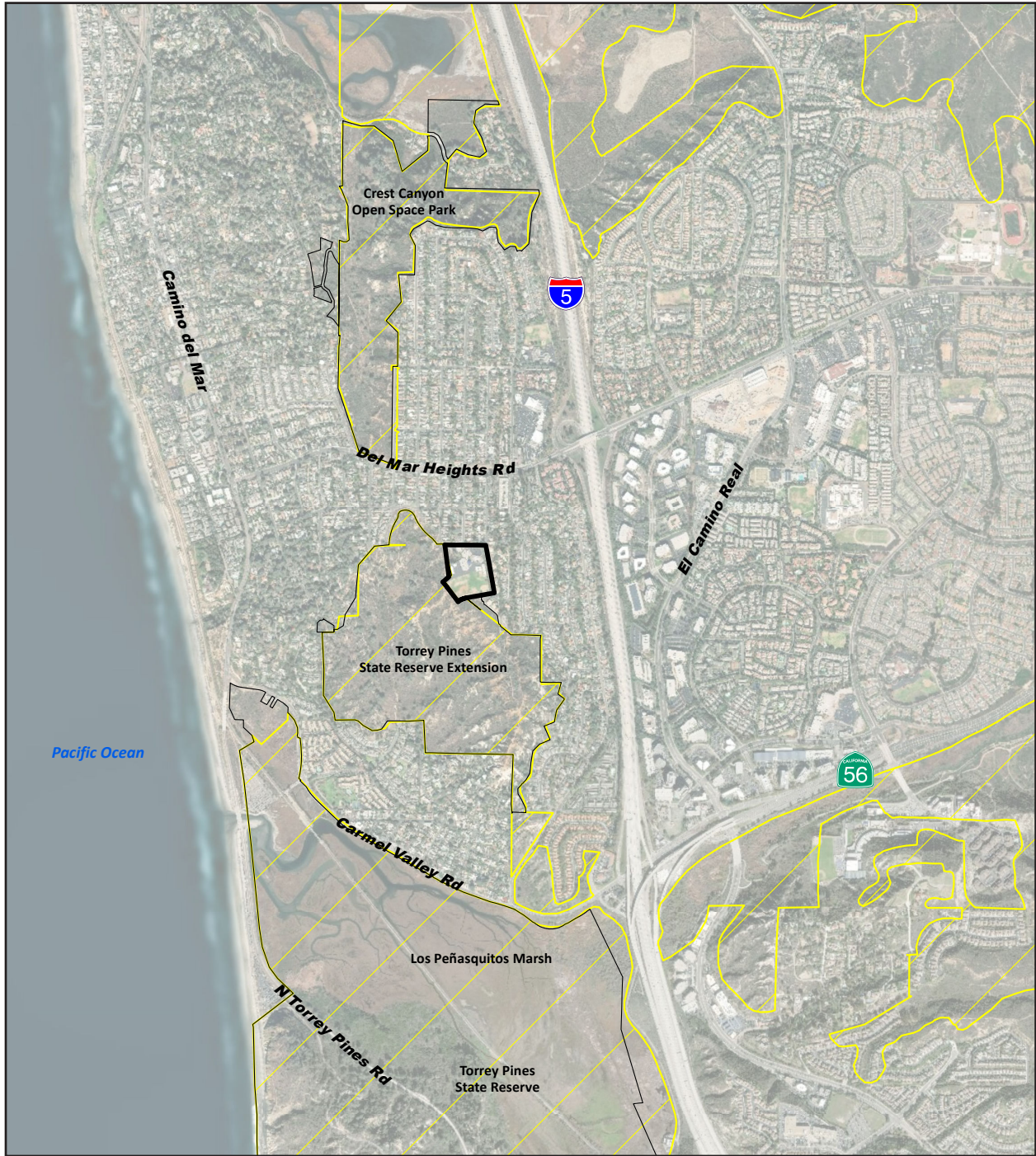
Note: Unincorporated county areas are shown in white.
Source: ESRI, 2019





3. Project Description

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Figure 3-2 - Aerial Photograph
3. Project Description



-  Project Boundary
-  City of San Diego Multi-Habitat Planning Area (MHPA)

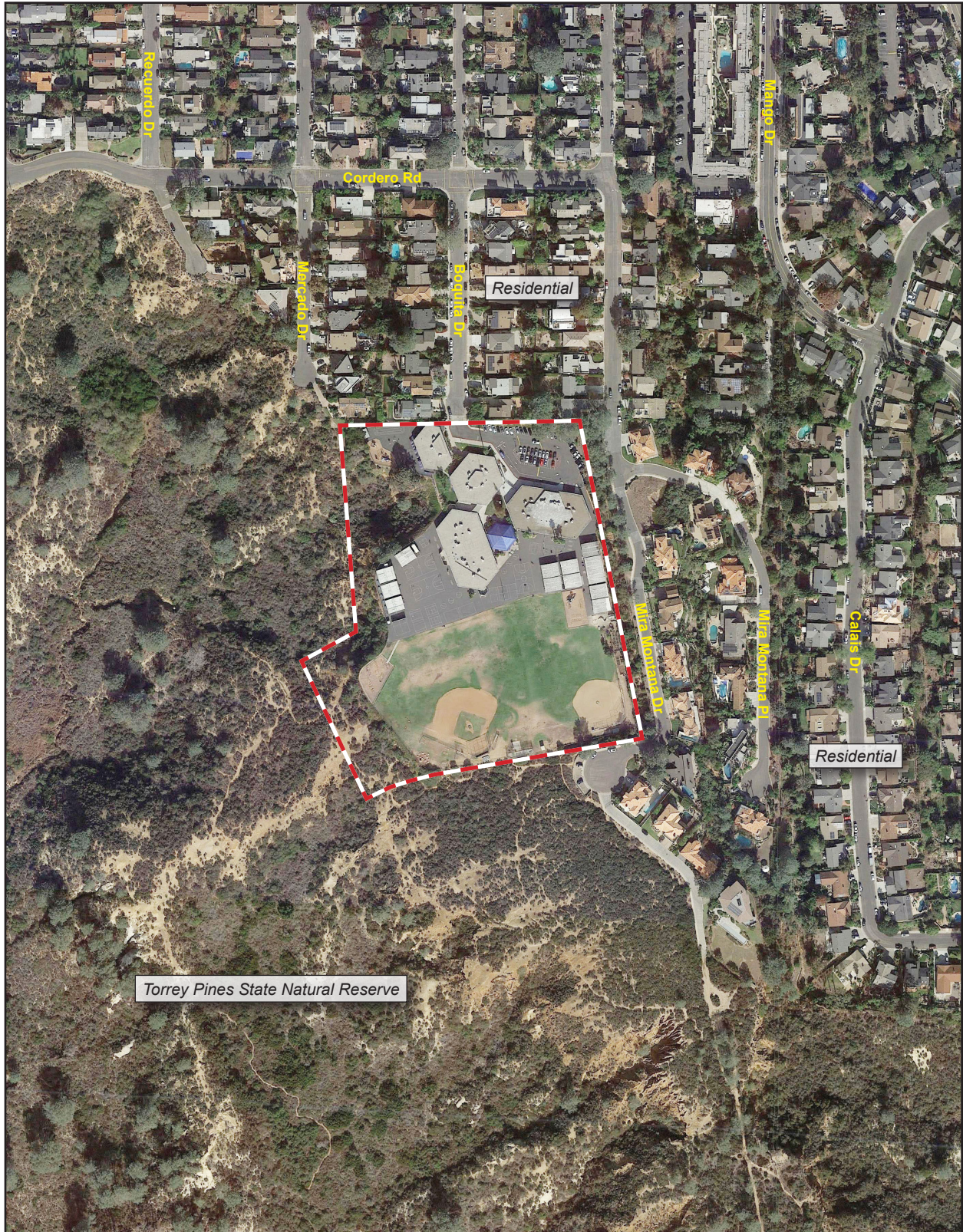
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Scale (Feet)



3. Project Description

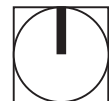
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Figure 3-3 - Local Vicinity
3. Project Description



--- Project Boundary

0 350
Scale (Feet)



Source: Google Earth Pro, 2019

3. Project Description

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Figure 3-4 - Conceptual Site Plan
 3. Project Description



--- Project Boundary

Note: ✖ Stairs and ADA ramp eliminated from project.

Source: Baker Nowicki Design Studio, 2020

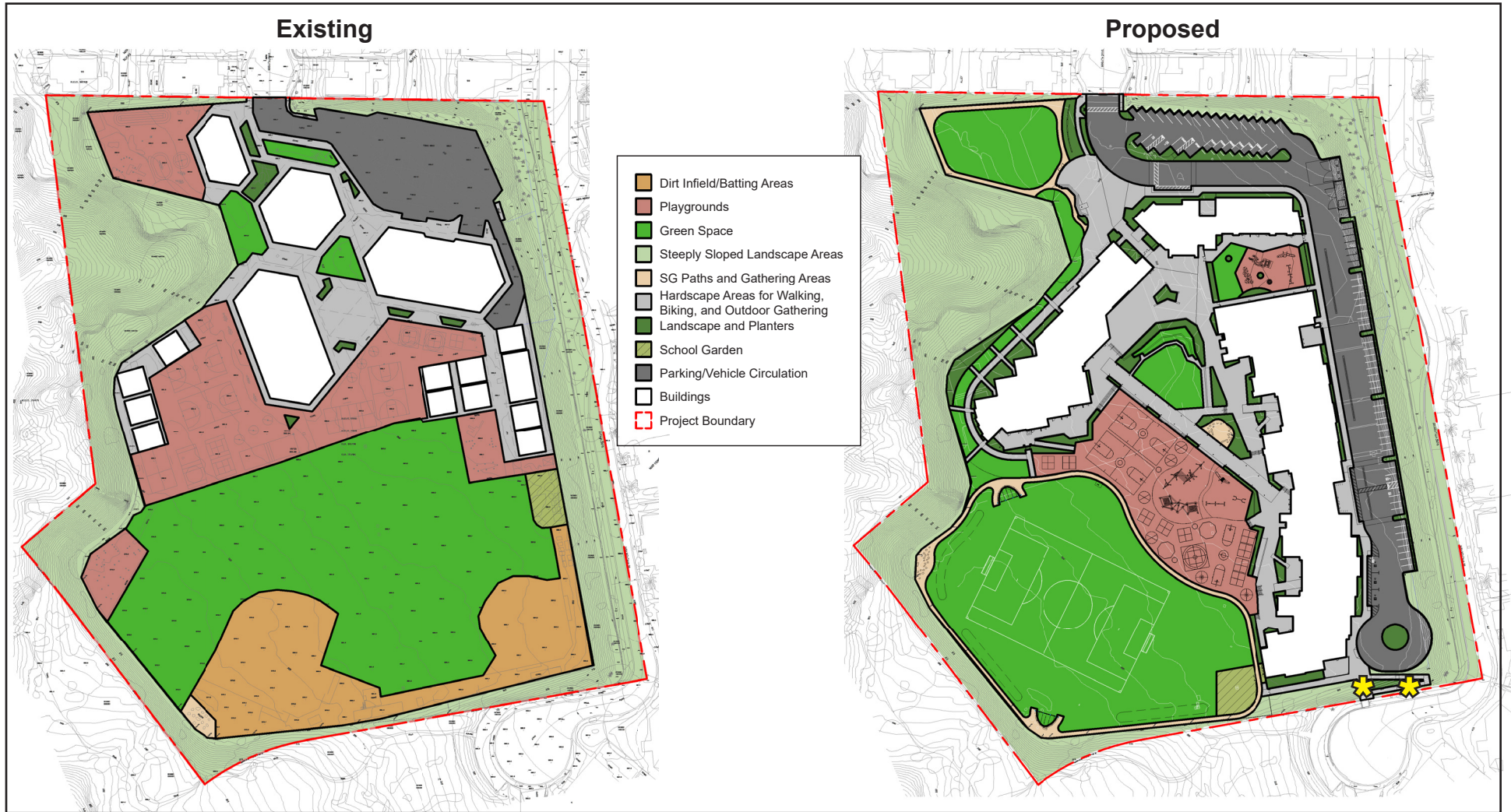
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 Scale (Feet)



3. Project Description

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Figure 3-5 - Site Plan Comparison
 3. Project Description



--- Project Boundary

Note: ✖ Stairs and ADA ramp eliminated from project.

Source: Baker Nowicki Design Studio, 2020

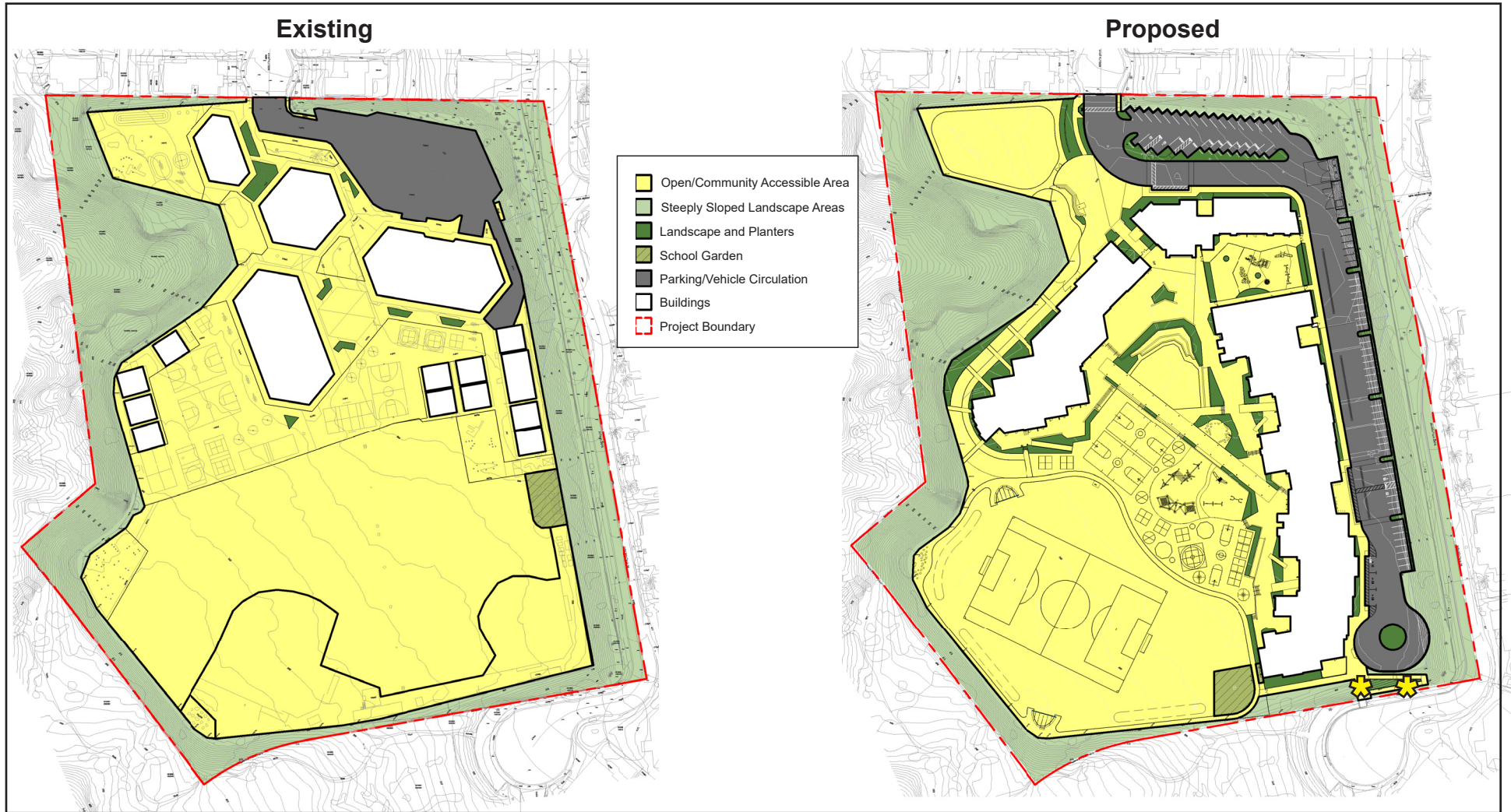
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3. Project Description

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Figure 3-6 - Open/Community Accessible Space
3. Project Description



--- Project Boundary

Note: * Stairs and ADA ramp eliminated from project.

Source: Baker Nowicki Design Studio, 2020

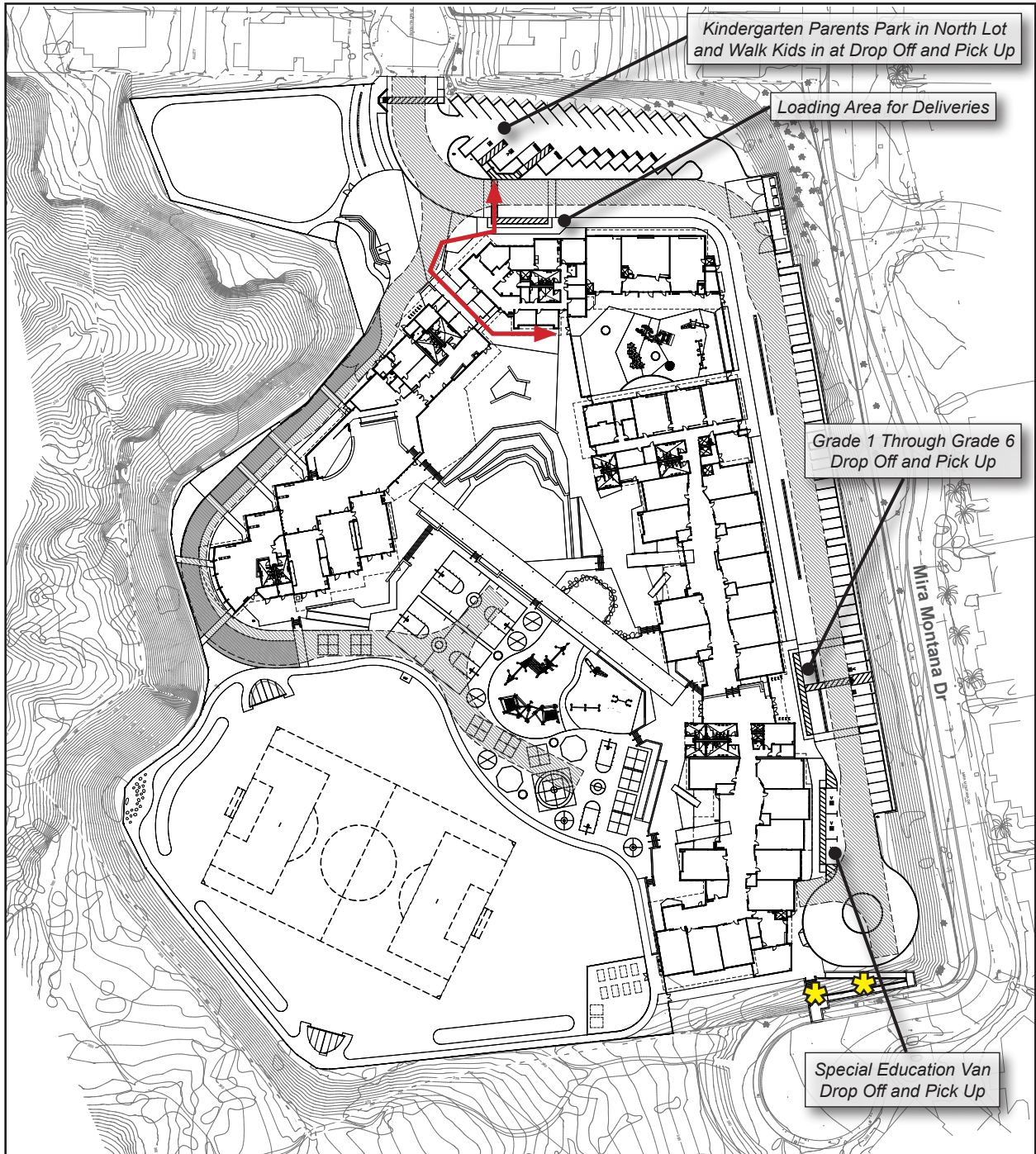
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3. Project Description

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Figure 3-7 - Student Access Plan
3. Project Description



↔ Path of Travel

Note: ✨ Stairs and ADA ramp eliminated from project.

