O'Farrell Charter School
Whole Site Modernization

Initial Study / Mitigated Negative Declaration

Prepared for
San Diego Unified School District

February 2021

San Diego Unified
SCHOOL DISTRICT

ESA

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ACRONYMS

ADA	Americans with Disabilities Act
ALUCP	Airport Land Use Compatibility Plan
BMPs	Best Management Practices
CalEEMod	California Emissions Estimator Model
CAL FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
Cal/OSHA	California Division of Occupational Safety and Health
CAPCOA	California Air Pollution Control Officers Association
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CEQA	California Environmental Quality Act
CH_4	Methane
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CRHR	California Register of Historic Resources
DTSC	Department of Toxic Substances Control
EIR	Environmental Impact Report
EO	Executive Order
EPA	Environmental Protection Agency
FEMA	Federal Emergency Management Agency
GHG	greenhouse gases
GWh	Gigawatt hours
HRA	Health Risk Assessment
HVAC	Heating/Ventilating/Air Conditioning
I	Interstate
IS	Initial Study

LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
MTCO2E	metric tons of carbon dioxide equivalent
MND	Mitigated Negative Declaration
MRZ	Mineral Resource Zone
NAHC	Native American Heritage Commission
NHTSA	National Highway Traffic Safety Administration
N_2O	Nitrous Oxide
O_3	ozone
PM	Particulate Matter
PM_{10}	particulate matter with an aerodynamic diameter of 10 micrometers or less
$PM_{2.5}$	particulate matter with an aerodynamic diameter of 2.5 micrometers or less
PRC	Public Resources Code
RAQS	Regional Air Quality Strategies
SANDAG	San Diego Association of Governments
SCIC	South Coastal Information Center
SDAB	San Diego Air Basin
SDAPCD	San Diego Air Pollution Control District
SDG&E	San Diego Gas and Electric
SLF	Sacred Lands File
SR	State Route
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
VHFHSZ	Very High Fire Hazard Severity Zones
VMT	Vehicle Miles Traveled

CHAPTER 1
Introduction

1.1 Overview

The San Diego Unified School District (District), as the lead agency under the California Environmental Quality Act (CEQA), has prepared this Initial Study/Mitigated Negative Declaration (MND) to evaluate the potential environmental impacts associated with the O'Farrell Charter School Whole Site Modernization Project (Proposed Project). The Proposed Project would involve repair, renovation, and revitalization of parts of the existing O'Farrell Charter School. Primary improvements, which are described in detail below, would include construction of a new student union building, an improved outdoor gathering space with an outdoor amphitheater, a new building for concessions and restrooms, and a new turf field in the center of campus. Security fencing, drainage improvements, parking circulation enhancements would be installed. In addition, the Proposed Project would modernize several other existing buildings on campus with new flooring, roofing, and interior lighting. The Proposed Project would not create additional capacity that would increase the amount of students or staff present at O'Farrell Charter School, but rather would provide infrastructure improvements to serve the existing student body. As part of the District's discretionary review process, the Proposed Project is required to undergo an environmental review in accordance with CEQA.

1.2 CEQA Requirements

Approval of the Proposed Project is a discretionary action and is therefore subject to the requirements of CEQA (Public Resources Code [PRC], Division 13, Sections 21000–21177) and the State CEQA Guidelines (California Code of Regulations [CCR], Title 14, Sections 15000–15387). Initial Studies/Environmental Checklist Forms such as this document are typically used as a basis for deciding whether to prepare an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) for a project, pursuant to CEQA.

An Initial Study/Environmental Checklist Form is intended to satisfy the requirements of CEQA (PRC Division 13, Sections 21000-21177) and the State CEQA Guidelines (14 CCR 15000-15387). CEQA encourages lead agencies and applicants to modify their projects to avoid significant adverse impacts. Per CEQA (14 CCR 15070), an MND may be prepared for a project subject to CEQA when an Initial Study has identified potentially significant impacts on the environment, but revisions have been made or mitigation has been added so that no significant impacts on the environment would result from project implementation. Based on the findings of the Initial Study, the District has determined that preparation of an MND is the appropriate method to present environmental review of the Proposed Project in compliance with CEQA.

1.3 Terminology

The following terms are used to describe the level of significance of impacts.

- A finding of *no impact* is used if the analysis concludes that a project would not affect the particular topic area in any way.
- An impact is considered *less than significant* if the analysis concludes that a project would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered *less than significant with mitigation incorporated* if the analysis concludes that a project would cause no substantial adverse change to the environment provided that environmental commitments or other enforceable measures are included as part of the Proposed Project.
- An impact is considered *potentially significant* if the analysis concludes that a project could have a substantial adverse effect on the environment.