Source: Baker Nowicki Design Studio, 2020

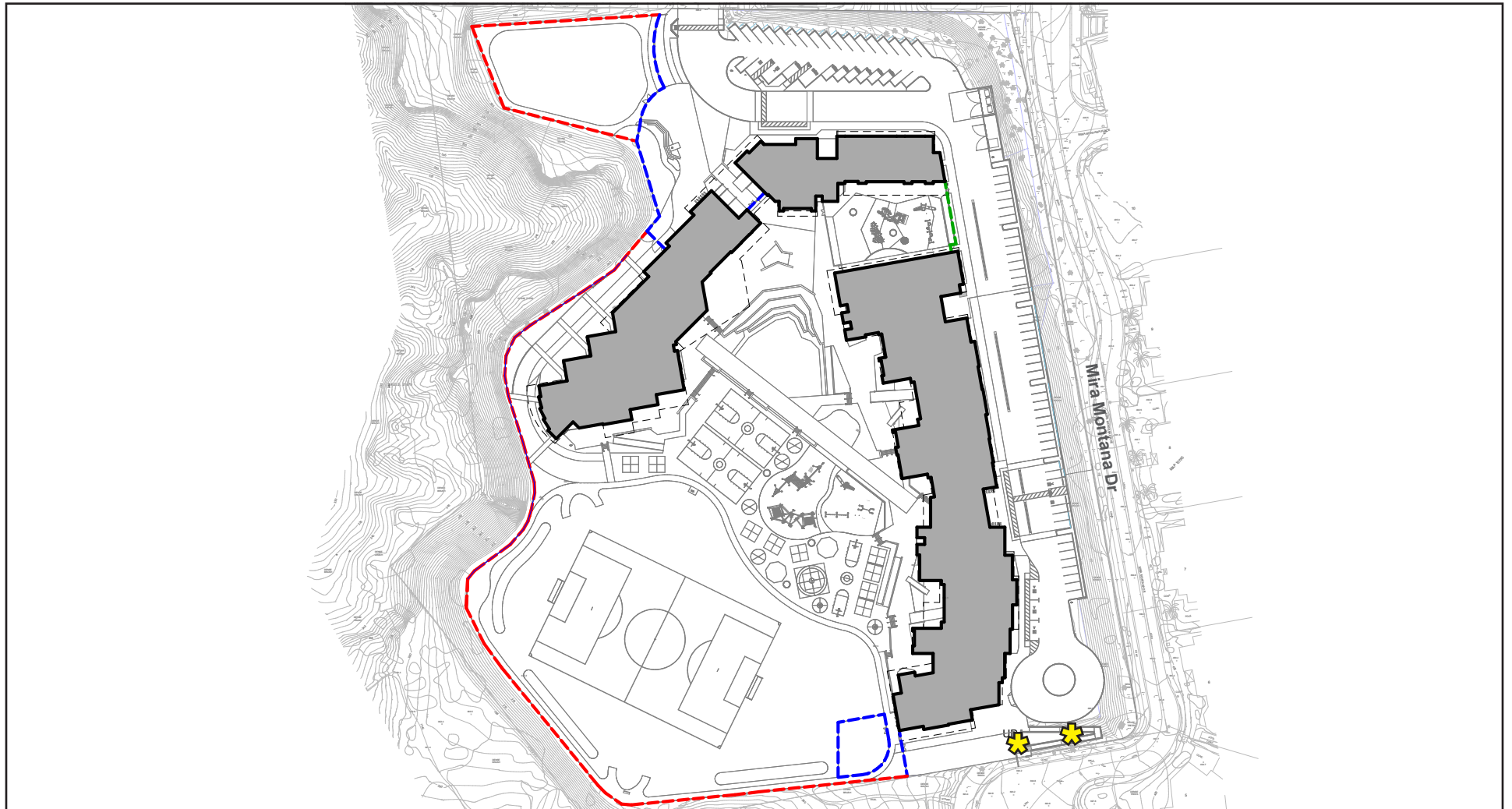
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Scale (Feet)



3. Project Description

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Figure 3-8 - Fencing Plan
3. Project Description



— 8-ft High Black Chain Link Fence with Snake Protection

— 12-ft High Wall

Note: * Stairs and ADA ramp eliminated from project.

— 8-ft High Black Ornamental Steel Fence

■ Building Footprint

0 150
Scale (Feet)

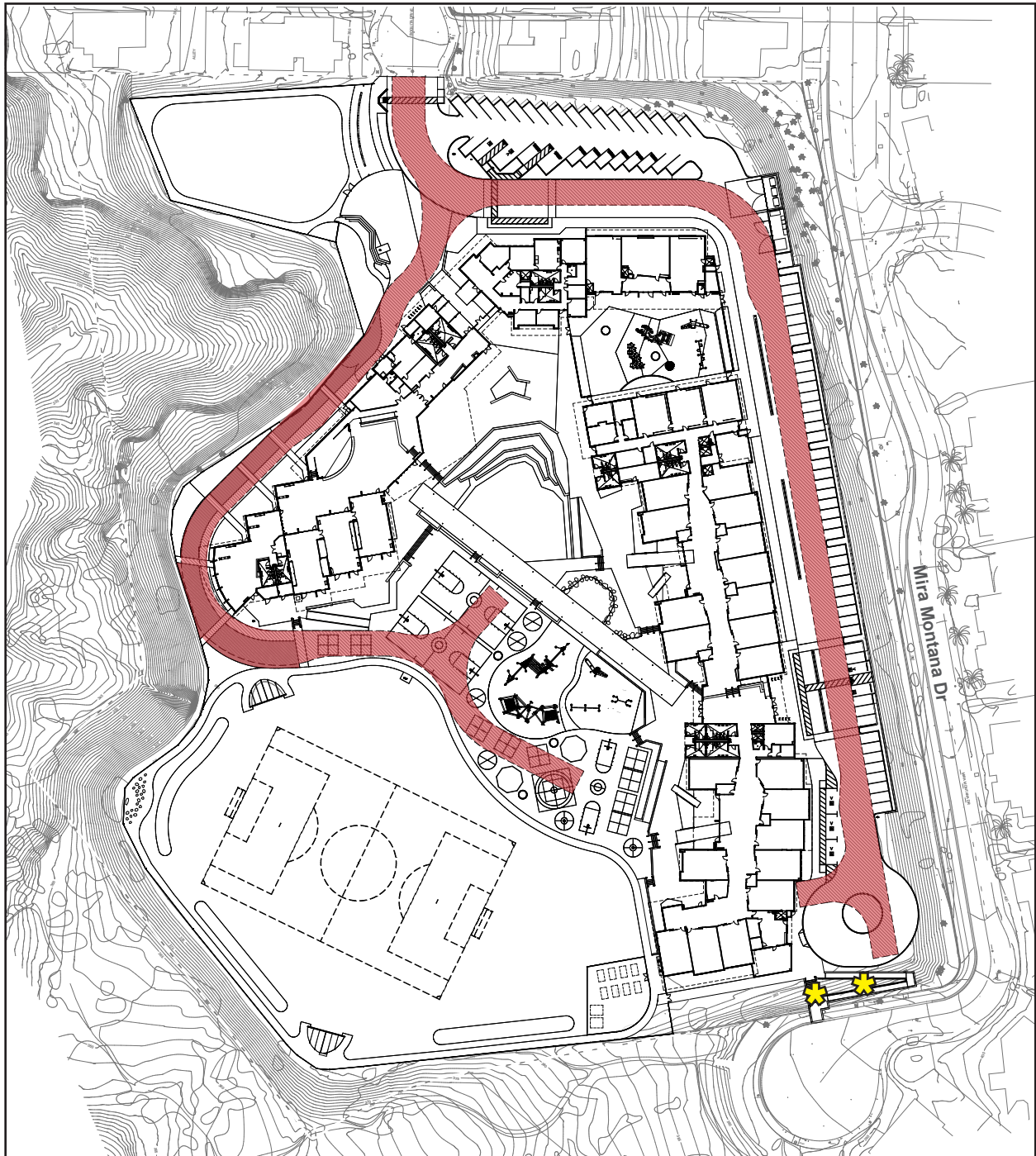


Source: Baker Nowicki Design Studio, 2020


3. Project Description

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Figure 3-9 - Fire Access Lane
3. Project Description



 Fire Access Lane

Note:  Stairs and ADA ramp eliminated from project.

Source: Baker Nowicki Design Studio, 2020

0 125
Scale (Feet)



3. Project Description

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4. Environmental Setting

4.1 INTRODUCTION

This section provides a “description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, ... from both a local and a regional perspective” (CEQA Guidelines § 15125[a]), pursuant to provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines. The environmental setting provides the baseline physical conditions from which the lead agency will determine the significance of environmental impacts resulting from the proposed project.

4.2 REGIONAL ENVIRONMENTAL SETTING

The City of San Diego is in the western portion of San Diego County and is bordered by the cities of National City to the south; Lemon Grove, La Mesa, El Cajon, Santee, Poway, unincorporated San Diego County to the east; Escondido, unincorporated San Diego County, Del Mar, and Solana Beach to the north; and the Pacific Ocean to the west (see Figure 3-1, *Regional Location*, in Chapter 3, *Project Description*). The project site is approximately 0.34 mile west of Interstate 5 (I-5), which runs north-south; local access is provided via Boquita Drive.

4.3 LOCAL ENVIRONMENTAL SETTING

The approximately 10.85-acre project site encompasses the Del Mar Heights School property at 13555 Boquita Drive in the City of San Diego. The project site consists of Assessor’s Parcel Number (APN) 301-0500-700 and is in Del Mar Heights, a 760-lot subdivision in the Torrey Pines community. The project site is surrounded by Boquita Drive to the north, Mira Montana Drive to the east, and open space canyonlands to the south and west of the project site. The subdivision of Del Mar Heights is surrounded by Del Mar to the west and San Diego to the north, east, and south, and is approximately 0.30 mile west of Interstate 5 (I-5). The project site is southeast of Canyon Crest Open Space Park, east and north of Torrey Pines State Natural Reserve, and San Diego’s Multi-Habitat Planning Area (MHPA) is to the west and south of the site. Figure 3-1, *Regional Location*, Figure 3-2, *Aerial Photograph*, and Figure 3-3, *Local Vicinity*, show the project site from its regional and local contexts. Moreover, the project site is within the City of San Diego Coastal Overlay Zone and the State of California Coastal Zone. Figures 4-1a, 4-1b, and 4-1c, *Site Photographs*, show the existing conditions of the site.

4.3.1 Facilities and Drainage

The project site currently operates as a K-6 school and includes an administration building, 22 classrooms, and 13 specialty classrooms (permanent and portables); the total square footage of the buildings onsite is 48,426 square feet. These structures are in the northern and eastern portions of the site. The northwest

4. Environmental Setting

portion of the site includes play structures; a surface parking lot with 48 spaces is at the northeast portion of the site; and hardcourts and play structures are in the central portion of the site, north of the playing field. The eastern portion of the site includes a vegetable garden and play structures. A multiuse field is situated in the southern portion of the site. Figures 4-1a through 4-1c, *Site Photographs*, show photos of the project site. According to the 2018 Facilities Master Plan, the portable classrooms, plumbing, roofing, and HVAC systems need replacement, and the site requires regrading. The classrooms include underutilized internal access, and the Multi-Use Room (MUR) is disassociated from the campus. Modernization of the school facilities, including the play structures/fields, and redesign and reconstruction of the campus facilities are required to improve student safety and flow within the campus.

Two existing stormwater outfall drainages have failed; the existing stormwater outfall pipes at these locations show significant signs of deterioration and are causing erosion along the southern and western limits of the school. Stormwater is directed to these outfall locations by surface flow and underground pipes. Due to the failed drainages, deep erosional gullies have formed. The erosion is also contributing to loss of vegetation within the eroded areas.

4.3.2 Access and Parking

The ingress and egress to the campus is through the school's driveway on Boquita Drive, which leads to the school's parking lot. Vehicular access is via a two-way driveway. The parking lot contains 48 stalls and an approximately 317-foot passenger loading area, which can accommodate approximately 15 cars, adjacent to the administration building. The District's 2018 Facilities Master Plan recognizes the hazard presented along Boquita Drive and the adjoining neighborhood due to the limited drop-off/pick-up zones and insufficient onsite parking (DMUSD 2018).

The school's principal (Jason Soileau, 2020) has observed the following hazardous conditions:

- Due to insufficient on-site parking, staff and parents are forced to park along Boquita Drive, which further narrows a two-lane neighborhood street.
- The long traffic queue backs up to the four-way stop at the Boquita Drive/Cordero Road intersection, and despite placement of a crossing guard, pedestrian crossing is difficult.
- The afternoon queue of cars waiting for student pick-up causes other drivers to drive on the wrong side of the road to access the parking lot.
- Emergency vehicle access is also constricted by the afternoon queue due to parked cars.
- Mostly during afternoon pick-up, some parents park on Cordero Road and then walk on the east side of Boquita Drive instead of using the crosswalk on Cordero Road; parents cross Boquita Drive into the school, which stops traffic in both directions.
- Riding bikes to school is challenging due to the cars parked on both sides of the road, queuing in both lanes, and the narrow sidewalks do not provide enough space for safe riding.

Figure 4-1a - Site Photographs
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View of the project site from Durango Drive looking east.



View of the existing parking lot looking east near the project driveway at Boquita Drive.

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Figure 4-1b - Site Photographs
4. Environmental Setting



View of the project site looking southeast near the project driveway at Boquita Drive.



View of the playground at the northwest corner of the project site.

4. Environmental Setting

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Figure 4-1c - Site Photographs
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View from the play field looking north toward the school buildings.



View from Mira Montana Drive looking west toward the project site.

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4. Environmental Setting

- Parked cars of both sides of the street limit the ability of mail and trash trucks to access residences, which further congests the street.
- During the afternoon pick-up, some parents abandon their cars in the travel lane to retrieve their child.
- Some parents complete an illegal and hazardous U-turn on Boquita Drive to avoid the time required to flow through the on-site loop.
- The congestion on Boquita Drive causes a large number of parents to direct their children to walk to the canyon via Mira Montana Drive, which creates safety concerns.
- Some parents arrive early in the afternoons and park on Boquita Drive, which results in blocking driveways.

Operations

Del Mar Heights School is one of eight schools operated by the District. Del Mar Heights School offers kindergarten and grades 1 through 6.

Del Mar Heights School follows the District’s attendance calendar. All grades at the school start at 8:00 am and are dismissed at 2:30 pm on Mondays, Tuesdays, Thursdays, and Fridays; on Wednesdays, which follows a minimum-day schedule, students are dismissed at 12:30 pm.

The 2019-2020 school year enrolled 459 students. During the 2018-2019 school year, Del Mar Heights School enrolled 495 students in kindergarten through sixth grade. Within the past 10 years, Del Mar Heights School’s highest enrollment of 504 students was during the 2017-2018 school year, and over the last 10 school years, the school had an average enrollment of 460 students. Table 4-1, *Del Mar Heights School 10-Year Enrollment History*, shows the 10-year enrollment history for Del Mar Heights School (see Chapter 3, *Project Description*, for further discussion on capacity).

Table 4-1 Del Mar Heights School 10-Year Enrollment History

School Year	Enrollment
2018-2019	495
2017-2018	504
2016-2017	479
2015-2016	459
2014-2015	443
2013-2014	458
2012-2013	444
2011-2012	442
2010-2011	431
2009-2010	445
10-Year Average Enrollment:	460

Source: CDE 2019.

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The District owns the site and allows community use of the multiuse field for activities such as baseball and soccer.

4.3.3 Surrounding Land Use

The project site is in a residential community with low-density, single-family residences, and is approximately 0.80 mile east of the Pacific Ocean. The site is surrounded by the land uses described below.

- **North:** Boquita Drive and single-family residences.
- **East:** Mira Montana Drive and single-family residences.
- **South:** Mira Montana Drive, single-family residences, and open space canyonlands in the Torrey Pines State Natural Reserve, which is dedicated to preserving Torrey pines and indigenous wildlife.
- **West:** Open space canyonlands in the Torrey Pines State Natural Reserve Extension.

4.3.4 EXISTING ZONING AND GENERAL PLAN

The City of San Diego General Plan land use designation for the project site is Institutional and Public and Semi-Public Facilities (San Diego 2018). The project site is zoned RS-1-3 (San Diego 2019). Under the RS-1-3 zone, a conditional use permit is required for educational facilities, according to San Diego Municipal Code Section 131.0422, Use Regulations Table for Residential Zones. However, on July 22, 2020, Del Mar Union School District Board of Trustees approved an exemption from local residential zoning requirements under Government Code Section 53094.

To the east and southeast of the project site, properties are zoned RS-1-3; to the north of the project site, properties are zoned RS-1-6; and the Torrey Pines State Natural Reserve, to the south and west of the project site, is zoned OP-1-1 (San Diego 2019). The General Plan Land Use Designation of the surrounding area is Residential, with the exception of the Torrey Pines State Natural Reserve, which is designated Park, Open Space, and Recreation.

4.4 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS

Cumulative impacts are defined as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts” (14 C.C.R. § 15130[b]). Cumulative impacts are the change caused by the incremental impact of the project evaluated in the EIR together with the incremental impacts from closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

Section 15130 of the CEQA Guidelines states that cumulative impacts shall be discussed when the project’s incremental effect is cumulatively considerable. It further states that this discussion shall reflect the level and severity of the impact and likelihood of occurrence, but not in as much detail as the project.

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The information used in an analysis of cumulative impacts comes from one of two sources:

- A. A list of past, present, and probable future projects producing related cumulative impacts, including, if necessary, projects outside of the control of the agency.
- B. A summary of projects in an adopted general plan or related planning document, or in a prior environmental document that has been adopted or certified, that described or evaluated regional or area-wide conditions contributing to the cumulative impact.

The cumulative impact analyses in this EIR use a combination of sources A and B. Depending on the environmental category, the cumulative impact analysis may use either source. Some impacts are site specific, such as cultural resources, and others may have impacts outside the District boundaries, such as regional air quality.

4.5 REFERENCES

California Department of Education (CDE). 2019. Data Quest. <https://dq.cde.ca.gov/dataquest/>

Del Mar Union School District (DMUSD). 2018. Facilities Management Plan (FMP).
<https://www.dmusd.org/cms/lib/CA01001898/Centricity/Domain/1269/2018%20FMP%20FINAL.pdf>

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4. Environmental Setting

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5. Environmental Analysis

Chapter 5 examines the environmental setting of the proposed project, analyzes its effects and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts. This chapter has a separate section for each environmental issue area that was determined to need further study in the EIR. This scope was determined in the Initial Study and response to comments (see Appendix 1-1 and Appendix 1-2); the DEIR's notice of preparation (NOP); public and agency comments received during the NOP comment period from March 1, 2021, to March 30, 2021 (see Appendix 2-1); and the court ruling. Environmental issues and their corresponding sections are:

- 5.1 Biological Resources
- 5.2 Noise

Sections 5.1 and 5.2 provide a detailed discussion of the environmental setting, impacts associated with the proposed project, and mitigation measures designed to reduce significant impacts where required and when feasible. The residual impacts following the implementation of any mitigation measures are also discussed.

The Initial Study also determined that certain issues under an environmental topic would not be significantly affected by implementation of the project; these issues are not discussed further in this focused EIR (see Chapter 8, *Impacts Found Not to Be Significant*).

Organization of Environmental Analysis

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

- Environmental Setting
- Thresholds of Significance
- Plans, Programs, and Policies
- Environmental Impacts
- Cumulative Impacts
- Level of Significance Before Mitigation
- Mitigation Measures
- Level of Significance After Mitigation
- References

In addition, Chapter 1, *Executive Summary*, has a table that summarizes all impacts by environmental issue.

5. Environmental Analysis

Terminology Used in This Draft EIR

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

- **No impact.** The project would not change the environment.
- **Less than significant.** The project would not cause any substantial, adverse change in the environment.
- **Less than significant with mitigation incorporated.** The EIR includes mitigation measures that avoid substantial adverse impacts on the environment.
- **Significant and unavoidable.** The project would cause a substantial adverse effect on the environment, and no feasible mitigation measures are available to reduce the impact to a less than significant level.

5. Environmental Analysis

5.1 BIOLOGICAL RESOURCES

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

- *Biological Technical Report for the Del Mar Heights Elementary School Rebuild Project*, Alden Environmental, Inc., April 27, 2021

A complete copy of this study is included as Appendix 5.1-1 to this DEIR.

5.1.1 Environmental Setting

5.1.1.1 REGULATORY BACKGROUND

Federal

Endangered Species Act

The Federal Endangered Species Act (FESA) of 1973, as amended, protects and conserves any species of plant or animal that is endangered or threatened with extinction, as well as the habitats where these species are found. “Take” of endangered species is prohibited under Section 9 of the FESA. “Take” means to “harass, harm, pursue, hunt, wound, kill, trap, capture, collect, or attempt to engage in any such conduct.” Section 7 of the FESA requires federal agencies to consult with the U.S. Fish and Wildlife Service (USFWS) on proposed federal actions that may affect any endangered, threatened, or proposed (for listing) species or critical habitat that may support the species. Section 4(a) of the FESA requires that critical habitat be designated by the USFWS “to the maximum extent prudent and determinable, at the time a species is determined to be endangered or threatened.” This provides guidance for planners/managers and biologists by indicating locations of suitable habitat and where preservation of a particular species has high priority. Section 10 of the FESA provides the regulatory mechanism for incidental take of a listed species by private interests and nonfederal government agencies during lawful activities. Habitat conservation plans (HCPs) for the impacted species must be developed in support of incidental take permits to minimize impacts to the species and formulate viable mitigation measures.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) (US Code, Title 16, §§ 703–712) governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. It prohibits the take, possession, import, export, transport, sale, purchase, barter, or offering of these activities, except under a valid permit or as permitted in the implementing regulations. USFWS administers permits to take migratory birds in accordance with the MBTA. In December 2017, the Department of the Interior issued a memorandum concluding that “consistent with the text, history, and purpose of the MBTA, [the statute’s prohibitions on take apply] only to affirmative actions that have as their purpose the taking or killing of migratory birds, their nests, or their eggs” (emphasis added) (DOI 2017). Therefore, take of a migratory bird or its active nest (i.e., with eggs or young) that is incidental to, and not the purpose of, a lawful activity does not violate the MBTA. To provide guidance in implementing and enforcing this new direction, the USFWS

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issued a memorandum in April 2018 to clarify what does and does not constitute prohibited take (USFWS 2018).

State

Clean Water Act, Section 404

The United States Army Corps of Engineers (Corps) regulates discharge of dredged or fill material into “waters of the United States.”¹ Any filling or dredging within waters of the United States requires a permit, which entails assessment of potential adverse impacts to Corps wetlands and jurisdictional waters and any mitigation measures that the Corps requires. Section 7 consultation with USFWS may be required for impacts to a federally listed species. If cultural resources may be present, Section 106 review may also be required. When a Section 404 permit is required, a Section 401 Water Quality Certification is also required from the Regional Water Quality Control Board (RWQCB).

Clean Water Act, Section 401 and 402

Section 401(a)(1) of the CWA specifies that any applicant for a federal license or permit to conduct any activity that may result in any discharge into navigable waters shall provide the federal permitting agency with a certification, issued by the state in which the discharge originates, that any such discharge will comply with the applicable provisions of the CWA. In California, the applicable RWQCB must certify that the project will comply with water quality standards. Permits requiring Section 401 certification include Corps Section 404 permits and National Pollutant Discharge Elimination System (NPDES) permits issued by the US Environmental Protection Agency (EPA) under Section 402 of the CWA. NPDES permits are issued by the applicable RWQCB. The City of San Diego is in the jurisdiction of the San Diego RWQCB (Region 9).

California Fish and Game Code, Section 1600

Section 1600 of the California Fish and Game Code requires a project proponent to notify the California Department of Fish and Wildlife (CDFW) of any proposed alteration of streambeds, rivers, and lakes. The intent is to protect habitats that are important to fish and wildlife. CDFW may review and place conditions on the project as part of a Streambed Alteration Agreement that address potentially significant adverse impacts within CDFW’s jurisdictional limits.

California Endangered Species Act

The California Endangered Species Act (CESA) generally parallels the main provisions of the FESA and is administered by the CDFW. Its intent is to prohibit take and protect state-listed endangered and threatened species of fish, wildlife, and plants. Unlike its federal counterpart, CESA also applies the take prohibitions to

¹ “Waters of the United States,” as applied to the jurisdictional limits of the Corps under the Clean Water Act, includes all waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters that are subject to the tide; all interstate waters, including interstate wetlands; and all other waters, such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds whose use, degradation, or destruction could affect interstate or foreign commerce; water impoundments; tributaries of waters; territorial seas; and wetlands adjacent to waters. The terminology used by Section 404 of the Clean Water Act includes “navigable waters,” which is defined at Section 502(7) of the act as “waters of the United States, including the territorial seas.”

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species petitioned for listing (state candidates). Candidate species may be afforded temporary protection as though they were already listed as threatened or endangered at the discretion of the Fish and Game Commission. Unlike the FESA, CESA does not include listing provisions for invertebrate species. Under certain conditions, CESA has provisions for take through a 2081 permit or memorandum of understanding. In addition, some sensitive mammals and birds are protected by the state as “fully protected species.” California “species of special concern” are species designated as vulnerable to extinction due to declining population levels, limited ranges, and/or continuing threats. This list is primarily a working document for the CDFW’s California Natural Diversity Database, which maintains a record of known and recorded occurrences of sensitive species. Informally listed taxa are not protected per se, but warrant consideration in the preparation of biological resources assessments.

Local

City of San Diego Municipal Code

According to Section 62.0604, Removal of Planting Without Permit Prohibited, trees within any street or public highway cannot be removed without a permit from the Park and Recreation Director.

Torrey Pines Community Plan

The Torrey Pines Community is rich in valuable biological resources, with the most sensitive of these habitats being Coastal Marsh, Riparian, Coastal Mixed Chaparral, Chamise Chaparral, Coastal Sage Scrub, Grasslands, and Torrey Pine Woodland. The Torrey Pines Community Plan includes the following policies pertaining to biological resources to ensure the protection of these resources:

- Land uses adjacent to environmentally sensitive habitats shall not negatively impact those areas.
- Development impacts to rare, threatened, endangered, or candidate species shall be minimized or eliminated.
- No filling, clearing, grubbing, or other disturbance of biologically sensitive habitats shall be permitted without approved mitigation plans.
- Coastal lagoons and estuaries that are designated and zoned open space shall remain undeveloped.
- New development adjacent to and impacting biologically sensitive areas shall be responsible for the restoration and enhancement of that area. In particular, when mitigation areas are needed for public projects, the disturbed areas in Crest Canyon should be revegetated with Coastal Mixed Chaparral and Torrey Pines.
- Preserve and enhance all open space and wildlife corridors, especially those linking Los Penasquitos Lagoon with Torrey Pines State Reserve Extension and the Carroll Canyon Creek Corridor.

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- Crest Canyon shall be left in its natural state in order to preserve those biologically sensitive habitats identified within this park. A small portion of parkland located adjacent to Del Mar Heights Road and Durango Drive should accommodate some limited passive park development.
- Maintain regulations that prohibit contaminated runoff from reaching any of the sensitive open space areas designated in this Plan.
- Conditions of approval for all development that impacts adjacent open space areas should include restoration and enhancement measures for that particular area.
- All Torrey Pine trees on public property should be preserved and protected.
- Provide pedestrian/bicycle linkages so that all open space areas will be connected.

5.1.1.2 EXISTING CONDITIONS

Animals

Special Status Animal Species

No special animal species were observed during the surveys. None are expected within or adjacent to the project footprint given its disturbed, developed, and landscaped condition. Additionally, the adjacent southern maritime chaparral habitat is not considered to be suitable for the Federal listed threatened, and State Species of Special Concern coastal California gnatcatcher, a species sensitive to excessive noise such as that which can occur during construction. The adjacent habitat is not considered suitable for this species as it is chaparral, and the gnatcatcher's habitat is Diegan coastal sage scrub which does not occur on or adjacent to the project site.

Nesting Birds

The ornamental vegetation and southern maritime chaparral have potential to support nesting bird species that would fall under the protection of the MBTA and California Fish and Game Code. No active or inactive nests were noted during the site visits.

Vegetation

The project site supports one sensitive upland vegetation community — southern maritime chaparral (0.8 acre). Non-sensitive disturbed land (0.5 acre), ornamental vegetation (1.4 acres), and developed land (8.6 acres) are also present on the site.

Southern Maritime Chaparral

Southern maritime chaparral is a highly sensitive upland chaparral community that occurs along the coastal regions within the fog belt on sandy soils. This community has a Global (full natural range within and outside of California) and State (within California) rank of 1 and is considered very rare and threatened per the CNDDDB. Some common plant species observed within this community onsite include black sage (*Salvia*

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mellifera), California buckwheat (*Eriogonum fasciculatum*), wart-stemmed ceanothus, and chamise (*Aldenostoma fasciculatum*).

Short-leaved Dudleya

One State-listed endangered species, short-leaved dudleya, was reported to the CNDDDB in 2016 in two locations in the vicinity of the project site: in Canyon Crest Open Space Park northwest of the project site and in the extension of Torrey Pines State Reserve Extension (and MHPA) south and west of the project site. Short-leaved dudleya can occur in southern maritime chaparral (and coastal scrub) where Torrey sandstone soil is present on open, flatter areas. While southern maritime chaparral is present on the project site, Torrey sandstone is not present. Additionally, the entirety of the proposed project impacts would occur on previous fill material associated with the school construction that is not suitable for this species.

Disturbed Land

Areas mapped as disturbed land were bare ground or were clearly dominated by non-native forb species including black mustard (*Brassica nigra*), garland daisy (*Glebionis coronaria*), and Hottentot's fig (*Carpobrotus edulis*). The disturbed land mapped is located along the southern and eastern fence limits of the existing school and ball fields. This area corresponds with the manufactured slopes between the school and adjacent canyons. Disturbed land is not considered a sensitive biological resource.

Ornamental

Ornamental vegetation occurs in association with developed areas and is characterized by species such as Torrey pine, Mexican fan palm (*Washingtonia robusta*), acacia (*Acacia cyclops*), myoporum (*Myoporum laetum*), eucalyptus trees (*Eucalyptus* sp.), and numerous planted/introduced ornamental shrub species. Ornamental vegetation is not considered to be a sensitive biological resource.

Developed

Developed land includes the existing school and associated pavements, field, parking, and driveway. Developed land is not considered sensitive biological resource.

Special-Status Plant Species

No annual, special status plant species were found.

Four perennial, evergreen shrub and tree species reported in the vicinity to the CNDDDB that are identifiable year-round were specifically looked for during visits to and adjacent to the site. These species included Torrey pines (*Pinus torreyana*), wart-stemmed ceanothus (*Ceanothus verrucosus*), Nuttall's scrub oak, and Del Mar manzanita (*Arctostaphylos glandulosa* ssp. *crassifolia*).

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Torrey Pines

Torrey pines were observed within the school landscaped areas, but because they were planted from nursery stock and are ornamental in nature, they are not of special status. Only naturally occurring trees are considered sensitive by the California Native Plant Society.

Del Mar Manzanita

Del Mar Manzanita was observed offsite and is federal listed as endangered.

Wart-Stemmed Ceanothus and Nuttall's Scrub Oak

Wart-stemmed ceanothus and Nuttall's scrub oak were found on the project site but outside the impact footprint. They were also found offsite. Wart-stemmed ceanothus and Nuttall's scrub oak are considered sensitive by the California Native Plant Society; neither is State or Federal listed as threatened or endangered.

Brush Management

The project includes brush management to protect the school from wildfire. Brush Management Zone 1 has been incorporated on the development pad, and its width has been increased allowing for a corresponding decrease in Zone 2. Zone 1 would consist of pavement and permanently irrigated ornamental plantings. Zone 2 would receive seasonal maintenance such as removal of dead, woody plants and periodic pruning and thinning of trees and shrubs. Where Zone 2 overlaps with an outfall repair, the revegetation would be with native species that are low fuel, fire resistive, and do not grow to more than two feet in height. Temporary irrigation would be installed, if necessary, to establish the plants.

5.1.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

- B-1 Have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- B-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.
- B-3 Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.
- B-4 Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

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- B-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.
- B-6 Conflict with the provisions of an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The Initial Study, included as Appendix 1-1 substantiates that impacts associated with the following thresholds would result in no impact:

- Threshold B-2
- Threshold B-3
- Threshold B-4
- Threshold B-5
- Threshold B-6

These impacts will not be addressed in the following analysis.

5.1.3 Plans, Programs, and Policies

- PPP B-1 The proposed project would be required to comply with the California Fish and Game Code Sections 3503 et seq., particularly the Fish and Game Code statutes relevant to the protection of birds and active nests.
- PPP B-2 The proposed project would be required to comply with the Land Use Adjacency Guidelines of the MSHCP.

5.1.4 Environmental Impacts

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

Direct Impacts

A direct impact is a physical change in the environment, which is caused by, and immediately related to, the project. An example of a direct physical change in the environment is the removal of vegetation due to grading. All proposed improvements, construction staging areas, and areas of disturbance (except those for outfall repairs) would occur within the existing fence of the project site, which would be maintained to ensure that construction activity does not extend outside this boundary. The fencing also prevents intrusion into the adjacent MHPA.

Direct Impacts to Vegetation Communities

Project construction would remain almost entirely within the fenced limits of the existing school, and removal of disturbed land and ornamental vegetation (as well as developed land) would occur there, and

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because those vegetation communities are not sensitive, the impacts would not be significant. Where construction would occur outside the fenced school limits, two small areas would be directly impacted by the removal of disturbed land and southern maritime chaparral for stormwater outfall repairs. The repair of one of the outfalls, located along the southern project boundary, would encroach slightly into sensitive southern maritime chaparral where no special status species occur and would temporarily impact less than 0.01 acre, which would be revegetated with native species. Therefore, this impact would be less than significant.

Brush Management Zone 2 activities (i.e., removal of dead, woody plants and periodic pruning and thinning) would not remove or result in a significant impact to sensitive vegetation communities or sensitive species. Therefore, this impact is considered to be less than significant.

Special Status Plant Species

No special status plant species occur within the proposed project impact limits, and none is anticipated to occur because: 1) the school property was developed in the 1960s and sits on fill material, 2) the majority of the impacts would be to the developed area inside its fence line, and 3) the impacts to native vegetation outside the fence line for the southern outfall repairs would only affect less than 0.01 acre. As such, the project would not result in significant impacts to special status plant species.

Figure 5.1-1, *Biological Resources*, shows the existing vegetation types as well as the drainage improvements proposed for the project site. Figure 5.1-2, *Slope Restoration Site 1*, and Figure 5.1-3, *Slope Restoration Site 2*, show the locations of the outfalls. Figure 5.1-4, *Photos of Slope Restoration Sites*, shows the eroded conditions at the two stormwater outfalls.

Conclusion

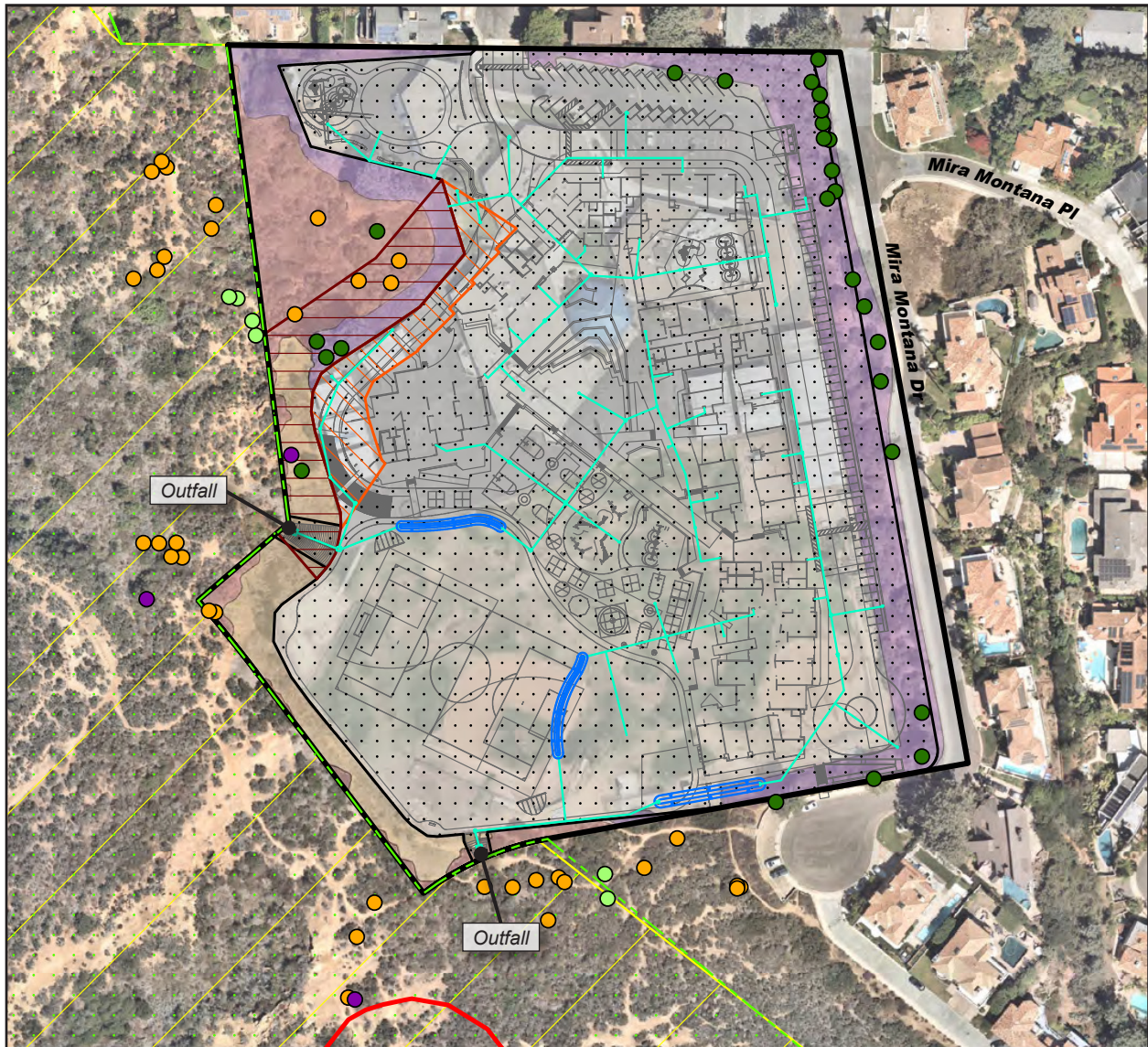
The project would directly impact less than 0.01 acre of sensitive southern maritime chaparral during repair of the southern outfall. This impact would be temporary and would be below the level of significance. Additionally, impacts from Brush Management Zones 1 and 2 would not result in significant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

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

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

Level of Significance Before Mitigation: Impact 5.1-1 would be less than significant.

Figure 5.1-1 - Biological Resources
 5. Environmental Analysis



- | | |
|---|---|
| <ul style="list-style-type: none"> Project Boundary Project Impacts Brush Management Zone 1 Brush Management Zone 2¹ Storm Drain Bioretention Basin Energy Dissipator (Rip-rap) City of San Diego Multi-Habitat Planning Area (MHPA) Torrey Pines State Reserve Extension CNDDDB Record for Short-leaved Dudleya (<i>Dudleya brevifolia</i>) | <p>Vegetation</p> <ul style="list-style-type: none"> Southern Maritime Chaparral Ornamental Disturbed Land Developed <p>Special Status Species</p> <ul style="list-style-type: none"> Del Mar Manzanita (<i>Arctostaphylos glandulosa</i> ssp. <i>crassifolia</i>) Nuttall's Scrub Oak (<i>Quercus dumosa</i>) Torrey Pine (<i>Pinus torreyana</i>), Ornamental, landscaped individual Wart-stemmed Ceanothus (<i>Ceanothus verrucosus</i>) |
|---|---|

¹Brush Management Zone 2 is Impact neutral

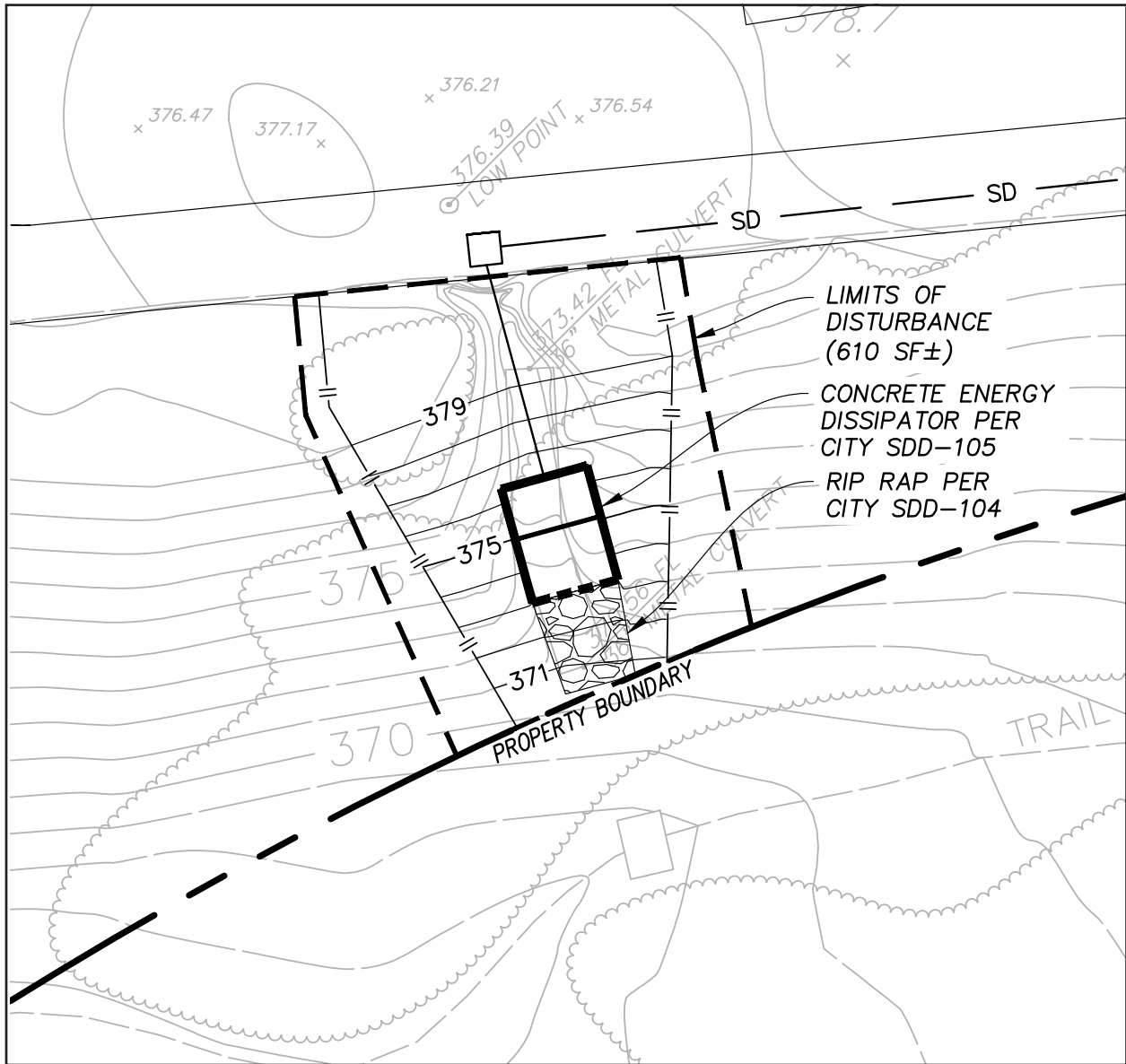


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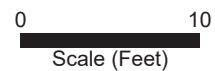
BIOLOGICAL RESOURCES

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Figure 5.1-2 - Slope Restoration Site 1
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*Slopes at existing outfalls to be restored to original condition and native plantings provided.