1.4 Initial Study Organization

The content and format of this report are designed to meet the requirements of CEQA. This Initial Study/MND identifies the potential environmental impacts of the Proposed Project to support the decision to prepare an MND. The report contains the following sections.

- **Chapter 1, Introduction,** identifies the purpose and scope of the Initial Study/MND.
- **Chapter 2, Project Description,** identities the location and environmental setting of the Project Site and describes the Proposed Project in detail.
- **Chapter 3, Environmental Checklist,** presents the checklist responses for each resource topic. This section identifies the potential impacts of implementing the Proposed Project, and identifies all references and individuals cited in this Initial Study/MND.

CHAPTER 2
Project Description

2.1 Project Background

This chapter provides a description of the proposed O'Farrell Charter School Whole Site Modernization Project (Proposed Project), which provides a basis for the environmental analysis contained in this Initial Study/MND. The Proposed Project involves improvements to the existing O'Farrell Charter School (Project Site or campus), including construction of a new student union building and outdoor gathering space. The Project would also include new student drop-off areas and parking lot improvements. In addition, the Proposed Project would modernize several other buildings on campus with new flooring, roofing, and interior lighting.

O'Farrell Charter School is one of few transitional kindergarten (TK) through twelfth grade schools within the District, and has experienced growing demand over recent years. Historically O'Farrell Charter School operated as a very large middle school and elementary school (previously known as the O'Farrell Community School) on the western portion of campus, until it added a high school on the eastern portion of campus. As of October 2020, the school served approximately 1,932 students serving grades TK-12. Specifically, the school served 537 students in grades K-5, 816 students in grades 6-8, and 579 students in grades 9-12. In July 2020, the school had requested an increase in enrollment to the District Board of Education. On July 28, 2020, the District Board of Education denied revisions to the school's charter that would have allowed for an increase in its enrollment (District 2020a). The approved enrollment for the school through 2023/2024 is 1,835 students. For the purpose of this analysis, the operational capacity of the school is also 1,835 students.

While a capacity and enrollment increase has not been approved by the District Board of Education, additional improvements to serve the existing student population are needed. As such, school modernization improvements included as part of the Proposed Project would not serve to increase the enrollment of students or staff present on site, but would rather provide infrastructure improvements for the existing student body. While the number of classrooms would increase on campus, the total number of students would not exceed its previously approved enrollment/capacity amount of 1,835 identified above.

2.2 Environmental Setting

2.2.1 Project Location

O'Farrell Charter School is located at 6130 Skyline Drive in the Encanto Neighborhoods community, in the southern portion of the city of San Diego. Encanto is located east of the community of Southeastern San Diego, west of the community of Skyline-Paradise Hills and the city of Lemon Grove, south of the community of Mid-City: Eastern Area, and north of the city of National City. As shown in **Figure 1**, the Project Site is located approximately 1.6 miles east of Interstate (I-) 805 and approximately 1.3 miles southeast of State Route (SR) 94. Local access is provided by Skyline Drive to the south, Imperial Avenue to the north, and Valencia Parkway to the west.

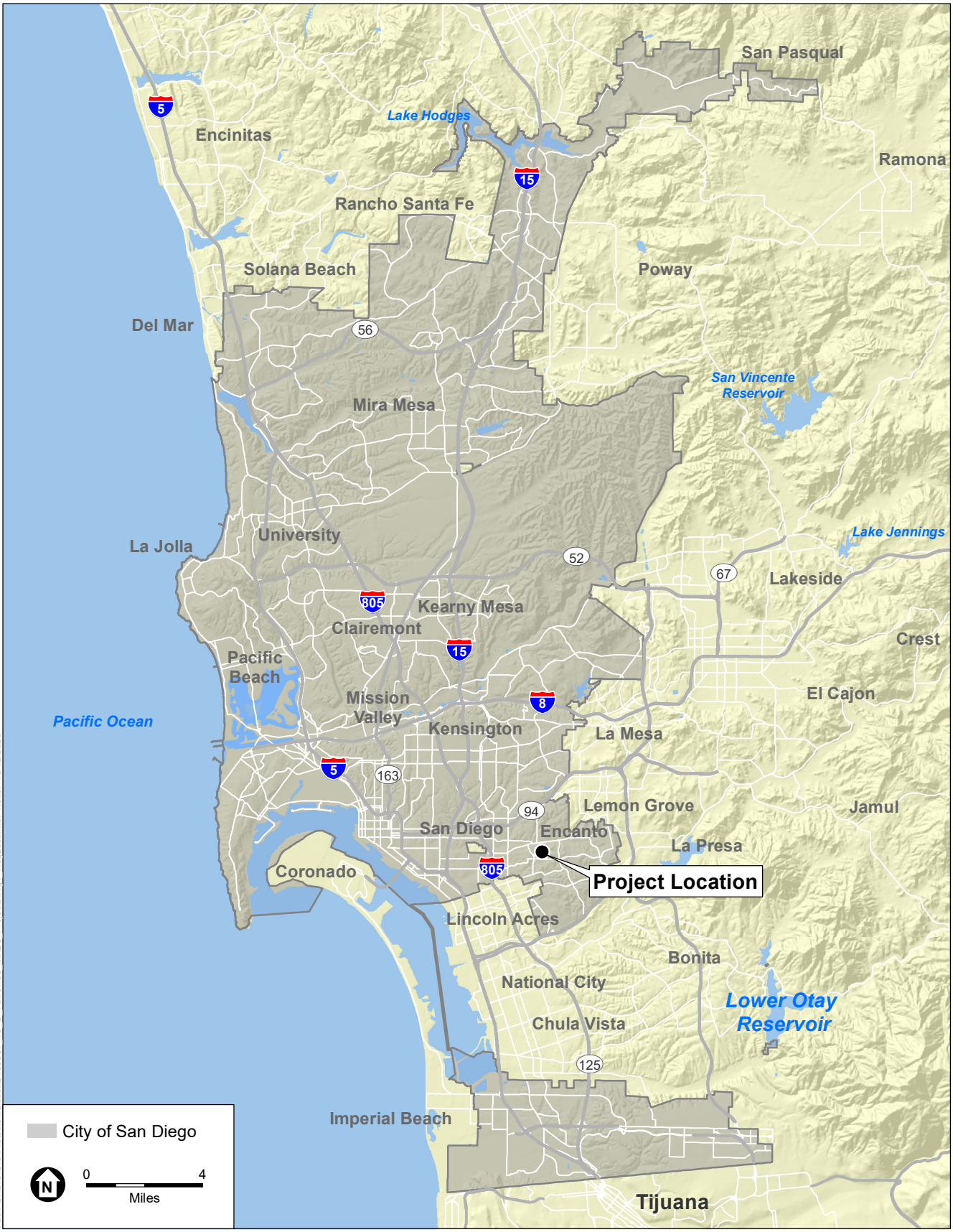
The entire 27.3-acre campus is considered to constitute the Project Site. The Project Site is located entirely within Assessor's Parcel Numbers (APNs) 549-240-07, 549-240-08, and 49-350-01. The Project Site is bound to the north by three residential homes and Pastor Timothy J. Winters Street (previously known as Benson Avenue), to the west by 61st Street, to the south by Skyline Drive, and to the east by single-family residences, as shown in **Figure 2**.

2.2.2 Surrounding Uses

The Project Site is located within a suburban residential neighborhood comprised primarily of single-family (one- and two-story) homes. Residences surround the Project Site to the north, east, south, and west. A church is located adjacent to and north and south of the Project Site, Martin Luther King Jr. Memorial Park is located approximately 500 feet to the southeast; and Maranha Seventh-Day Adventist Church to the south across Skyline Drive.

2.2.3 Project Site Characteristics

The entire 27.3-acre Project Site is zoned as Residential-Single Unit RS-1-1 (City of San Diego 2019). According to the City of San Diego General Plan, the Project Site has a land use designation of Institutional and Public and Semi-Public Facilities, which is consistent with its use as a school (City of San Diego 2018). By state law, school facilities can be exempted from local zoning ordinances consistent with California Government Code Section 53094. The District Board of Education adopted a resolution on July 10, 2018, exempting O'Farrell Charter School from local zoning ordinances consistent with the Project being carried out as described in this Initial Study.



SOURCE: ESRI; SanGIS

O'Farrell Charter School Whole Site Modernization Project

Figure 1
Regional Location

ESA

SAN/16XX/D160537.00 - San Diego Unified School District On-Call CEQA Services/03 Working Documents/D160537.16 - O'Farrell MND/05 Graphics-GIS-Modeling/Illustrator

SOURCE: Google Earth, 2020; ESA, 2020.