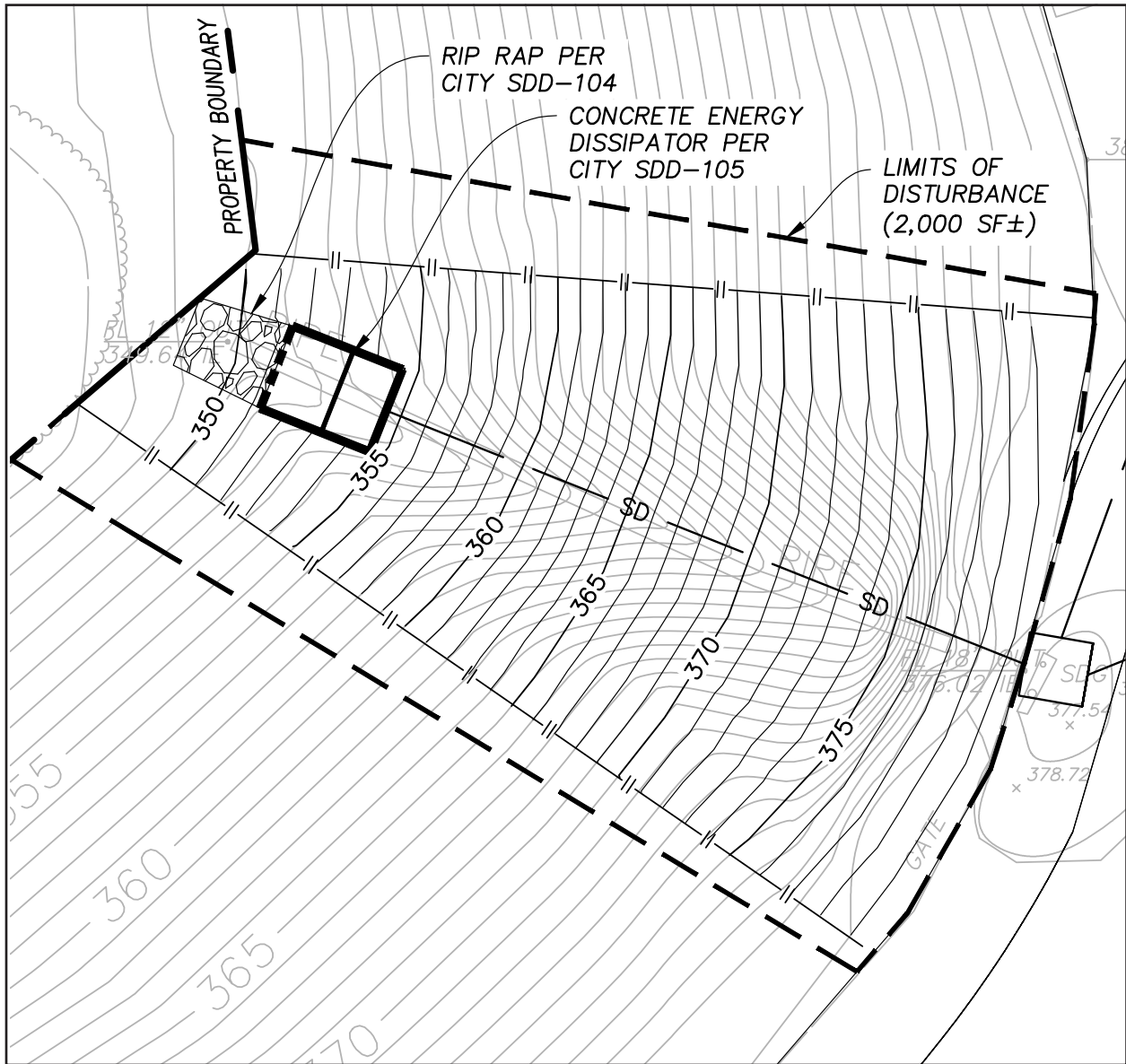


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Figure 5.1-3 - Slope Restoration Site 2
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*Slopes at existing outfalls to be restored to original condition and native plantings provided.

0 10
Scale (Feet)



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Figure 5.1-4 - Photographs of Slope Restoration Sites
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Slope Restoration Site 1



Slope Restoration Site 2

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5.1.5 Cumulative Impacts

The area considered for cumulative impacts to biological resources is the project site and the region. Many other projects in the city would impact sensitive species directly and/or indirectly through impacts on those species' habitats. Other projects would be required to comply with existing laws and regulations protecting biological resources.

The proposed project would impact one sensitive biological resource through the temporary removal of less than 0.01 acre of southern maritime chaparral. The impacted area would be revegetated with native species following construction. Even if the revegetation over the long term does not result in southern maritime chaparral vegetation, and the loss of less than 0.01 acre of southern maritime chaparral from the project becomes permanent, the loss from the project would not be a substantial contribution to the additive effect on southern maritime chaparral in combination with losses from past, present, and foreseeable project impacts due to the very small area affected.

5.1.6 Level of Significance Before Mitigation

Upon implementation of regulatory requirements and standard conditions of approval, Impact 5.1-1 would be less than significant.

5.1.7 Mitigation Measures

No mitigation measures are required.

5.1.8 Level of Significance After Mitigation

Impacts would be less than significant.

5.1.9 References

Alden Environmental, Inc. (Alden). 2021, April 27. Biological Technical Report for the Del Mar Heights Elementary School Rebuild Project (Appendix 5.1-1).

U.S. Department of the Interior (DOI). 2019, December 22. M-37050, Memorandum, The Migratory Bird Treaty Act Does not Prohibit Incidental Take. <https://www.doi.gov/sites/doi.gov/files/uploads/m-37050.pdf>

U.S. Fish and Wildlife Service (USFWS). 2018, April 11. Memorandum, Guidance on the recent M-Opinion affecting the Migratory Bird Treaty Act. <https://theiwrc.org/wp-content/uploads/2018/05/m-opinion-memo.pdf>

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5.2 NOISE

This section of the DEIR evaluates the potential for implementation of the proposed project to result in noise impacts in the City of San Diego. Regulatory background information and noise modeling outputs are included in Appendix 5.2-1 to this DEIR.

Noise and Vibration Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.” Based on the known adverse effects of noise, the federal government, the State of California, and many local governments have established criteria to protect public health and safety and to prevent disruption of certain human activities.

The following are brief definitions of terminology used in this chapter.

1. **Sound.** A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.
2. **Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
3. **Decibel (dB).** A unitless measure of sound on a logarithmic scale.
4. **A-Weighted Decibel (dBA).** An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
5. **Equivalent Continuous Noise Level (L_{eq}); also called the Energy-Equivalent Noise Level.** The value of an equivalent, steady sound level which, in a stated time period (often over an hour) and at a stated location, has the same A-weighted sound energy as the time-varying sound. Thus, the L_{eq} metric is a single numerical value that represents the equivalent amount of variable sound energy received by a receptor over the specified duration.
6. **Statistical Sound Level (L_n).** The sound level that is exceeded “n” percent of time during a given sample period. For example, the L_{50} level is the statistical indicator of the time-varying noise signal that is exceeded 50 percent of the time (during each sampling period); that is, half of the sampling time, the changing noise levels are above this value and half of the time they are below it. This is called the “median sound level.” The L_{10} level, likewise, is the value that is exceeded 10 percent of the time (i.e., near the maximum) and this is often known as the “intrusive sound level.” The L_{90} is the sound level exceeded 90 percent of the time and is often considered the “effective background level” or “residual noise level.”

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7. **Day-Night Sound Level (L_{dn} or DNL).** The energy-average of the A-weighted sound levels occurring during a 24-hour period, with 10 dB added to the sound levels occurring during the more sensitive period from 10:00 pm to 7:00 am.
8. **Community Noise Equivalent Level (CNEL).** The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added from 7:00 pm to 10:00 pm and 10 dB from 10:00 pm to 7:00 am during the more sensitive hours. For general community/environmental noise, CNEL and L_{dn} values rarely differ by more than 1 dB (with the CNEL being only slightly higher than the L_{dn} value). As a matter of practice, L_{dn} and CNEL values are interchangeable and are treated as equivalent in this assessment.
9. **Peak Particle Velocity (PPV).** The peak signal value of an oscillating vibration velocity waveform, usually expressed in inches per second (in/sec).
10. **Sensitive Receptor.** Noise- and vibration-sensitive receptors include land uses where quiet environments are necessary for enjoyment and public health and safety. Residences, schools, motels and hotels, libraries, religious institutions, hospitals, and nursing homes are examples.

Sound Fundamentals

Sound is described in terms of loudness (measured in decibels), pitch (measured in Hertz or cycles per second), and duration (measured in seconds or minutes). The standard unit for measuring loudness is the decibel (dB). Changes of 1 to 3 dBA are detectable under quiet, controlled conditions, and changes of less than 1 dBA are usually indiscernible. A 3 dBA change in noise levels is considered the minimum change that is detectable with human hearing in outside environments. A change of 5 dBA is readily discernible to most people in an exterior environment, and a 10 dBA change is perceived as a doubling (or halving) of the sound.

The human ear is not equally sensitive to all frequencies. Sound waves below 16 Hz are not heard at all and are “felt” more as a vibration. Similarly, while people with extremely sensitive hearing can hear sounds as high as 20,000 Hz, most people cannot hear above 15,000 Hz. In all cases, hearing acuity falls off rapidly above about 10,000 Hz and below about 200 Hz. Since the human ear is not equally sensitive to sound at all frequencies, the A-weighted decibel scale (dBA) compensates for this in a manner approximating the sensitivity of the human ear. That is, an A-weighted noise level de-emphasizes low and very high frequencies of sound similar to the human ear’s de-emphasis of these frequencies.

Sound Measurement

Sound pressure is measured through the A-weighted measure to correct for the relative frequency response of the human ear.

Unlike linear units such as inches or pounds, decibels are measured on a logarithmic scale, representing points on a sharply rising curve. On a logarithmic scale, an increase of 10 dBA is 10 times more intense than 1 dBA, 20 dBA is 100 times more intense, and 30 dBA is 1,000 times more intense. A sound as soft as human breathing is about 10 times greater than 0 dBA. Ambient sounds generally range from 30 dBA (very quiet) to 100 dBA (very loud).

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Sound levels decrease as the distance from their source increases. This phenomenon is known as “spreading loss.” For a single point source, sound levels decrease by approximately 6 dBA for each doubling of distance from the source. This drop-off rate is appropriate for analyzing noise generated by on-site operations from stationary equipment or activity at a project site. If noise is produced by a line source, such as highway traffic, the sound decreases by 3 dBA for each doubling of distance in a hard site environment (e.g., hard ground or asphalt). Line source noise in a relatively flat environment with absorptive vegetation decreases by 4.5 dBA for each doubling of distance.

Time variation in noise exposure is typically expressed in terms of a steady-state energy level equal to the energy content of the time varying period (called L_{eq}), or alternately, as a statistical description of the sound level that is exceeded over some fraction of a given observation period. For example, the L_{50} noise level represents the noise level that is exceeded 50 percent of the time. Similarly, the L_2 , L_8 , and L_{25} values represent the noise levels that are exceeded 2, 8, and 25 percent of the time or 1, 5, and 15 minutes per hour. These “L” values are typically used to demonstrate compliance for stationary noise sources with a city’s noise ordinance, as discussed below. Other values typically noted during a noise survey are the L_{min} and L_{max} . These values represent the minimum and maximum root-mean-square noise levels obtained over the measurement period.

Because community receptors are more sensitive to unwanted noise intrusion during the evening and at night, an artificial dB increment is added to quiet time noise levels in a 24-hour noise descriptor called the Community Noise Equivalent Level (CNEL) or Day-Night Noise Level (L_{dn}). See “Noise and Vibration Fundamentals” at the beginning of this section.

Psychological and Physiological Effects of Noise

Physical damage to human hearing begins at prolonged exposure to noise levels higher than 85 dBA. Exposure to high noise levels affects our entire system, with prolonged noise exposure in excess of 75 dBA increasing body tensions and affecting blood pressure, functions of the heart, and the nervous system. In comparison, extended periods of noise exposure above 90 dBA could result in permanent hearing damage. When the noise level reaches 120 dBA, it causes a tickling sensation in the human ear, even with short-term exposure. This is called the threshold of feeling. As the sound reaches 140 dBA, the tickling sensation becomes painful, and this is called the threshold of pain. Table 5.2-1, *Typical Noise Levels*, shows typical noise levels from familiar noise sources.

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Table 5.2-1 Typical Noise Levels

Common Outdoor Activities	Noise Level (dBA)	Common Indoor Activities
Onset of physical discomfort	120+	
	110	Rock Band (near amplification system)
Jet Flyover at 1,000 feet	100	
Gas Lawn Mower at three feet	90	
Diesel Truck at 50 feet, at 50 mph	80	Food Blender at 3 feet Garbage Disposal at 3 feet
Noisy Urban Area, Daytime	70	Vacuum Cleaner at 10 feet Normal speech at 3 feet
Commercial Area Heavy Traffic at 300 feet	60	Large Business Office Dishwasher Next Room
Quiet Urban Daytime	50	Theater, Large Conference Room (background)
Quiet Urban Nighttime	40	Library
Quiet Suburban Nighttime	30	Bedroom at Night, Concert Hall (background)
Quiet Rural Nighttime	20	Broadcast/Recording Studio
	10	
Lowest Threshold of Human Hearing	0	Lowest Threshold of Human Hearing

Source: Caltrans 2013a.

Vibration Fundamentals

Vibration is an oscillatory motion through a solid medium; the motion's amplitude can be described in terms of displacement, velocity, or acceleration. Vibration is normally associated with railroads or vibration-intensive stationary sources, but can also be caused by construction equipment such as jackhammers, pile drivers, and hydraulic hammers. As with noise, vibration can be described by both its amplitude and frequency. Vibration displacement is the distance that a point on a surface moves away from its original static position; velocity is the instantaneous speed that a point on a surface moves; and acceleration is the rate of change of the speed. Each of these descriptors helps correlate vibration to human response, building damage, and acceptable equipment vibration levels. During construction, the operation of construction equipment can cause groundborne vibration.

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Vibration amplitudes are usually described in terms of either the peak particle velocity (PPV) or the root mean square (RMS) velocity. PPV is the maximum instantaneous peak of the vibration signal and RMS is the square root of the average of the squared amplitude of the signal. PPV is more appropriate for evaluating potential building damage.

As vibration waves are transmitted from a source, the energy is spread over an ever-increasing area and is reduced with distance from the energy source. Further reduction varies with soil type and condition and the frequency of the wave.

As with airborne sound, annoyance with vibrational energy is a subjective measure, depending on the level of activity and the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Persons accustomed to elevated ambient vibration levels, such as in an urban environment, may tolerate higher vibration levels. Table 5.2-2, Human Reaction to Typical Vibration Levels, displays the human response and the effects on buildings resulting from continuous vibration (in terms of various levels of PPV).

Table 5.2-2 Human Reaction to Typical Vibration Levels

Vibration Level, PPV (in/sec)	Human Reaction	Effect on Buildings
0.006–0.019	Threshold of perception, possibility of intrusion	Vibrations unlikely to cause damage of any type
0.08	Vibrations readily perceptible	Recommended upper level of vibration to which ruins and ancient monuments should be subjected
0.10	Level at which continuous vibration begins to annoy	Virtually no risk of “architectural” (i.e., not structural) damage to normal buildings
0.20	Vibrations annoying to people in buildings	Threshold at which there is a risk to “architectural” damage to normal dwellings—houses with plastered walls and ceilings
0.4–0.6	Vibrations considered unpleasant by people subjected to continuous vibrations and unacceptable to some people walking on bridges	Vibrations at a greater level than normally expected from traffic, but would cause “architectural” damage and possibly minor structural damage

Source: Caltrans 2013b.

5.2.1 Environmental Setting

5.2.1.1 REGULATORY BACKGROUND

State

California Code of Regulations

Title 24, Part 11. The California Green Building Standards Code (CALGreen) has requirements for insulation that affect exterior-interior noise transmission for nonresidential structures. Pursuant to CALGreen Section 5.507.4.1, Exterior Noise Transmission, an architectural acoustics study may be required when a project site is within a 65 dBA CNEL or L_{dn} noise contour of an airport, freeway or expressway, railroad, industrial source or fixed-guideway source. Where noise contours are not readily available, if buildings are

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exposed to a noise level of 65 dBA L_{eq} during any hour of operation, specific wall and ceiling assembly and sound-rated windows may be necessary to reduce interior noise to acceptable levels. A performance method may also be used per Section 5.507.4.2 to show compliance with State interior noise requirements.

Title 5, Section 14040(q). Under Title 5, the California Department of Education (CDE) regulations require the school district to consider noise in the site selection process. As recommended by CDE guidance, if a school district is considering a potential school site near a freeway or other source of noise, it should hire an acoustical engineer to determine the level of sound that the site is exposed to and to assist in designing the school should that site be chosen.

General Plan Guidelines

The State of California, through its General Plan Guidelines, discusses how ambient noise should influence land use and development decisions and includes a table of normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable uses at different noise levels expressed in CNEL or L_{dn} . A conditionally acceptable designation implies new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements for each land use is made and needed noise insulation features are incorporated in the design. By comparison, a normally acceptable designation indicates that standard construction can occur with no special noise reduction requirements. Local municipalities adopt these compatibility standards as part of their General Plan and modify them as appropriate for their local environmental setting. The City of San Diego standards are discussed below.

Local

San Diego California Environmental Quality Act Significance Determination Thresholds

The City of San Diego provides noise thresholds in Chapter K, Noise, of its “CEQA Significance Determination Thresholds” guidance document for determining significant impacts. Where applicable, these recommended criteria are adopted as significance thresholds in this analysis.

City of San Diego Noise Regulations

The City of San Diego Municipal Code includes noise standards in Chapter 5, Article 9.5, Noise Abatement and Control. This section provides noise regulations from the municipal code that are applicable to the proposed project. Per Section 59.5.0404 of the municipal code, construction activities are limited to the hours of 7:00 am to 7:00 pm Monday through Saturday and are prohibited on legal holidays (except Columbus Day and Washington’s Birthday) and Sundays. Construction noise is limited to an average of 75 dBA L_{eq} at or beyond a residential property line during the 12-hour period from 7:00 am to 7:00 pm.

The City of San Diego does not establish vibration thresholds; therefore, for the purposes of this analysis the Federal Transit Administration (FTA) threshold of 0.2 inches/second (in/sec) peak particle velocity (PPV) will be used to assess vibration impacts at non-engineered structures (e.g., wood-frame residential) (FTA 2018). This FTA criterion is commonly used and accepted as standard practice for assessing potential vibration impacts.

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5.2.1.2 EXISTING CONDITIONS

Existing Noise Environment

The proposed project is between the Torrey Pines Extension State Park and residential uses. The closest residential uses are single-family homes north, east, and south of the site. The state park is adjacent to the school property to the south and west. The Gully Trailhead access point is south at the end of the Mira Montana Drive cul-de-sac, and the Gully Trail runs along the southern property line of the school before heading north.

Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, hospital facilities, houses of worship, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. Sensitive receptors surrounding the proposed reconstruction of Del Mar Heights are single-family homes to the north, east, and south and the Torrey Pines Extension State Park and trails to the south and west. Nearby residential receptor locations used for construction noise modeling, numbered 1 to 34, are shown in Figure 5.2-1, *Nearby Sensitive Receptors*. Receptors 1 to 4 represent the first row of residential receptors to the north; Receptors 5 to 8 represent the second row of residential receptors to the north; Receptors 25 to 28 represent the third row of residential receptors to the north; and Receptors 30 to 33 represent the fourth row of residential receptors to the north. Receptors 22 to 24 represent residential receptors to the south, and the remaining receptors are the first and second row of residences to the east.