O'Farrell Charter School Whole Site Modernization Project

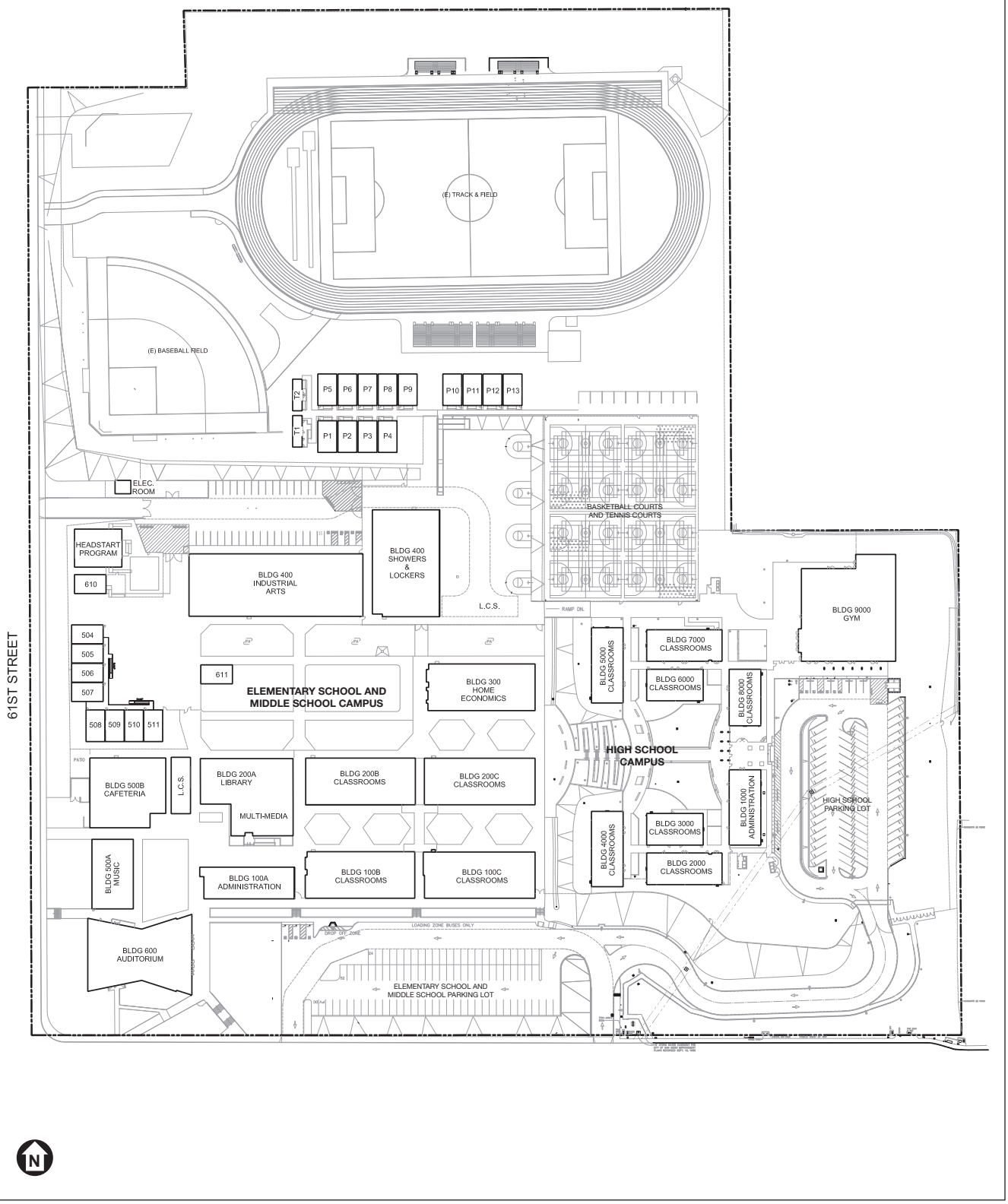
Figure 2
Project Location

ESA

The Project Site is currently occupied by O'Farrell Charter School, which includes O'Farrell Elementary School and O'Farrell Middle School on the western portion of campus, and O'Farrell High School on the eastern portion of the campus. The layout of the existing campus is shown in detail on **Figure 3**. The O'Farrell Community School campus was originally opened in 1960 and has undergone a name change and an expansion in size and facilities given the grades it now serves (District 2013). In 2013, the District approved a modernization project and adopted a Final MND for the campus. Improvements included but were not limited to, window modifications; installation of heating, ventilating, and air conditioning (HVAC) units; Americans with Disabilities Act (ADA) improvements; plumbing upgrades; construction of the high school on the eastern portion of campus (which included eight new classroom buildings and a gym); a new high school parking lot; and playfields, including a football field, baseball field, and running track in the northern portion of campus. In 2016, during construction of the modernization project, Addendum Number 1 to the 2013 Final MND was prepared and adopted, as it was determined that soils that were previously identified for export would need to be reused on site because of soil contamination (District 2016). The use of soils on site resulted in the increase of elevation of the playfields, construction of a berm on the north side of campus, and construction of bioswales throughout campus. Since 2016, the whole campus has been operating as the O'Farrell Charter School, serving kindergarten through twelfth grade students. The school currently has a reported actual student enrollment of 1,932 for the 2020/2021 school year (District 2020b). Currently the school has 84 classrooms including 60 permanent classrooms and 24 relocatable classrooms.

As shown in **Figure 3**, primary classroom development is situated in the southern portion of the Project Site (fronting Skyline Drive and 61st Street). The elementary school and middle school (kindergarten through eighth grade uses are located on the west side of campus, where buildings include permanent and portable classroom buildings, an auditorium, an administrative building, a cafeteria, library, industrial arts building, and locker rooms. The eastern high school portion of campus includes permanent classroom buildings, an administration building, and a gym. Courtyards, play areas, and student seating areas are located throughout the Project Site. Tennis and basketball courts are located north of the high school, adjacent to the northern playfields. Landscaping is limited to shade trees throughout the Project Site and ornamental landscaping along Skyline Drive and in courtyards in between classrooms.

The Project Site includes three surface parking lots, including one located in the central portion of campus accessed from 61st Street, which includes a student drop-off lane, seven general use parking spaces, 28 staff spaces, and three ADA spaces (for a total of 38 parking spaces). The remaining two surface parking lots are both accessible from Skyline Drive via a one-way entrance and one-way exit driveway, with the kindergarten through eighth grade parking lot located parallel to Skyline Drive and the high school parking lot perpendicular to Skyline Drive. The kindergarten through eighth grade parking lot includes 104 general use parking spaces and four ADA spaces (for a total of 108 parking spaces), and the high school parking lot includes a drop-off lane, 34 general use spaces, 19 student spaces, 16 staff spaces, four school van spaces, and four ADA spaces (for a total of 77 parking spaces). The Project Site also includes a fire lane access point along 61st Street north of the baseball field.



SAN/16XXX/D160537.00 - San Diego Unified School District On-Call CEQA Services/03 Working Documents/D160537.16 - O'Farrell MND/05 Graphics-GIS-Modeling/Illustrator

SOURCE: San Diego Unified School District, 2020

O'Farrell Charter School Whole Site Modernization Project

Figure 3
Existing Project Site Layout

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While the Project Site itself is relatively level (with the exception of the high school campus being elevated and a berm in the northern portion of campus), the surrounding topography slopes downward to the southwest. Pastor Timothy J. Winters Street is topographically higher along the northwestern portion of the Project Site, and then slopes down to below the berm located north of the playfields. Skyline Drive, along the southern boundary of the Project Site, is topographically lower than the Project Site along the eastern portion of campus. Vegetated slopes buffer the Project Site to the north, south, and east.

The school is open during the traditional school year (late August through June), and includes summer school sessions on campus. School hours (and the associated bell schedule) vary by grade, but generally encompass 7:00 a.m. to 3:15 p.m. Monday through Friday, except for early dismissal at 1:30 p.m. on Wednesdays. In addition, there are several after-school clubs that run on the campus. At the time of this analysis, due to the Coronavirus pandemic, all curriculum and class time is entirely virtual and there are no students accessing the campus. While the date in which schools reopen to in person learning is uncertain, the current condition is considered temporary. Therefore, for purposes of this analysis, the baseline environmental characteristics are considered as the 2020-2021 school year.