Ambient Noise Monitoring

To determine baseline noise levels within the project vicinity, ambient noise monitoring was conducted by PlaceWorks in April 2021. Six short-term (15-minute) measurements were conducted on Thursday, April 8, 2021.

The primary noise sources during measurements were light local traffic, aircraft overflights, and typical neighborhood activities. Meteorological conditions during the measurement period were favorable for outdoor sound measurements and were noted to be representative of the typical conditions for the season. Generally, conditions included clear skies with midday temperatures of 65 to 67 degrees Fahrenheit (°F), and average wind speeds between 5 to 6 miles per hour (mph). The sound level meter was equipped with a windscreen during measurements.

All sound level meters used for noise monitoring satisfy the American National Standards Institute (ANSI) standard for Type 1 instrumentation.¹ The sound level meters were set to “slow” response and “A” weighting (dBA).² The meter was calibrated before and after the monitoring period. All measurements were at least five feet above the ground and away from reflective surfaces. Noise measurement locations are described below

¹ Monitoring of ambient noise was performed using a Larson-Davis model LxT sound level meter.

² “Slow” response is the most appropriate for a typical outdoor noise environment where sound levels are constantly fluctuating, such as in the project area.

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and shown in Figure 5.2-2, *Approximate Noise Monitoring Locations*. The short-term noise measurement results are summarized in Table 5.2-3. Midday average ambient noise levels ranged from approximately 50 to 56 dBA L_{eq} .

Table 5.2-3 Short-Term Noise Measurements Summary in A-Weighted Sound Levels

Monitoring Location	Description	15-minute Noise Level, dBA						
		L_{eq}	L_{max}	L_{min}	L_2	L_8	L_{25}	L_{50}
ST-1	Northern school property line with residence on Boquita Drive, 3:04 PM, 4/8/2021	56.4	73.9	40.8	68.4	56.6	51.4	46.8
ST-2	13603 Boquita Drive, 3:21 PM, 4/8/2021	50.1	63.4	40.7	56.8	54.5	51.0	47.4
ST-3	13595 Mira Montana Drive, 3:43 PM, 4/8/2021	55.1	76.0	43.1	63.8	57.6	52.3	48.8
ST-4	13575 Mira Montana Drive, 12:59 PM, 4/8/2021	53.9	74.8	41.1	63.3	53.0	49.4	47.2
ST-5	13565 Mira Montana Drive, 12:40 PM, 4/8/2021	53.7	69.4	43.5	64.2	56.5	50.5	48.6
ST-6	Between 13525 and 13535 Mira Montana Drive, 12:21 PM, 4/8/2021	53.7	70.3	42.9	64.6	55.4	50.1	47.8

The following describes the noise monitoring locations:

- **Short-Term Location 1 (ST-1)** was at the northern school property line with a residence on Boquita Drive. A 15-minute noise measurement was conducted, beginning at 3:04 pm on Thursday, April 8, 2021. The noise environment of this site is characterized primarily by neighborhood children playing and occasional aircraft overflights.
- **Short-Term Location 2 (ST-2)** was in front of 13603 Boquita Drive near the northern property line of the school. A 15-minute noise measurement was conducted, beginning at 3:21 pm on Thursday, April 8, 2021. The noise environment of this site is characterized primarily by neighborhood children playing and occasional aircraft overflights.
- **Short-Term Location 3 (ST-3)** was in front of 13595 Mira Montana Drive near the eastern property line of the school. A 15-minute noise measurement was conducted, beginning at 3:43 pm on Thursday, April 8, 2021. The noise environment of this site is characterized primarily by light traffic on Mira Montana Drive and occasional aircraft overflights. There is an existing masonry wall at the school property line with a height of approximately 5 feet, which steps down to approximately 2.5 feet to the south near this location.

Figure 5.2-1 - Nearby Sensitive Receptors



- Project Boundary
- Receptors (34)
- 5.5-ft Existing Wall
- 5-ft Existing Wall
- 2.5-ft Existing Wall

Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021;
 Site Plan: Baker Nowicki Design Studio, 2021

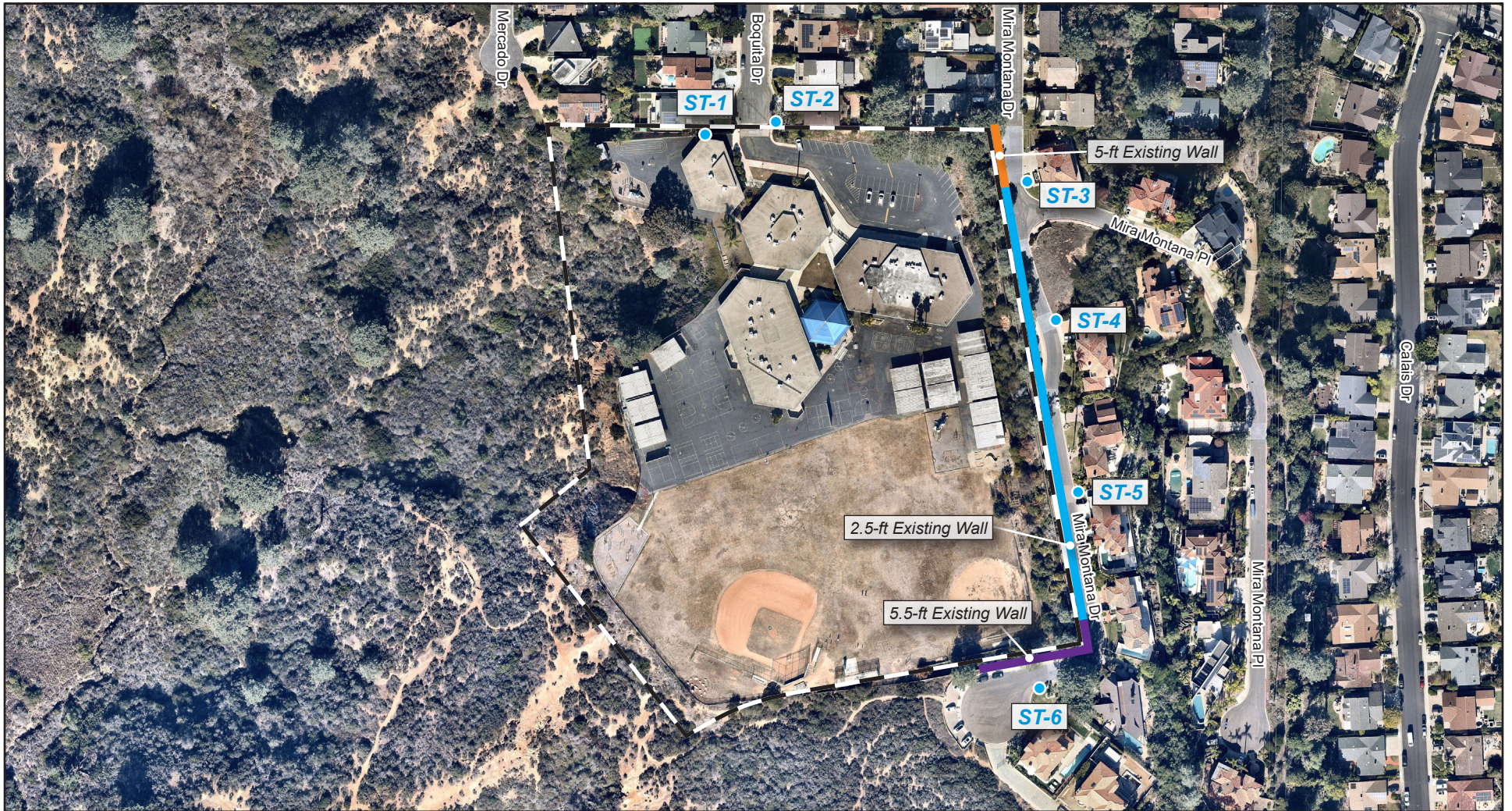


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Figure 5.2-2 - Approximate Noise Monitoring Locations



- Project Boundary
- 5-ft Existing Wall
- 2.5-ft Existing Wall
- 5.5-ft Existing Wall
- **ST-X** Short-Term Noise Measurement Locations (6)

0 195
Scale (Feet)



Source: Nearmap, 2021; PlaceWorks, 2021

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- **Short-Term Location 4 (ST-4)** was in front of 13575 Mira Montana Drive near the eastern property line of the school. A 15-minute noise measurement was conducted, beginning at 12:59 pm on Thursday, April 8, 2021. The noise environment of this site is characterized primarily by light traffic on Mira Montana Drive and occasional aircraft overflights. There is an existing masonry wall at the school property line with a height of approximately 2.5 feet near this location.
- **Short-Term Location 5 (ST-5)** was in front of 13565 Mira Montana Drive near the eastern property line of the school. A 15-minute noise measurement was conducted, beginning at 12:40 pm on Thursday, April 8, 2021. The noise environment of this site is characterized primarily by light traffic on Mira Montana Drive and occasional aircraft overflights. There is an existing masonry wall at the school property line with a height of approximately 2.5 feet near this location. At the time of noise measurement, use of the batting cage at the school was underway, which generated instantaneous maximum noise levels of up to 52 dBA.
- **Short-Term Location 6 (ST-6)** was at the northern residential property line between 13525 and 13535 Mira Montana Drive. A 15-minute noise measurement was conducted, beginning at 12:21 pm on Thursday, April 8, 2021. The noise environment of this site is characterized primarily by light traffic on Mira Montana Drive and occasional aircraft overflights. There is an existing masonry wall at the school property line with a height of approximately 5.5 feet near this location. At the time of noise measurement, use of the batting cage at the school was underway, which generated instantaneous maximum noise levels of up to 52 dBA.

5.2.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would result in:

- N-1 Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies.
- N-2 Generation of excessive groundborne vibration or groundborne noise levels.
- N-3 For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, if the project would expose people residing or working in the project area to excessive noise levels.

The Initial Study, included as Appendix 1-1, substantiates that impacts associated with the following thresholds would be less than significant:

- **Threshold N-3**

This impact will not be addressed in the following analysis. In addition, operational noise and vibration impacts from the proposed project were found to be less than significant in the Initial Study and will not be addressed further.

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San Diego California Environmental Quality Act Significance Determination Thresholds

The City of San Diego provides noise thresholds in Chapter K, Noise, of its “CEQA Significance Determination Thresholds” guidance document for determining significant impacts. Where applicable, these recommended criteria are adopted as significance thresholds in this analysis.

5.2.3 Plans, Programs, and Policies

Plans, programs, and policies (PPP), including applicable regulatory requirements and conditions of approval for noise impacts, are identified below.

PPP NOI-1 Project-related construction activity will be limited to the hours of 7:00 am to 7:00 pm on weekdays and Saturdays. Construction is prohibited on Sundays.

5.2.4 Environmental Impacts

The following impact analysis addresses thresholds of significance for which the Initial Study disclosed potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

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

The total duration for project construction is anticipated to be approximately 14 months, starting in June 2021. Construction would take place during the hours allowed by the municipal code—7:00 am to 7:00 pm, Monday through Saturday. Construction equipment would include equipment such as hydraulic hammers, excavators, dozers, tractors, loaders, graders, cranes, rollers, pavers, air compressors, an asphalt grinder, and a soil nailing drill rig.

Two types of short-term noise impacts could occur during construction: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul and (2) stationary-source noise from use of construction equipment.

Construction Vehicles

The transport of workers and materials to and from the construction site would increase noise levels along site access roadways. Individual construction vehicle pass-bys, including haul trucks, may create momentary noise levels of up to 85 dBA L_{max} at 50 feet. However, these occurrences would generally be infrequent and short-lived.

Worker and vendor trips would total a maximum of 283 daily trips³ during the overlapping activity phases of building construction, paving, and architectural coating. For comparison, student enrollment at Del Mar Heights for the 2018-19 academic year was 495. The student trips would be eliminated during construction,

³ Based on information provided by Del Mar School District and the project air quality modeling.

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and worker and vendor trips would be less than existing trips associated with students. Therefore, construction-related trip noise would result in a less-than-significant impact.

Construction Equipment

Noise generated by on-site construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each stage of construction involves different kinds of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest equipment, and the dominant equipment noise source is typically the engine, though other noise can also be noticeable (such as unloading of materials and hydraulic hammering).

Project construction noise was modeled using reference equipment noise levels from the Federal Highway Administration Roadway Construction Noise Model (FHWA RCNM), which were input to the SoundPLAN noise modeling program. SoundPLAN uses industry-accepted propagation algorithms based on International Organization for Standardization (ISO) standards for outdoor sound propagation. The modeling calculations account for spreading loss plus attenuation factors such as air absorption; ground effects; and shielding from topography, walls and other barriers. There are embankments east, north, and south of the project site, which places some residential receptors at a higher elevation than the school.⁴ These topographic features and elevation changes were accounted for in the SoundPLAN noise modeling. As discussed above, there are existing masonry walls to the east and south of the project site, which were also included in modeling.

The noise produced during an activity phase (e.g., demolition, soil nailing and grading, building construction, and paving) is determined by combining the L_{eq} contributions from the loudest pieces of equipment for that phase while accounting for the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM) usage factor.⁵ Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on the specific activity at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements.

The expected construction equipment mix was categorized by construction activity using RCNM and information provided by the applicant. The associated, aggregate sound levels—grouped by construction activity—at a distance of 50 feet are summarized in Table 5.2-4, *Project-Related Construction Noise dBA Leq*.

⁴ Locations along Mira Montana Drive are up to 20 – 25 feet higher at the residential base elevation than the school base elevation.

⁵ The “acoustical usage factor” is the fraction of time each piece of construction equipment is operating at full power (i.e., its loudest condition).”

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Table 5.2-4 Project-Related Construction Noise at 50 feet (dBA L_{eq})

Construction Activity Phase	Noise Level
Asphalt Demolition	80.0
Building Demolition	84.7
Soil Nailing and Grading	82.7
Building Construction	83.4
Paving	73.0

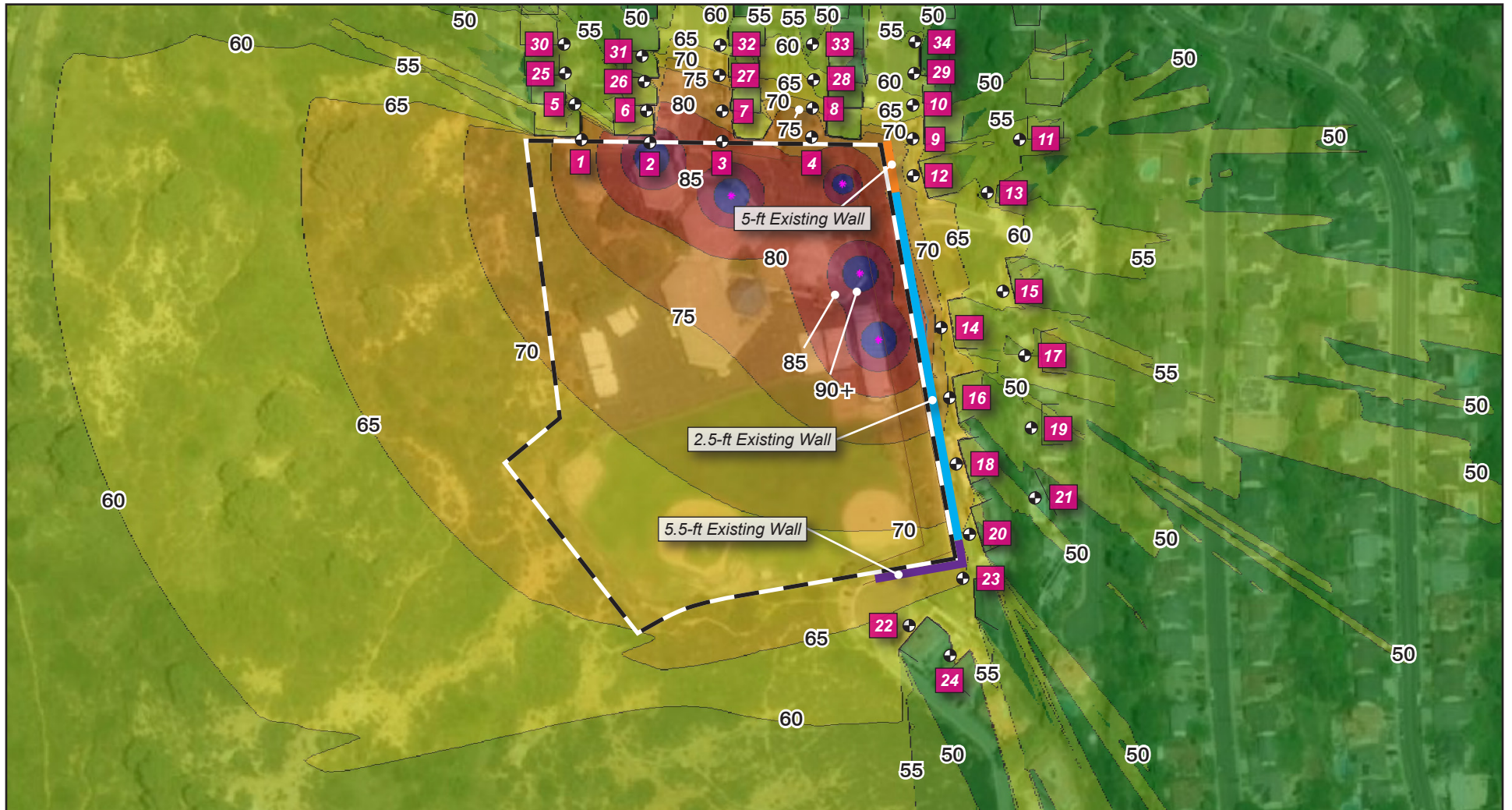
Notes: Calculations performed with the FHWA RCNM software are included in Appendix 5.2-1. These estimates do not factor in topography and other barriers which would provide noise additional attenuation. However, detailed noise modeling using these reference noise levels as inputs in the SoundPLAN noise propagation program do account for surrounding topographical and other shielding features.

Noise levels from project-related construction activities were conservatively calculated from the point or multiple points closest to nearby sensitive receptors and compared with the significance threshold of 75 dBA L_{eq(12-hr)} at the sensitive receptor property line. This approach is conservative because the City’s threshold is based on a 12-hour average noise level, and construction equipment would move around the construction site, not remain in one place the entire workday. Furthermore, comparison with the City’s 12-hour standard is considered conservative, since a typical construction workday for the project would to be 8 to 10 hours. So on typical workdays, construction would not take place for 2 to 4 hours during the 12-hour period. This brings the average 75 dBA L_{eq(12-hr)} noise level down.

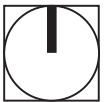
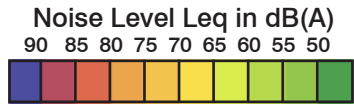
The detailed results of SoundPLAN construction noise modeling are included in Appendix 5.2-1 and displayed graphically as noise contours in Figures 5.2-3 through 5.2-10 for unmitigated conditions. Building and asphalt demolition (see Figure 5.2-3) was modeled by conservatively assuming that building demolition at four of the closest points to sensitive receptors could occur at the same times as asphalt demolition, and noise levels could reach up to 91.2 dBA Leq at Receptor 2, which would exceed the threshold of 75 dBA Leq. Soil nailing⁶ at the base of the embankment to the east is proposed, and modeling assumed that soil nailing would occur at the same times as grading activity. Both activities were conservatively modeled at points closest to residences to the east (see Figures 5.2-4 through 5.2-7). During soil nailing and grading, construction noise levels could reach up to 78.2 dBA Leq at Receptor 18, which would exceed the threshold of 75 dBA Leq. An additional model run for grading was conducted at the south end of the construction site (see Figure 5.2-8), and construction noise levels could reach up to 77.8 dBA Leq at Receptor 20, which would exceed the threshold of 75 dBA Leq. During building construction (see Figure 5.2-9), which was conservatively modeled assuming the simultaneous construction of four of the closest buildings to receptors, construction noise levels could reach up to 76.1 dBA Leq at Receptor 16, which would exceed the threshold of 75 dBA Leq. During paving activity (see Figure 5.2-10), which was conservatively modeled at four simultaneous points closest to nearby receptors, construction noise levels could reach up to 72.7 dBA Leq at Receptor 3, which would not exceed the threshold of 75 dBA Leq. The construction noise modeling indicates that project construction has the potential to exceed the significance threshold of 75 dBA Leq. Therefore, this impact would be potentially significant.

⁶ Soil nailing is a slope stabilization technique where reinforcing elements are drilled into the existing slope.