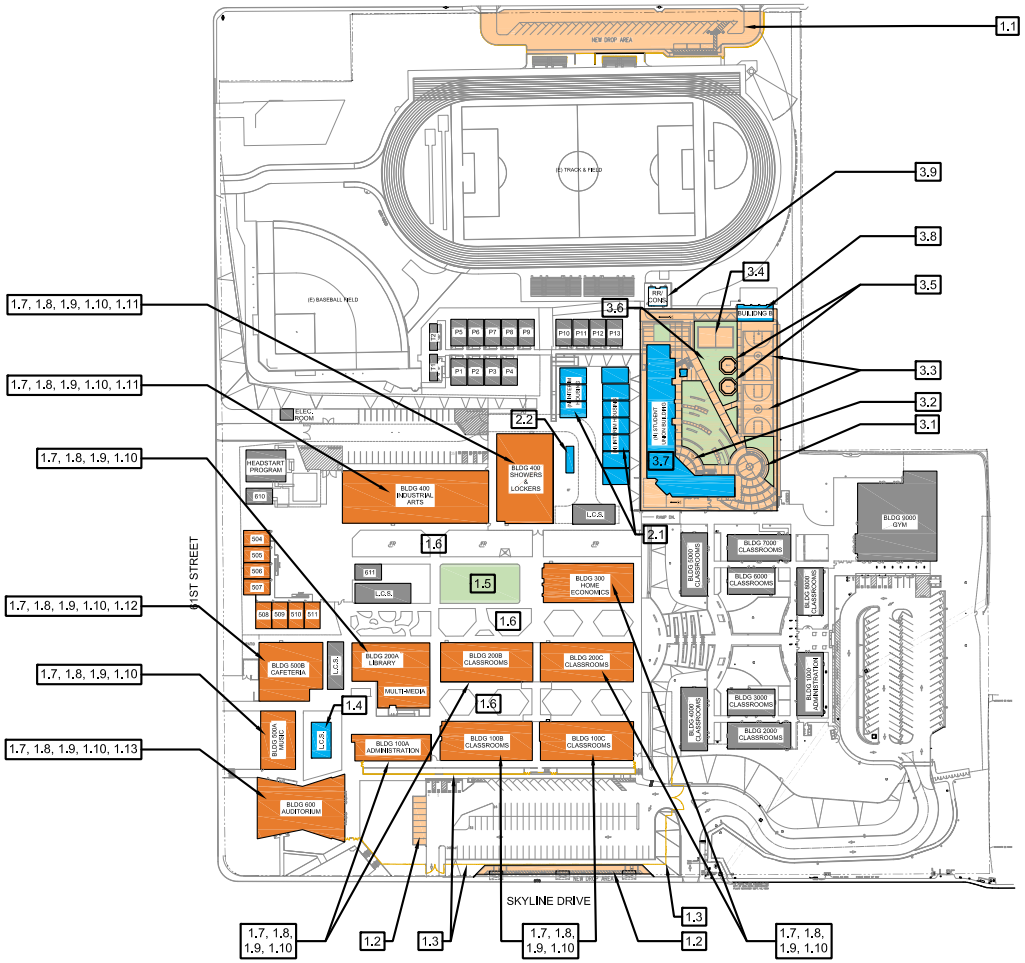
2.3 Project Characteristics

The Proposed Project would modernize the O'Farrell Charter School. Proposed Project components are shown on **Figure 4** and detailed below. The main components include:

- Interim Housing for future Whole Site Modernization
- Student Union and Outdoor Gathering Space
- Whole Site Modernization to Existing Structures
- Access, Parking, and Circulation Improvements
- Landscaping

2.3.1 Interim Housing for Future Whole Site Modernization

To accommodate the students and staff during the interior and exterior modernization elements occurring on the Project Site, ten portable classrooms and one temporary restroom would be installed in the central portion of the campus, south of the existing sports field within an existing hardcourt play area. See elements 2.1 and 2.2 in Figure 4. Modifications to accommodate the interim housing would require the reconfiguration of the existing play area; minor trenching for utilities; and minor grading, grubbing, and re-paving. The interim housing would be removed once the school modernization elements are completed and does not constitute new classroom capacity. Installation of the interim housing would take place between May and August of 2021.