Figure 5.2-3 - Building and Asphalt Demolition Noise Contours (Unmitigated)



- Project Boundary
- ⊕ XX Receptors (34)
- 5-ft Existing Wall
- 2.5-ft Existing Wall
- 5.5-ft Existing Wall



Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021

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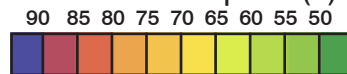
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Figure 5.2-4 - Soil Nailing and Grading North Noise Contours (Unmitigated)



- Project Boundary
- ⊕ XX Receptors (34)
- 5-ft Existing Wall
- 2.5-ft Existing Wall
- 5.5-ft Existing Wall

Noise Level Leq in dB(A)



Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021

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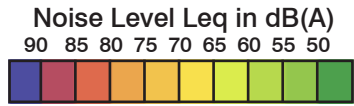
NOISE

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Figure 5.2-5 - Soil Nailing and Grading Center Noise Contours (Unmitigated)



- Project Boundary
- ⊕ XX Receptors (34)
- 5-ft Existing Wall
- 2.5-ft Existing Wall
- 5.5-ft Existing Wall



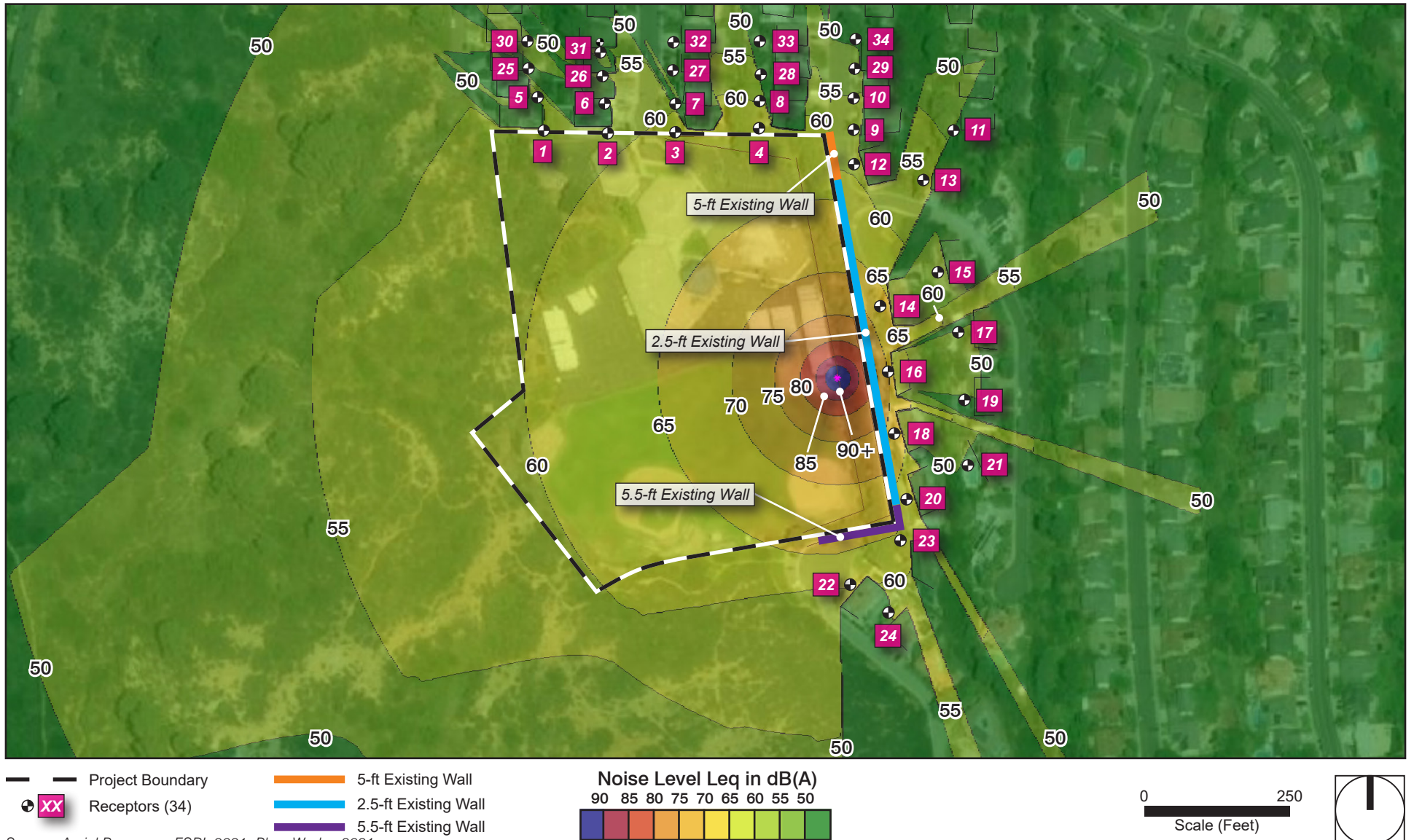
Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021

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Figure 5.2-6 - Soil Nailing and Grading South Central Noise Contours (Unmitigated)



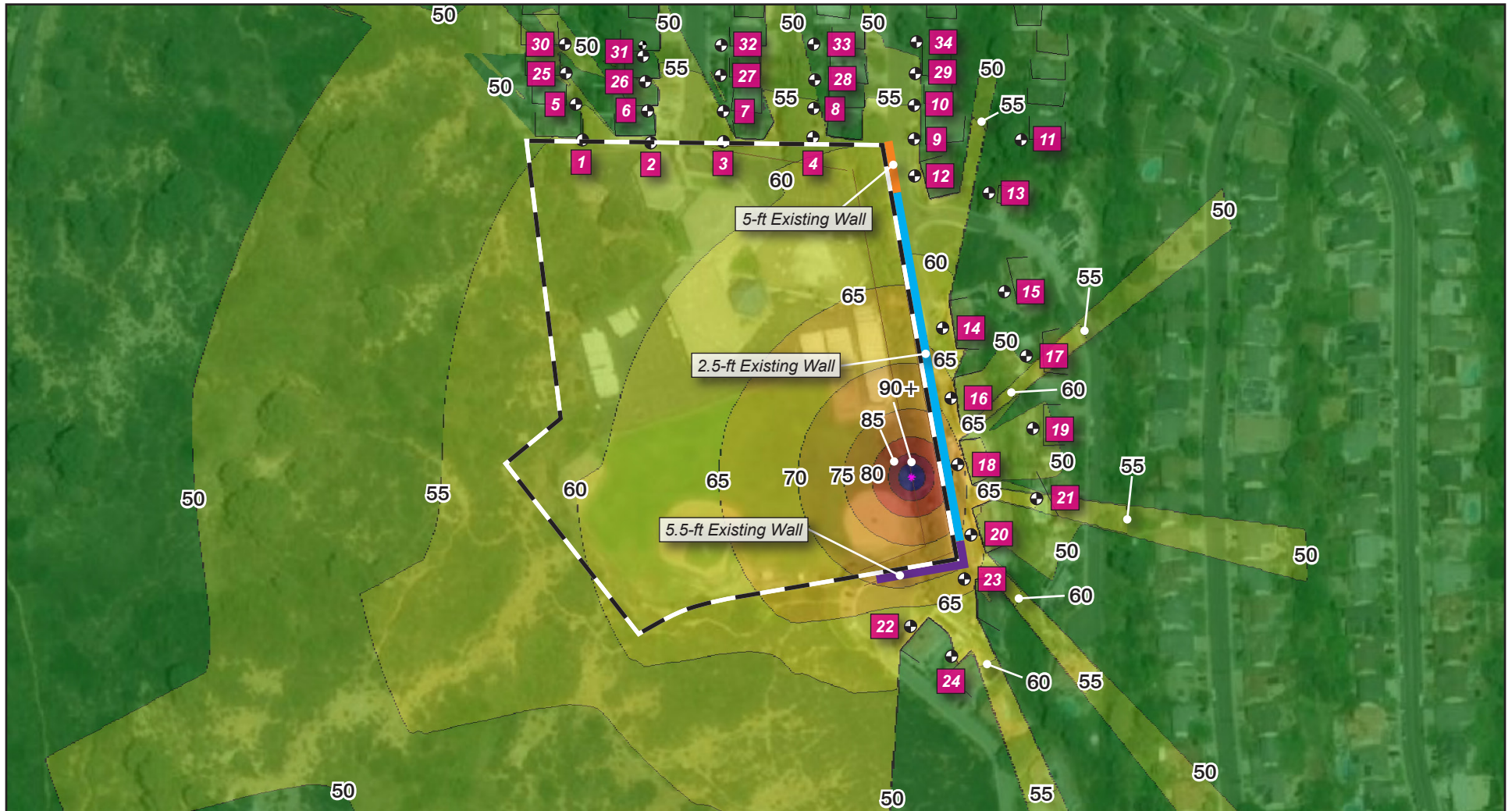
Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021

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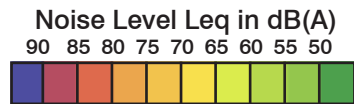
NOISE

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Figure 5.2-7 - Soil Nailing and Grading South Noise Contours (Unmitigated)



- Project Boundary
- ⊕ XX Receptors (34)
- 5-ft Existing Wall
- 2.5-ft Existing Wall
- 5.5-ft Existing Wall



Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021

5. Environmental Analysis

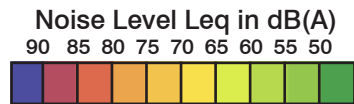
NOISE

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Figure 5.2-8 - Grading South Noise Contours (Unmitigated)



- Project Boundary
- ⊕ XX Receptors (34)
- 5-ft Existing Wall
- 2.5-ft Existing Wall
- 5.5-ft Existing Wall



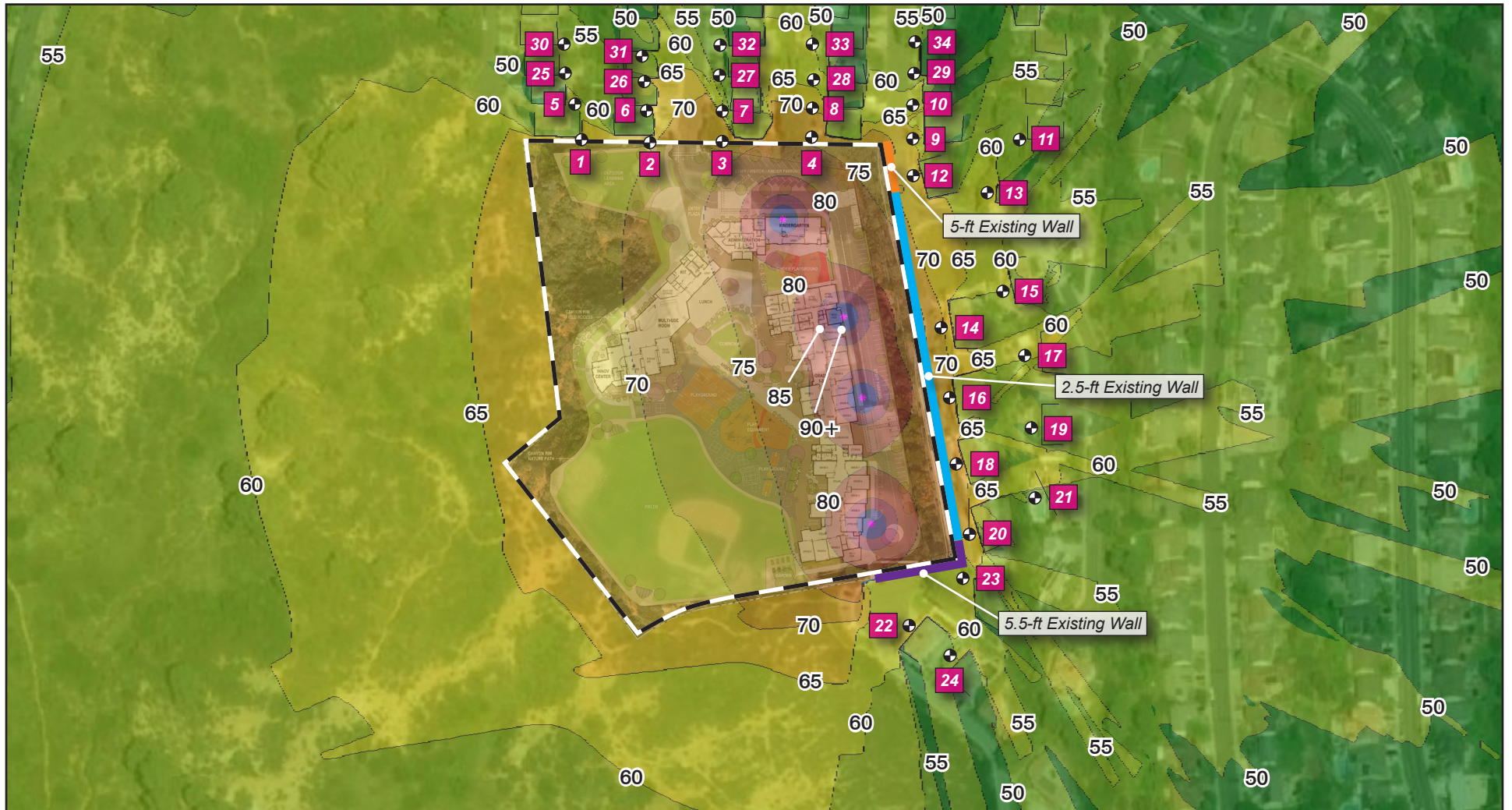
Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021

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Figure 5.2-9 - Building Construction Noise Contours (Unmitigated)



Project Boundary	5.5-ft Existing Wall	5-ft Existing Wall	Noise Level Leq in dB(A) 90 85 80 75 70 65 60 55 50 	 Scale (Feet)	
Receptors (34)	2.5-ft Existing Wall				

Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021;
 Site Plan: Baker Nowicki Design Studio, 2021

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Figure 5.2-10 - Paving Noise Contours (Unmitigated)



Project Boundary	5.5-ft Existing Wall	5-ft Existing Wall	Noise Level Leq in dB(A) 90 85 80 75 70 65 60 55 50 	 Scale (Feet)	
Receptors (34)	2.5-ft Existing Wall				

Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021;
 Site Plan: Baker Nowicki Design Studio, 2021

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Torrey Pines Extension State Park

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

Level of Significance Before Mitigation: Impact 5.2-1 would be potentially significant.

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

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

For reference, a vibration level of 0.2 inches per second (in/sec) peak particle velocity (PPV) is used as the limit for nonengineered timber and masonry buildings (which would apply to the surrounding residential structures) (FTA 2018). Table 5.2-5, *Vibration Levels for Typical Construction Equipment*, summarizes vibration levels for typical construction equipment at a reference distance of 25 feet.

Table 5.2-5 Vibration Levels for Typical Construction Equipment

Equipment	PPV (in/sec) at 25 feet
Vibratory Roller	0.21
Large Bulldozer	0.089
Loaded Trucks	0.076
Jackhammer	0.035
Small Bulldozer	0.003

Sources: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

As shown in Table 5.2-5, typical construction equipment can generate vibration levels up to 0.21 in/sec PPV at 25 feet. Paving and grading activities could potentially occur at a distance of 15 feet from residential structures to the north during the proposed parking lot expansion. These activities could include construction

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equipment such as vibratory rollers. Table 5.2-5 shows that vibration levels could exceed 0.2 in/sec PPV at 25 feet or less with use of a vibratory roller, resulting in a potentially significant impact.

Level of Significance Before Mitigation: Impact 5.2-2 would be potentially significant.

5.2.5 Cumulative Impacts

Like stationary-source noise, construction noise and vibration impacts are confined to a localized area of impact. Noise from construction activities would be temporary and potentially significant. Implementation of Mitigation Measure N-1 would reduce impacts from temporary increases in construction noise to a level of less than significant. Cumulative impacts would only occur if other projects were being constructed in the vicinity of the project at the same time as the project. There are no planned or approved projects in the vicinity of the proposed school project that might add simultaneous construction noise to the project's construction noise. Therefore, project construction noise impacts would not be cumulatively considerable.

5.2.6 Level of Significance Before Mitigation

Without mitigation, the following impacts would be **potentially significant**:

- **Impact 5.2-1** Construction activities would result in temporary noise increases in the vicinity of the proposed project.
- **Impact 5.2-2** Construction activities could create excessive short-term groundborne vibration.

5.2.7 Mitigation Measures

Impact 5.2-1

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

- The project sponsor and contractors shall prepare a Construction Noise Control Plan. The details of the Construction Noise Control Plan shall be included as part of the construction drawing set.
- At least 30 days prior to the start of construction activities, all off-site residents within 300 feet of the project site shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint.

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- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the telephone numbers of the District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the District.
- During the entire active construction period, equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds), wherever feasible.
- Require the contractor to use impact tools (e.g., jack hammers and hoe rams) that are hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- During the entire active construction period, stationary noise sources shall be located as far from sensitive receptors as possible, and they shall be muffled and enclosed within temporary sheds, or insulation barriers or other measures shall be incorporated to the extent feasible.
- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.
- During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only.
- Temporary noise barriers will be constructed with solid material with a density of at least 1.5 pounds per square foot with no gaps from the ground to the top of the temporary noise barrier and be lined on the construction side with an acoustical blanket, curtain, or equivalent absorptive material. The locations and heights (8 to 16 feet) of temporary noise barriers are shown in Figure 5.2-11. The District shall verify compliance with this measure prior to the start of major demolition or construction work. Temporary Noise Barrier 1 shall remain up during the building and asphalt demolition phase and the soil nailing and grading phase but will need to be removed during the building construction phase. Temporary Noise Barrier 2 shall remain up for the entire duration of demolition and construction. Temporary Noise Barrier 3 shall remain up for at least the duration of the building and asphalt demolition phase.

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Impact 5.2-2

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

5.2.8 Level of Significance After Mitigation

Mitigated construction noise was modeled using SoundPLAN. Construction noise at nearby residential receptors was modeled at the second-story height of 15 feet, which is conservative since construction noise would be less at the residential first story due to shielding from the temporary noise barriers. The detailed results of mitigated construction noise modeling are included in Appendix 5.2-1 and displayed graphically as noise contours in Figures 5.2-12 through 5.2-16. During building and asphalt demolition (see Figure 5.2-12), mitigated noise levels could reach up to 74.2 dBA L_{eq} at Receptor 2, which would not exceed the threshold of 75 dBA L_{eq} . During soil nailing and grading (see Figures 5.2-13 through 5.2-14), mitigated construction noise levels could reach up to 70.4 dBA L_{eq} at Receptor 18, which would not exceed the threshold of 75 dBA L_{eq} . An additional model run for grading was conducted at the south end of the construction site (see Figure 5.2-15), and construction noise levels could reach up to 72.7 dBA L_{eq} at Receptor 20, which would not exceed the threshold of 75 dBA L_{eq} . During building construction (see Figure 5.2-16), construction noise levels could reach up to 74.2 dBA L_{eq} at Receptor 4, which would not exceed the threshold of 75 dBA L_{eq} .

Implementation of Mitigation Measures N-1 and N-2 would reduce project-related construction noise and vibration to a level of less than significant. Specifically, use of a static roller through implementation of Mitigation Measure N-2 is predicted to generate vibration levels of approximately 0.11 in/sec PPV at a distance of 15 feet, which would not exceed the 0.2 in/sec PPV threshold.

5.2.9 References

- California Department of Transportation (Caltrans). 2013a, September. *Technical Noise Supplement ("TeNS")*.
- . 2013b, September. *Transportation and Construction Vibration Manual*.
- Federal Highway Administration (FHWA). 2006, August. *Construction Noise Handbook*.
- Federal Transit Administration (FTA). 2018, September. *Transit Noise and Vibration Impact Assessment*.
- Harris, Cyril M. 1998. *Handbook of Acoustical Measurements and Noise Control*. 3rd edition. Woodbury, NY: Acoustical Society of America.
- San Diego, City of. 2016. *CEQA Significance Determination Thresholds*.
- San Diego Municipal Code.