KEY NOTES

4. MODERNIZATION

SITE IMPROVEMENTS

1.1 NEW STUDENT DROP-OFF AND PARKING LOT @ TIMOTHY WINTERS STREET

1.2 NEW STUDENT DROP-OFF AND PARKING LOT IMPROVEMENTS @ SKYLINE DRIVE

1.3 SECURITY FENCING @ MAIN ENTRANCE TO K-8 CAMPUS

1.4 NEW PC LUNCH SHELTER

1.5 NEW TURF FIELD @ ELEMENTARY CAMPUS

1.6 DRAINAGE IMPROVEMENTS THROUGHOUT CAMPUS

BUILDING IMPROVEMENTS

1.7 NEW FLOORING

1.8 NEW INTERIOR LIGHTING

1.9 NEW ROOFING

1.10 REPLACEMENT OF EXTERIOR SOFFITS AND BREEZEWAYS THROUGHOUT CAMPUS

1.11 ADDITION OF KINDER CLASSROOMS @ (E) BLDGS. 400A AND 400B

1.12 NEW KITCHEN EQUIPMENT AND IMPROVEMENTS @ CAFETERIA @ (E) BLDG. 500B

1.13 NEW AUDITORIUM SEATING

2. INTERIM HOUSING

2.1 (10) TEMPORARY PORTABLE CLASSROOMS

2.2 (1) TEMPORARY RESTROOMS

3. STUDENT UNION

BUILDING IMPROVEMENTS

3.1 OUTDOOR AMPITHEATER

3.2 OUTDOOR STAGE WITH LANDSCAPE SEATING

3.3 (2) BASKETBALL COURTS

3.4 VOLLEYBALL COURT

3.5 (2) GAGA PITS

3.6 NEW LANDSCAPE

NEW BUILDINGS

3.7 BUILDING A - STUDENT UNION

3.8 BUILDING B - STORAGE

3.9 BUILDING C - CONCESSIONS / RESTROOMS

GENERAL NOTES

1. FIRE PROTECTION DURING DEMOLITION AND CONSTRUCTION SHALL BE IN ACCORDANCE WITH REQUIREMENTS OF 2019 CBC, CHAPTER 33.

LEGEND TABLE (NOTE: FOR ADDITIONAL INFORMATION, REFER TO KEY NOTES AND GENERAL NOTES)

- MODERNIZED BUILDING STRUCTURE (OR PART OF IT)
- EXISTING BUILDING STRUCTURES (INCLUDES PORTABLES)
- NEW BUILDING
- TURF FIELD (ARTIF., NATURAL, LANDSC. AREAS, ETC.)
- SITE SCOPE NEW/ REPLACEMENT (CONCRETE, ASPHALT PAV., DG, PLAYGROUNDS, ETC.)
- PROPERTY LINE
- NEW FENCE AND GATES

SOURCE: San Diego Unified School District, 2020

O'Farrell Charter School Whole Site Modernization Project

Figure 4
Project Components

2.3.2 Student Union and Outdoor Gathering Space

The Proposed Project would include the removal of the existing asphalt tennis and basketball courts located north of the high school campus, and the construction of a new student union and outdoor gathering space. See in particular elements 3.1 through 3.9 in Figure 4. The 19,000 square foot two-story (38-feet in height) student union (element 3.7) would include six new student classrooms, a practice theater, a workout room, breakout rooms, restrooms, and office space. Once completed, the total number of classrooms on campus would be increased from 84 classrooms (60 permanent classrooms and 24 portable classrooms) to 90 classrooms (including the six new classrooms in the proposed student union).

The proposed outdoor gathering space would include an outdoor amphitheater, outdoor stage with landscape seating, two basketball courts, a volleyball court, two gaga pits (a variation of a handball court), and landscaping. The outdoor gathering space would be used as an occasional student gathering and recreational space, and would not be used for outdoor concerts or large events (including pep rallies or band concerts). Additionally, a 300 square foot concession stand/restroom building and a 1,000 square foot storage building would be constructed in support of the student union building. The proposed student union, concession stand/restroom, and storage building would incorporate a stucco, or similar type of material finish, similar to existing buildings on the campus.

2.3.3 Whole Site Modernization

The Proposed Project would include interior and exterior modernization improvements to all permanent buildings on the kindergarten through eighth grade portion of campus (14 buildings). Improvements would include new flooring, roofing, and interior lighting, and replacement of exterior soffits (rafter beams) and breezeways throughout campus. Security fencing would be constructed at the main entrance to the kindergarten through eighth grade portion of campus, including surrounding the kindergarten through eighth grade parking lot. In addition, the auditorium building (Building 600) would receive new interior seating and the cafeteria building would include new kitchen equipment improvements along with a new covered lunch shelter adjacent to the building. Additionally, new bathrooms would be installed within four kindergarten classrooms which are located within the industrial arts building and locker room building (Building 400). During construction, portable temporary classrooms and restrooms would be added to the campus adjacent to the existing locker building to accommodate students while the campus is under construction (element 2.1 on Figure 4).