Figure 5.2-11 - Temporary Noise Barriers



— Project Boundary

— 16-ft Temporary Noise Barriers

— 8-ft Temporary Noise Barrier

0 115
Scale (Feet)



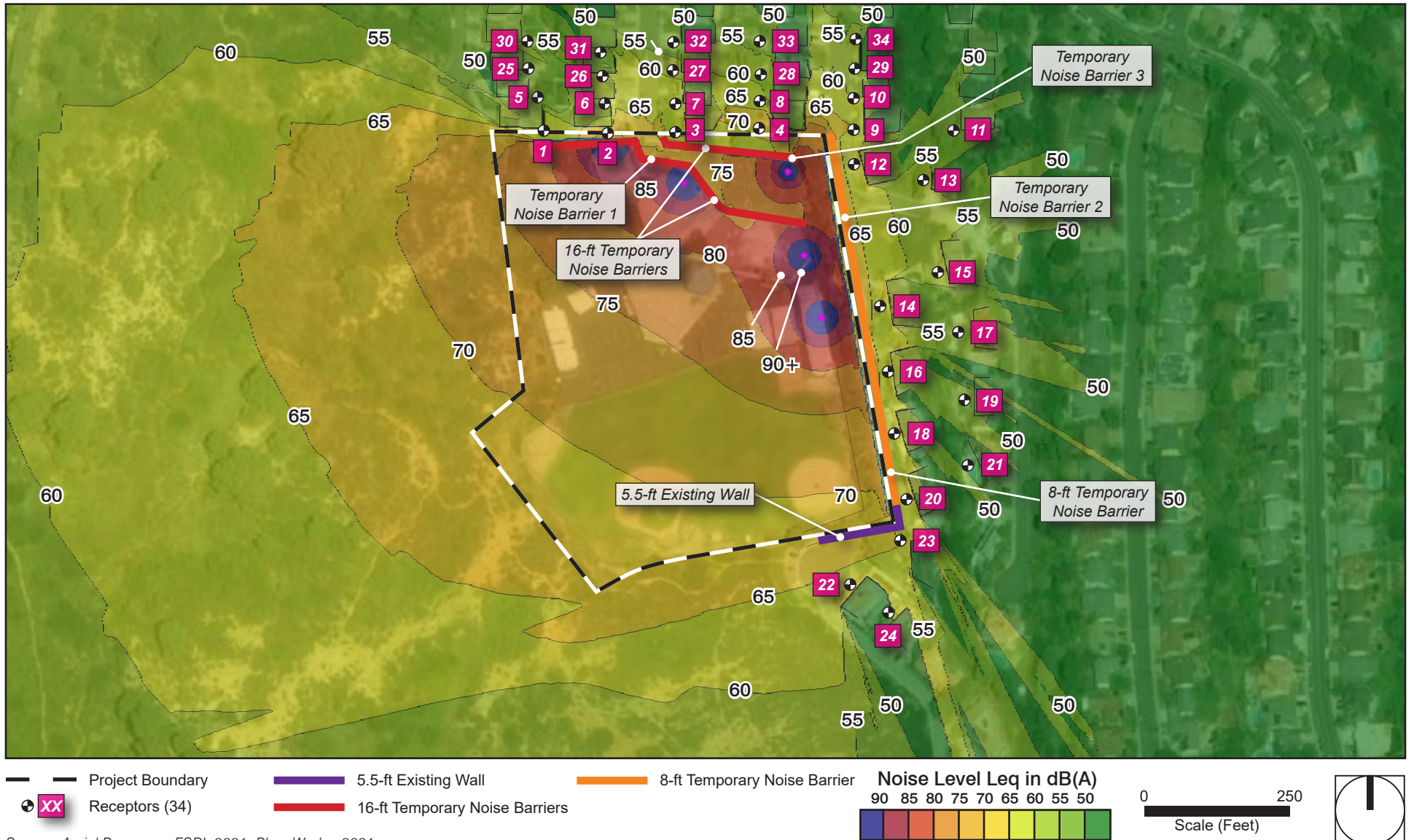
Source: Nearmap, 2021

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Figure 5.2-12 - Building and Asphalt Demolition Noise Contours (Mitigated)



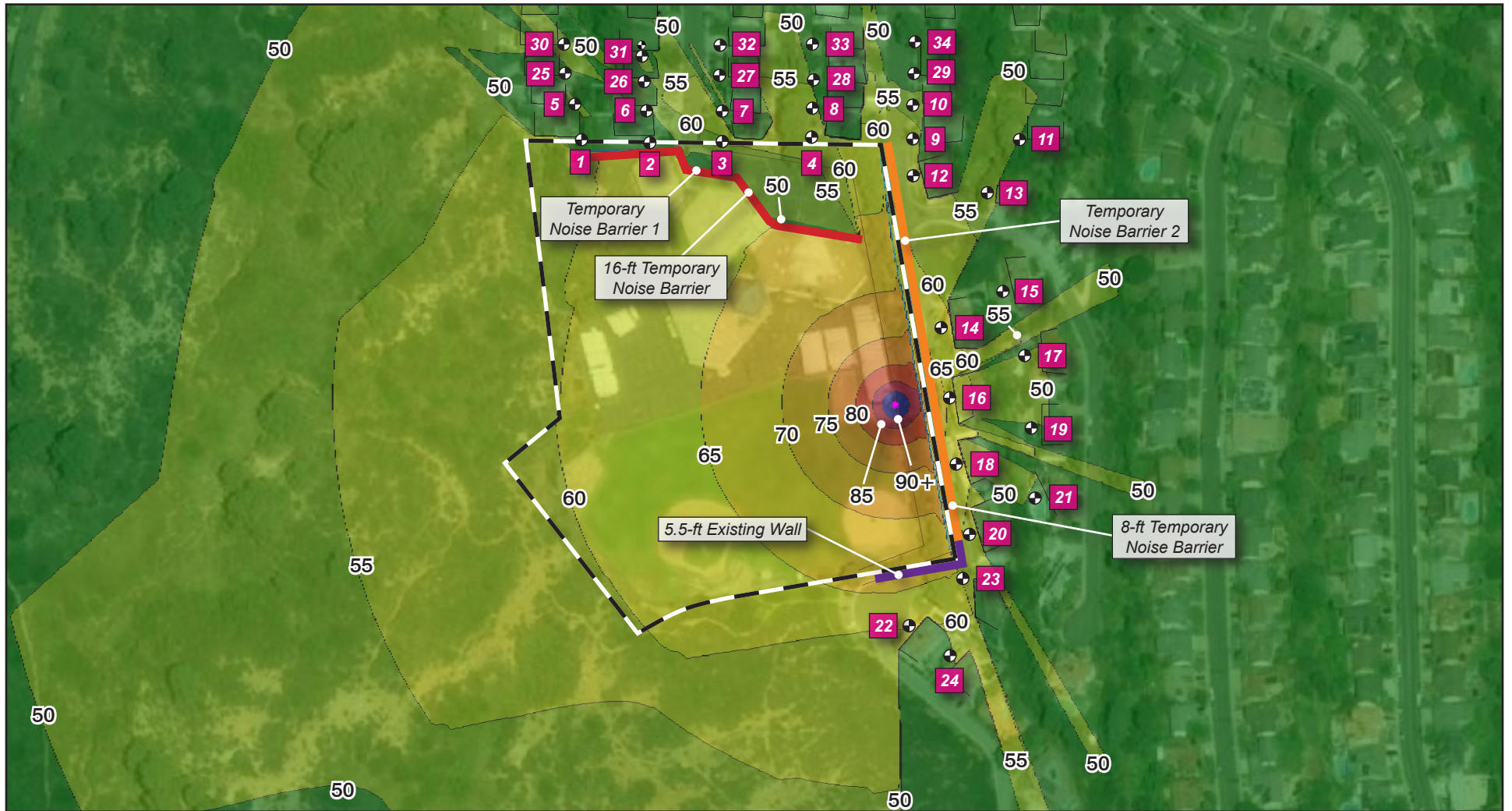
Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021

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Figure 5.2-13 - Soil Nailing and Grading South Central Noise Contours (Mitigated)



Project Boundary	5.5-ft Existing Wall	8-ft Temporary Noise Barrier	Noise Level Leq in dB(A) 90 85 80 75 70 65 60 55 50 	 Scale (Feet)	
Receptors (34)	16-ft Temporary Noise Barrier				

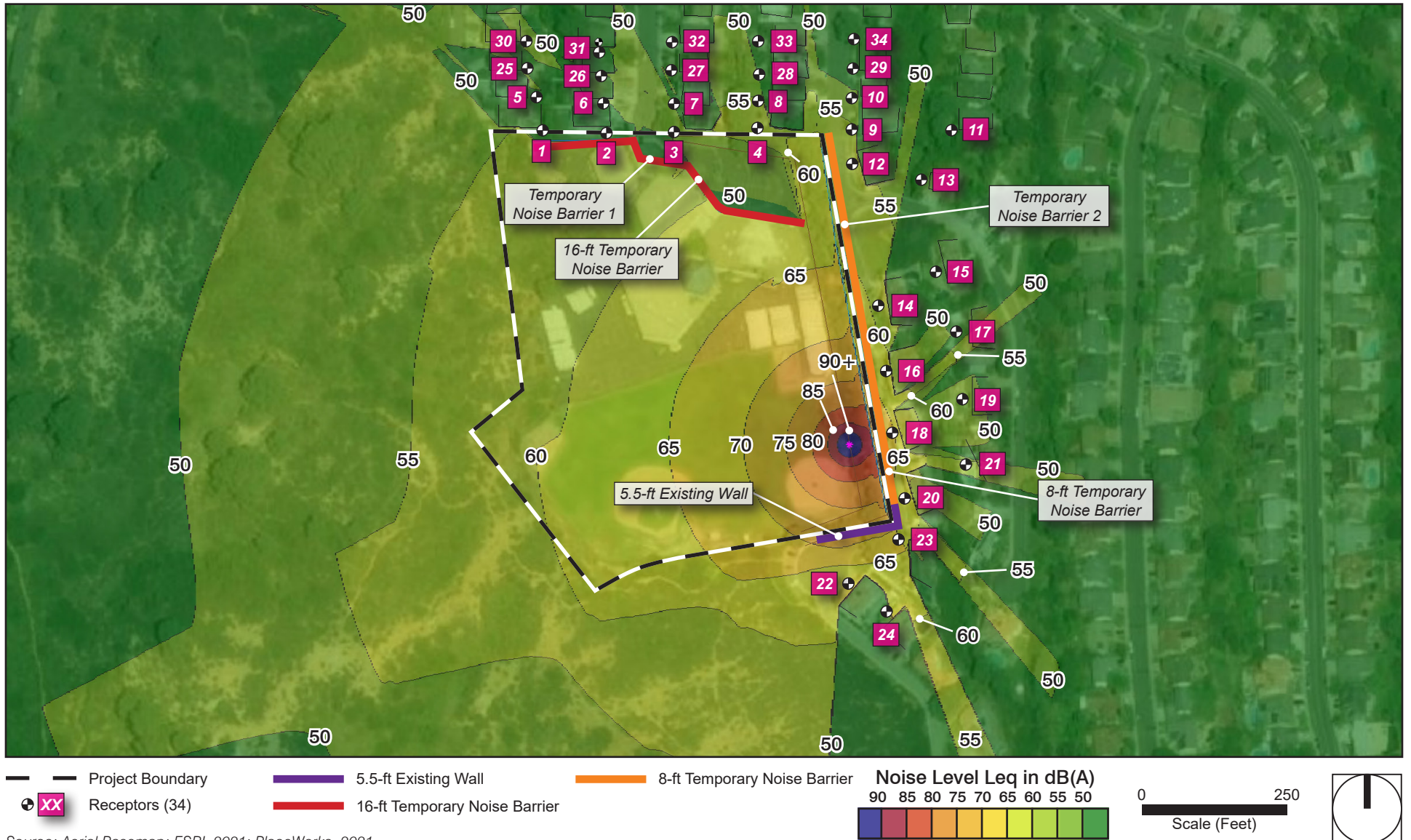
Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021

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Figure 5.2-14 - Soil Nailing and Grading South Noise Contours (Mitigated)



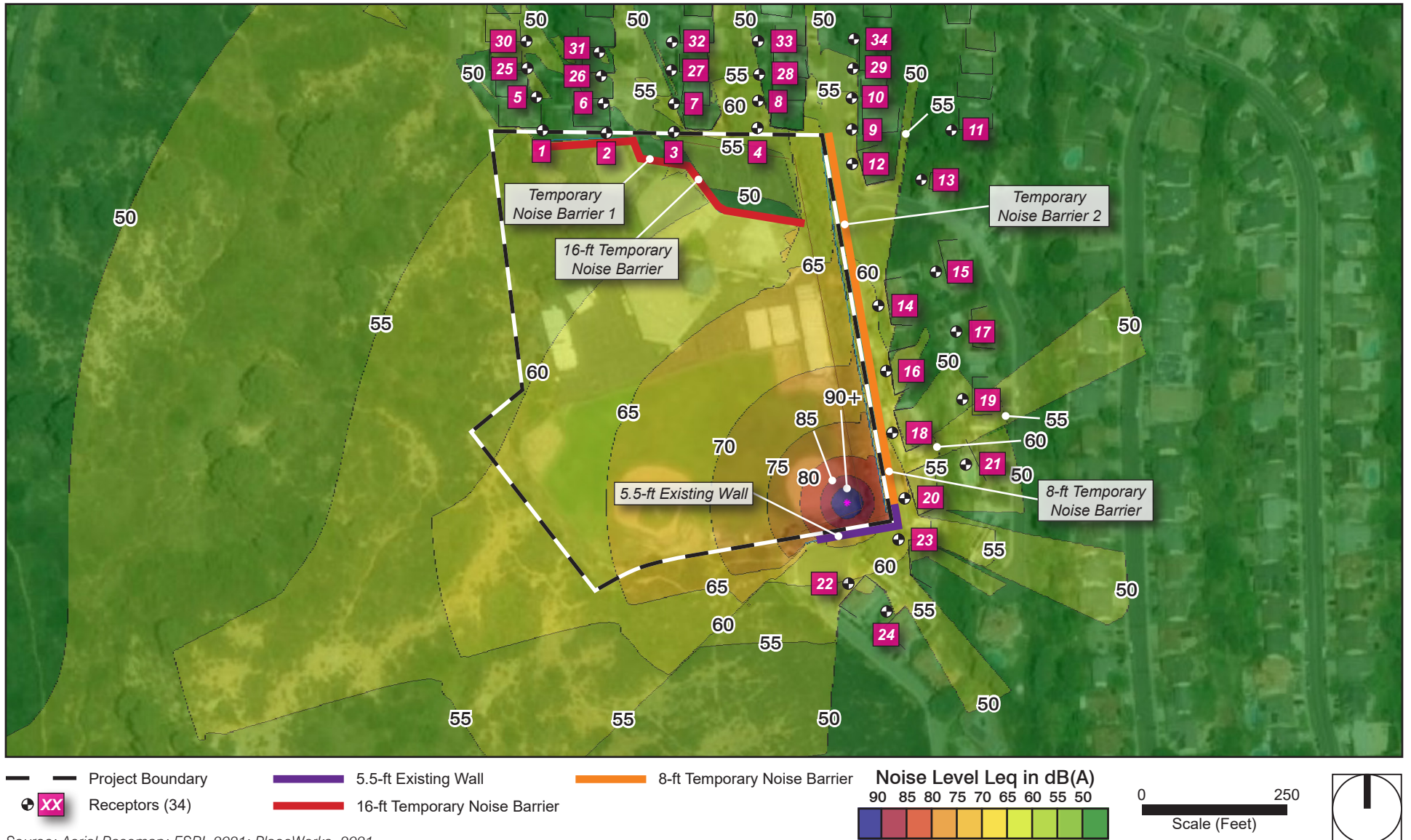
Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021

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Figure 5.2-15 - Grading South Noise Contours (Mitigated)



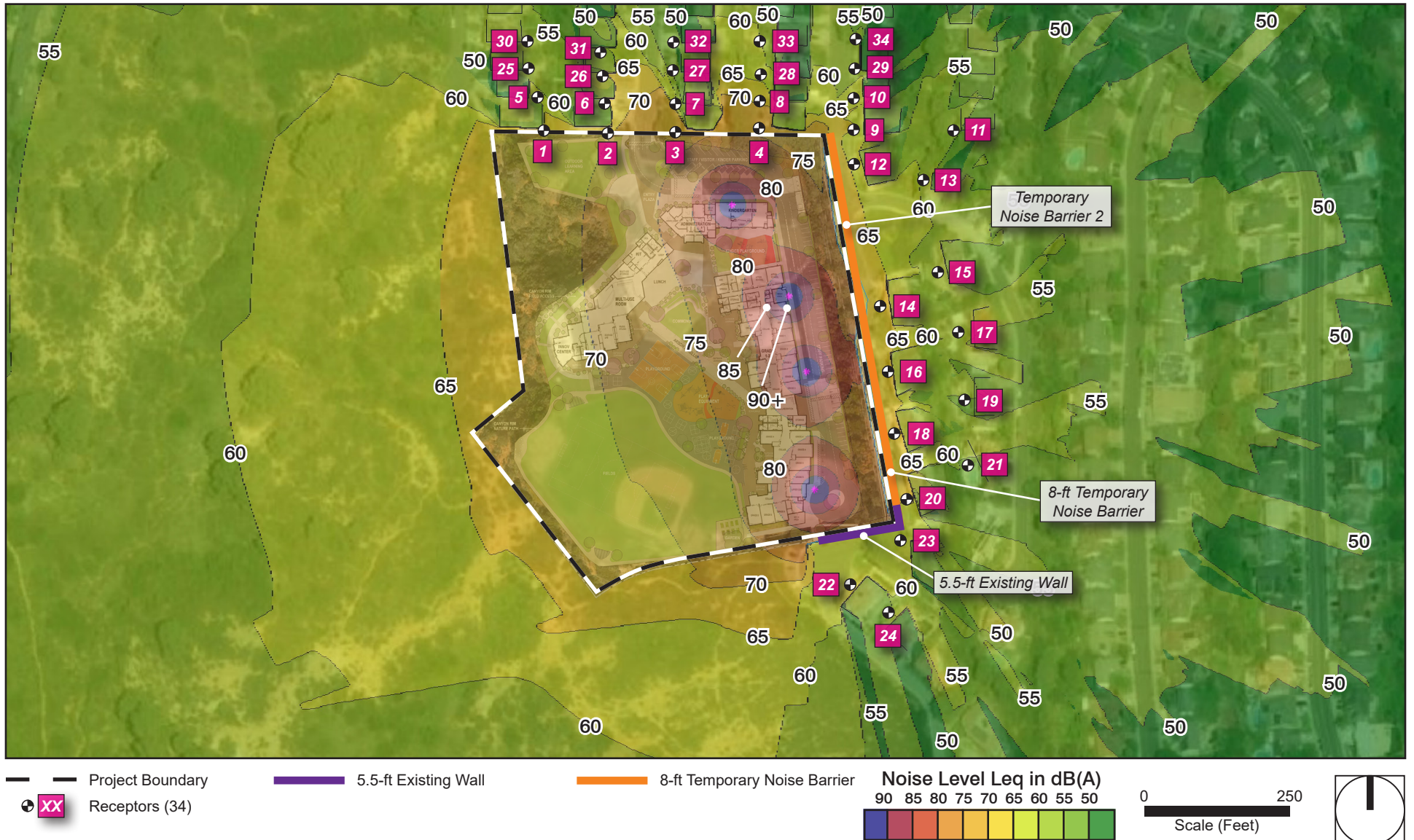
Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021

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Figure 5.2-16 - Building Construction Noise Contours (Mitigated)



Source: Aerial Basemap: ESRI, 2021; PlaceWorks, 2021; Site Plan: Baker Nowicki Design Studio, 2021

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6. Significant Unavoidable Adverse Impacts

At the end of Chapter 1, *Executive Summary*, is a table that summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. The impacts on biological resources were found to be less than significant and impacts to construction noise were found to be less than significant with mitigation.

6. Significant Unavoidable Adverse Impacts

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7. Alternatives to the Proposed Project

7.1 INTRODUCTION

7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would “feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any significant effects of the project and evaluate the comparative merits of the alternatives” (CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the proposed project.

CEQA Guidelines § 15126.6 explains the foundation and legal requirements for the alternative’s analysis in an EIR. Key provisions are:

- “[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly.” (15126.6[b])
- “The specific alternative of ‘no project’ shall also be evaluated along with its impact.” (15126.6[e][1])
- “The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the ‘no project’ alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.” (15126.6[e][2])
- “The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.” (15126.6[f])
- “Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries..., and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)” (15126.6[f][1]).

7. Alternatives to the Proposed Project

- “Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR.” (15126.6[f][2][A])
- “An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative.” (15126.6[f][3])

For each development alternative, this analysis:

- Describes the alternative.
- Analyzes the impact of the alternative as compared to the proposed project.
- Identifies the impacts of the project that would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.

According to CEQA Guidelines § 15126.6(d), “[i]f an alternative would cause...significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.”

7.1.2 Project Objectives

As described in Section 3.2, the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

- Modernize and renovate the campus to address issues identified in the Facilities Master Plan.
- Provide a safe and up-to-date campus to enhance and facilitate students’ learning environment.
- Improve circulation and reduce offsite congestion by increasing onsite parking and drop-off/pick-up zones.
- Provide the general public with updated recreational amenities, including an amphitheater, stand-alone green spaces, and a decomposed granite path.

7.1.3 Potentially Significant Impacts of the Project

A primary consideration in defining project alternatives is their potential to reduce or eliminate significant impacts and to meet most of the objectives. Pursuant to CEQA Guidelines Section 15126.6[b], alternatives to the proposed project include those that are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede attainment of the project objectives to some degree or would be more costly.

In accordance with the thresholds of significance required by CEQA, the proposed Del Mar Heights School Rebuild project was determined not to have a significant impact on biological resources and no significant

7. Alternatives to the Proposed Project

impact on construction noise with mitigation applied. Regardless, this chapter considers alternatives to the project that address the impacts found to require further assessment based on the court ruling—biological resources and noise. Therefore, although biological resources and construction noise impacts were found to be less than significant or less than significant with mitigation, this chapter explores possible alternatives to reduce impacts to biological resources and construction noise.

7.2 ALTERNATIVES CONSIDERED AND REJECTED DURING THE SCOPING/PROJECT PLANNING PROCESS

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

CEQA requires that the discussion of alternatives focus on alternatives to the project or its location that are capable of avoiding or substantially lessening any significant effects of the project. The key question and first step in the analysis is whether any of the significant effects of the project would be avoided or substantially lessened by putting the project in another location. Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR (CEQA Guidelines § 15126[5][B][1]).

7.2.1 Alternative Site

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

7.2.2 Stormwater Conveyance Alternatives

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

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

Regrading Alternative: Another alternative might be to regrade the project site so that stormwater flows north towards Boquita Drive. This would redirect stormwater, and the need for the existing outfalls would be eliminated. The existing outfalls would still require limited repair and revegetation. This alternative would involve significant earth movement to change the natural flow of stormwater, which is now to the west and

7. Alternatives to the Proposed Project

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

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

7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following two alternatives have been determined to represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives of the project and may avoid or substantially lessen any of the significant effects of the project or ameliorate community concerns. The following alternatives are analyzed in detail in the following sections.

- No Project
- Campus Modernization

7. Alternatives to the Proposed Project

An EIR must also identify an “environmentally superior” alternative, and where the No Project Alternative is identified as environmentally superior, the EIR must identify an environmentally superior alternative from the others evaluated. Each alternative’s environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. Only impacts found significant and unavoidable are typically used in making the determination of whether an alternative is environmentally superior, similar, or inferior to the proposed project. Section 7.5, *Environmentally Superior Alternative*, identifies the alternative that was determined to be environmentally superior. The proposed project is analyzed in detail in Chapter 5 and Chapter 8 of this focused DEIR.

7.3.1 No Project Alternative

The CEQA Guidelines require the analysis of a No Project Alternative. This analysis must discuss the existing site conditions as well as what would be reasonably expected in the foreseeable future based on any current plans if the project were not approved.

This discussion compares the environmental effects of the campus and school program remaining in their existing condition against the environmental effects if the project were approved. Under the No Project Alternative, Del Mar Heights School would not be rebuilt; the students would return to a campus that needs extensive replacement of plumbing, roofing, and HVAC system; and the stormwater outfall drainages would continue to deteriorate, resulting in further erosion and loss of habitat. No changes to the existing drop-off/pick-up zones would occur.

7.3.2 Campus Modernization Alternative

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

7.4 ALTERNATIVES TO THE PROJECT

7.4.1 No Project Alternative

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

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

7. Alternatives to the Proposed Project

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

7.4.1.1 ABILITY TO REDUCE ENVIRONMENTAL IMPACTS

Biological Resources

The school campus supports a single sensitive plant community: Southern Maritime Chaparral (0.8 acre). Non-sensitive disturbed land (0.5 acre), ornamental (1.4 acres), and developed land (8.6 acres) also occur within the campus. There are two stormwater outfalls, on southern and western slopes of the campus. These outfalls are not working properly and are causing significant erosion within the sensitive Southern Maritime Chaparral. Stormwater drainage would be treated via three bioretention basins before exiting the outfalls and outfalls would be repaired and revegetated with a mix of native species under the proposed project, and the biological resources impacts, were found to be less than significant under the proposed project. Under the No Project Alternative, no repairs to these outfalls would occur, and erosion would continue to worsen. Therefore, without these improvements to the existing outfalls, this alternative would be environmentally inferior.

Noise

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

7.4.1.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

The No Project Alternative would not meet any of the below project objectives because no substantial improvements or new building construction would occur on campus.

- Modernize and renovate the campus to address issues identified in the Facilities Master Plan.
- Provide a safe and up-to-date campus to enhance and facilitate students' learning environment.
- Improve circulation and reduce offsite congestion by increasing onsite parking and drop-off/pick-up zones.
- Provide the general public with updated recreational amenities including an amphitheater, standalone green spaces, and a decomposed granite path.

7. Alternatives to the Proposed Project

7.4.1.3 CONCLUSION

Overall, this Alternative would be environmentally inferior for biological resources, and would be superior (reduce effects) for noise, when compared to the proposed project. This Alternative would not meet any of the project objectives and it is not needed to reduce significant, unavoidable impacts.

7.4.2 Campus Modernization Alternative

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

7.4.2.1 ABILITY TO REDUCE ENVIRONMENTAL IMPACTS

Biological Resources

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

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

Noise

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

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

7. Alternatives to the Proposed Project

7.4.2.2 ABILITY TO ACHIEVE PROJECT OBJECTIVES

The following reviews the Campus Modernization Alternative's ability to achieve project objectives.

■ **Modernize and renovate the campus to address issues identified in the Facilities Master Plan:**

The Facilities Master Plan (FMP) was adopted to support a modern educational program and facilities were re-envisioned to provide students with safe, healthy, and technologically advanced learning environments. The specific "design drivers" behind the proposed project, based on feedback from the Community Design Symposium, include the following:

- **Site**
 - Reduce Vehicle Congestion
 - Improve Pedestrian Safety
 - Maximize On-Site Vehicle Queuing
 - Maximize Parking
 - Respect Neighborhood Views
 - Emergency Vehicle Access
 - Outdoor Learning Spaces, Outdoor Play Areas and Fields
- **Building**
 - Campus Interconnection
 - Flexibility/Adaptability
 - Indoor/Outdoor
 - Collaboration and Transparency
 - Natural Light and Fresh Air
 - Access to Views
 - Flexible Technology

The layout of the existing campus and characteristics of the existing buildings do not support the educational programs proposed by the Board of Trustees. The Campus Modernization Alternative would upgrade various systems, but it is not possible to satisfy the design parameters through a modernization program. The existing campus is beyond its useful life, and this alternative would not address issues identified in the FMP and Community Design Symposium, and therefore would not achieve the District's project objective.

■ **Provide a safe and up-to-date campus to enhance and facilitate students' learning environment:**

The Campus Modernization Alternative would not expand the existing parking lot or extend the campus drop-off zone, and the traffic congestion within the adjoining neighborhood would continue. The cars parked on the adjacent roads and the drop-offs that occur there create a hazard for students walking or biking to school. This hazardous condition would remain under the Campus Modernization Alternative, and this project objective would not be achieved.

7. Alternatives to the Proposed Project

- **Improve circulation and reduce offsite congestion by increasing onsite parking and drop-off/pick-up zones:** The Campus Modernization Alternative would not expand the existing parking lot or extend the campus drop-off zone, and the traffic congestion within the adjoining neighborhood would continue. The cars parked on the adjacent roads and the drop-offs that occur there create a hazard for students walking or biking to school. This hazardous condition would remain under the Campus Modernization Alternative, and this project objective would not be achieved.
- **Provide the general public with updated recreational amenities including an amphitheater, stand-alone green spaces, and a decomposed granite path:** While the proposed plan reduces green space to gain educational space and reduce traffic hazards, the proposed plan continues to provide significant outdoor play areas and open community-accessible space. The Campus Modernization Alternative would not provide the amphitheater and certain other proposed enhancements, but it would retain and resurface the existing facilities. This alternative would provide updated recreational amenities to the general public, but this project objective would not be fully achieved.

7.4.2.3 CONCLUSION

Compared to the proposed project, the Campus Modernization Alternative is environmentally neutral for biological resources, and superior for construction noise

The Campus Modernization Alternative would partially meet only one of the project objectives; therefore, it is inferior to the proposed project as it relates to achieving the District's project objectives.

7.5 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

As required by CEQA Guidelines Section 15126.6, an EIR must identify an “environmentally superior alternative,” which would be the alternative that has the least impact on the environment or would be capable of avoiding or substantially reducing any significant impacts of the project. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, similar, or inferior. The Alternative that results in the least impact, considering both number of impacts and the scale of impacts, is the environmentally superior alternative. Table 7-1, *Project Alternatives Matrix*, shows a summary of the project alternatives and comparison to the proposed project. Alternative 2, Campus Modernization Alternative, has been identified as the environmentally superior alternative as it would have similar biological resources impacts as the proposed project and would result in reduced construction noise impacts. Additionally, Alternative 2, Campus Modernization, would not result in benefits to the environment related to the project's reduction of carbon dioxide due to better-functioning infrastructure, use of natural light and air, updated utilities, and technology, and so forth. Table 2, *Ability of Project Alternatives to Meet the Project Objectives*, summarizes the ability of the proposed project and the project alternatives to achieve project objectives.

7. Alternatives to the Proposed Project

Table 7-1 Project Alternatives Matrix

Environmental Topic	Alternative 1. No Project	Alternative 2. Campus Modernization
Biological Resources	-1	0
Noise	+1	+1
TOTAL	0	+1

Notes: Proposed project does not have any significant and unavoidable environmental impacts.

(+1) = Impact considered superior when compared with the proposed project.

(0) = Impact considered similar to the proposed project.

(-1) = Impact considered inferior when compared with the proposed project.

Table 7-2 Ability of Project Alternatives to Meet the Project Objectives

Project Objectives	Proposed Project	Alternative 1 No Project	Alternative 2 Campus Modernization
Modernize and renovate the campus to address issues identified in the Facilities Master Plan.	Yes	No	No
Provide a safe and up-to-date campus to enhance and facilitate students' learning environment.	Yes	No	No
Improve circulation and reduce offsite congestion by increasing onsite parking and drop-off/pick-up zones.	Yes	No	No
Provide the general public with updated recreational amenities including an amphitheater, standalone green spaces, and a decomposed granite path.	Yes	No	Partially

8. Impacts Found Not to Be Significant

California Public Resources Code Section 21003 (f) states: "...it is the policy of the state that...[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." This policy is reflected in the California Environmental Quality Act (CEQA) Guidelines (Guidelines) Section 15126.2(a), which states that "[a]n EIR [environmental impact report] shall identify and focus on the significant environmental impacts of the proposed project" and Section 15143, which states that "[t]he EIR shall focus on the significant effects on the environment." Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the Draft EIR.

Table 8-1, *Impacts Previously Addressed in the IS/MND*, lists all the impacts that were found to be less than significant or less than significant with mitigation incorporated, based on the analysis in the Initial Study/Mitigated Negative Declaration (see Appendix 1-1), with the exception of the impacts that required further assessment as a result of the court ruling. The following sections provide the environmental impact and the determination based on the Initial Study. Threshold letters correspond to the lettering in Appendix G of the CEQA Guidelines.

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Previously Addressed in IS/MND

Environmental Issues	Initial Study Determination
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:	
a) Have a substantial adverse effect on a scenic vista?	Less Than Significant Impact.
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	No Impact.
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Less Than Significant Impact.
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	Less Than Significant Impact.
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:	
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	No Impact.
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	No Impact.
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	No Impact.
d) Result in the loss of forest land or conversion of forest land to non-forest use?	No Impact.
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	No Impact.
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:	
a) Conflict with or obstruct implementation of the applicable air quality plan?	Less Than Significant Impact.
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality?	Less Than Significant Impact.
c) Expose sensitive receptors to substantial pollutant concentrations?	Less Than Significant Impact.
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	Less Than Significant Impact.
IV. BIOLOGICAL RESOURCES. Would the project:	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	No Impact.
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	No Impact.

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Previously Addressed in IS/MND

Environmental Issues	Initial Study Determination
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	Less Than Significant Impact.
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	No Impact.
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	No Impact.
V. CULTURAL RESOURCES. Would the project:	
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	No Impact.
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	<p>Less Than Significant Impact with Mitigation Incorporated.</p> <p>CUL-1 Prior to issuance of grading permits, a qualified archaeological monitor shall be identified to be on call during ground-disturbing activities. If archeological resources are discovered during excavation and/or construction activities, construction shall stop within 25 feet of the find and the qualified archaeologist shall be consulted to determine whether the resource requires further study. The archaeologist shall make recommendations to the District to protect the discovered resources. Archaeological resources recovered shall be provided to the South Central Coastal Information Center and San Diego Natural History Museum, or any other local museum or repository willing and able to accept and house the resource to preserve for future scientific study.</p>
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	Less Than Significant Impact.
VI. ENERGY. Would the project:	
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less Than Significant Impact.
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	No Impact.
VII. GEOLOGY AND SOILS. Would the project:	
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:	Less Than Significant Impact.
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	
ii) Strong seismic ground shaking?	
iii) Seismic-related ground failure, including liquefaction?	
iv) Landslides?	
b) Result in substantial soil erosion or the loss of topsoil?	Less Than Significant Impact.

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Previously Addressed in IS/MND

Environmental Issues	Initial Study Determination
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Less Than Significant Impact.
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	Less Than Significant Impact.
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact.
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<p>Less Than Significant with Mitigation Incorporated.</p> <p>GEO-1 Prior to construction, a field survey for paleontological resources shall be conducted by a qualified paleontologist. If unique paleontologist resources are not discovered during the field survey, then excavation and/or construction activities can commence. If unique paleontological resources are discovered during excavation and/or construction activities, construction shall stop within 25 feet of the find, and the qualified paleontologist shall be consulted to determine whether the resource requires further study. The paleontologist shall make recommendations to the District to protect the discovered resources. Any paleontological resources recovered shall be provided to the South Central Coastal Information Center and San Diego Natural History Museum, or repository willing and able to accept and house the resource to preserve for future scientific study.</p>
VIII. GREENHOUSE GAS EMISSIONS. Would the project:	
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Less Than Significant Impact.
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	No Impact.
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:	
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Less Than Significant Impact.
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Less Than Significant Impact.
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	No Impact.
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less Than Significant Impact.
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	No Impact.

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Previously Addressed in IS/MND

Environmental Issues	Initial Study Determination
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Less Than Significant Impact.
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Less Than Significant Impact.
X. HYDROLOGY AND WATER QUALITY. Would the project:	
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	Less Than Significant Impact.
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less Than Significant Impact.
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:	
i) result in a substantial erosion or siltation on- or off-site;	Less Than Significant Impact.
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	Less Than Significant Impact.
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	Less Than Significant Impact.
iv) impede or redirect flood flows?	Less Than Significant Impact.
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Less Than Significant Impact.
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Less Than Significant Impact.
XI. LAND USE AND PLANNING. Would the project:	
a) Physically divide an established community?	No Impact.
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Less Than Significant Impact.
XII. MINERAL RESOURCES. Would the project:	
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	No Impact.
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	No Impact.
XIII. NOISE. Would the project result in:	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	No Impact.
XIV. POPULATION AND HOUSING. Would the project:	
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	No Impact.
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact.

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Previously Addressed in IS/MND

Environmental Issues	Initial Study Determination
XV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:	
a) Fire protection?	Less Than Significant Impact.
b) Police protection?	Less Than Significant Impact.
c) Schools?	No Impact.
d) Parks?	Less Than Significant Impact.
e) Other public facilities?	No Impact.
XVI. RECREATION.	
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less Than Significant Impact.
b) Does the project recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Less Than Significant Impact.
XVII. TRANSPORTATION. Would the project:	
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	Less Than Significant Impact. <i>The ADA-compliant ramp and stairs proposed under the original plan have been removed from the project. The potential that traffic would increase on Mira Montana Drive from its possible use as a student drop-off/pick-up zone is eliminated by the removal of the ramp and stairs. Therefore, this impact does not require further analysis in the DEIR.</i>
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	No Impact.
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	No Impact.
d) Result in inadequate emergency access?	No Impact.
XVIII. TRIBAL CULTURAL RESOURCES. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	No Impact.

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Previously Addressed in IS/MND

Environmental Issues	Initial Study Determination
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Less Than Significant Impact with Mitigation Incorporated. CUL-1 Prior to issuance of grading permits, a qualified archaeological monitor shall be identified to be on call during ground-disturbing activities. If archeological resources are discovered during excavation and/or construction activities, construction shall stop within 25 feet of the find and the qualified archaeologist shall be consulted to determine whether the resource requires further study. The archaeologist shall make recommendations to the District to protect the discovered resources. Archaeological resources recovered shall be provided to the South Central Coastal Information Center and San Diego Natural History Museum, or any other local museum or repository willing and able to accept and house the resource to preserve for future scientific study.

Note: In accordance with the requirements of Assembly Bill (AB) 52, the City of San Diego sent notification to the Native American Tribes traditionally and culturally affiliated with the project area on September 9, 2020. The Lipay Nation of Santa Ysabel, and the Jamul Indian Village of California concurred with the mitigation to require monitoring and ensuring a Native American Monitor is present as standard with City mitigation. The San Pasqual Band of Mission Indians Tribal consultation concurred with the mitigation to require monitoring and ensuring a Native American Monitor is present and concluded consultation. Mitigation in the form of archaeological and Native American monitoring would reduce all impacts to Tribal Cultural Resources to below a level of significance (Mitigation Measure CUL-01).

Based on the foregoing analysis and information, there is no evidence that the project would require a major change to the Mitigated Negative Declaration. The project would not result in any new significant impact, nor would a substantial increase in the severity of impacts from that described in the Mitigated Negative Declaration result.

XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	Less Than Significant Impact.
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less Than Significant Impact.
c) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	Less Than Significant Impact.
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Less Than Significant Impact.
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Less Than Significant Impact.

XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Less Than Significant Impact.
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Less Than Significant Impact.

8. Impacts Found Not to Be Significant

Table 8-1 Impacts Previously Addressed in IS/MND

Environmental Issues	Initial Study Determination
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	Less Than Significant Impact.
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Less Than Significant Impact.

9. Significant Irreversible Changes Due to the Proposed Project

Section 15126.2(c) of the CEQA Guidelines requires that an Environmental Impact Report (EIR) describe any significant irreversible environmental changes that would be caused by the proposed project should it be implemented. Specifically, the CEQA Guidelines state:

Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highways improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

The following are the significant irreversible changes that would be caused by the proposed project, should it be implemented:

- Implementation of the proposed Del Mar Heights School Rebuild project would include construction activities that would entail the commitment of nonrenewable and/or slowly renewable resources; human resources; and natural resources such timber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, water, and fossil fuels.
- Operation of the proposed project would require continued use of natural gas and electricity, petroleum-based fuels, fossil fuels, and water, similar to existing school operations.
- Operation of the proposed improvements would require a continued commitment of social services and public maintenance services (e.g., police, fire, and sewer and water services), similar to that existing for the school's current operations.

The commitment of resources required for the rebuild and continued operation of the site as an elementary school would limit the availability of resources for future generations or for other uses during the life of the project.

9. Significant Irreversible Changes Due to the Proposed Project

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10. Growth-Inducing Impacts of the Proposed Project

Pursuant to Sections 15126(d) and 15126.2(d) of the CEQA Guidelines, this section is provided to examine ways in which the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Also required is an assessment of other projects that would foster other activities which could affect the environment, individually or cumulatively. To address this issue, potential growth-inducing effects will be examined through analysis of the following questions:

- Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?
- Would this project result in the need to expand one or more public services to maintain desired levels of service?
- Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?
- Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

Please note that growth-inducing effects are not to be construed as necessarily beneficial, detrimental, or of little significance to the environment. This issue is presented to provide additional information on ways in which this project could contribute to significant changes in the environment, beyond the direct consequences of developing the land use concept examined in the preceding sections of this EIR.

Would this project remove obstacles to growth, e.g., through the construction or extension of major infrastructure facilities that do not presently exist in the project area, or through changes in existing regulations pertaining to land development?

The proposed Del Mar Heights School rebuild project is the rebuild and upgrade of an existing school campus with similar facilities for continued use of the site as a school that serves the surrounding community. The project site is in an urban area served by existing infrastructure, including water and sewer mains and electricity and natural gas services. The improvements would affect the existing school site and would not remove obstacles to growth or affect population growth.

10. Growth-Inducing Impacts of the Proposed Project

Would this project result in the need to expand one or more public services to maintain desired levels of service?

The proposed project would improve and reconstruct an existing school campus with similar uses. It is not growth inducing, and the proposed project would reduce enrollment capacity by one classroom (approximately 24 students). Therefore, the proposed project would not result in the need for additional public government services or expanded utility infrastructure; see Section 8.7, *Public Services*, and Section 8.8, *Utilities and Service Systems*, of Chapter 8.

Would this project encourage or facilitate economic effects that could result in other activities that could significantly affect the environment?

Construction of the proposed project would generate short-term employment, which would be absorbed from the regional labor force and would not attract new workers to the region. Operation of the project would not decrease total employment at the District as a result of the decrease in enrollment capacity (1 classroom/24 seats).

Would approval of this project involve some precedent-setting action that could encourage and facilitate other activities that could significantly affect the environment?

The need for the project is to improve facilities at the Del Mar Heights School campus to maintain and enhance the District's educational goals and programs. District approval would not set a precedent that could encourage and facilitate local and regional activities and government actions that could significantly affect the environment. School enhancement, and rebuild projects and programs are common statewide and nationwide.

11. Organizations and Persons Consulted

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City of San Diego

Heidi Vonblum, Deputy Director, Planning Department

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11. Organizations and Persons Consulted

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12. Qualifications of Persons Preparing EIR

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12. Qualifications of Persons Preparing EIR

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