2.3.4 Access, Parking, and Circulation

As shown on Figure 4 (element 1.1), the Proposed Project would include a new parking lot and drop-off area north of the football field, accessible via a one-way entrance driveway and one-way exit driveway along Pastor Timothy J. Winters Street. The existing landscaped berm along Pastor Timothy J. Winters Street would be graded to make way for the new parking lot, and soil would be balanced elsewhere on site. The new 11,000 square foot asphalt parking lot would include 26 general-use spaces and two ADA spaces, for a total of 28 parking spaces. The parking lot would

be accessed from the school campus via an existing concrete walkway along the perimeter of the football field.

The kindergarten through eighth grade parking lot along Skyline Drive would also be improved with an addition of eight parking spaces east of the auditorium (element 1.2 in Figure 4), in a portion of the existing natural grass area. In addition, the existing slope between Skyline Drive and kindergarten through eighth grade parking lot would be graded with a retaining wall to create a new drop-off area, curb cut along Skyline Drive. Other kindergarten through eighth grade parking lot improvements include repairs to the existing lot, and circulation restriping.

2.3.5 Landscaping

The southern half of the Project Site consists almost entirely of impervious paved surfaces with small portions of ornamental landscaping within courtyards, and the northern half of the Project Site consists of pervious playfields and vegetated berms. The Proposed Project would involve the replacement of paved tennis and basketball courts with a new building, paved hardscapes, and some pervious landscaping. In addition, the Proposed Project would replace the existing natural turf field at the center of campus, south of the industrial arts building, with artificial turf. The Project also includes irrigation and drainage infrastructure repairs and improvements throughout the Project Site. Additional paving would also be required for the proposed northern parking lot and kindergarten through eighth grade parking lot drop-off improvements. Six ornamental trees on the Project Site would be removed to construct the southernmost drop-off area along Skyline Drive. Additional drought tolerant trees and landscaping would be added throughout the site as necessary. Ornamental vegetation may not be replaced in kind. Overall, there would not be a net change in the amount of impervious surfaces on the Project Site.

2.3.6 Operational Changes

In terms of staffing and student enrollment, no operational changes would occur on the Project Site with implementation of the Proposed Project. School modernization improvements included as part of the Proposed Project would not serve to increase the enrollment of students or staff present on site, but would rather provide infrastructure improvements for the existing student body. While the number of classrooms would increase on campus, the total number of student would not exceed its previously approved enrollment/capacity amount of 1,835 students.

2.4 Construction Process and Timeline

Construction would involve demolition of existing paving, site clearing, grading and excavation of an average of 2 feet below grade for building foundations extending five feet beyond the footprint of the proposed student union, installation of improvements and structural development, and site cleanup. Construction would begin May, 2021 and would occur for approximately 36 months in 3 phases, as detailed below and in **Table 1**.

TABLE 1
CONSTRUCTION PHASING

Phase	Approximate Timeline	Description
Phase 1	May 2021 to August 2021	Construction of portable classrooms/Interim housing
Phase 2	August 2021 to October 2022	Whole site modernization improvements to existing buildings
Phase 3	September 2022 to May 2024	Construction of student union and associated improvements

SOURCE: District 2020c

Construction is expected to occur between 7:00 a.m. and 7:00 p.m., Monday through Friday (sometimes Saturday), and would comply with the City of San Diego Municipal Code limits regarding construction activity (Municipal Code Section 59.5.0404). No nighttime construction would occur. Construction may overlap with active school hours. All construction and work areas would be clearly demarcated and student access would be prohibited, consistent with construction efforts on other District facilities. All construction equipment staging would be located on-site, in clearly demarcated areas that would not disturb existing school uses. All soil excavated during the construction process would be balanced on site. During construction, materials and equipment may be visible from Skyline Drive and Pastor Timothy J. Winters Street, however the District would screen these areas with construction fencing. Construction workers would park on the Project Site in specially designated areas. Construction of the Proposed Project may require temporary lane closures along Skyline Drive and Pastor Timothy J. Winters Street in order to construct the new parking lot and parking lot improvements.

2.5 Discretionary Approvals Required

2.5.1 Lead Agency

In conformance with CEQA Guideline Sections 15050 and 15367, the District is the Lead Agency, which is defined as the "public agency, which has the principal responsibility for carrying out or approving a project." There are no responsible or trustee agencies. The California Division of State Architects (DSA) is a reviewing agency that provides ministerial review of the project design and construction documents for compliance with the California Code of Regulations, Title 24.

2.5.2 Permits and Other Approvals

Actions and approvals that may be required from other agencies for the Proposed Project include:

- DSA – General Construction Permit and compliance with California Code of Regulations Title 24 (Ministerial)
- San Diego Regional Water Quality Control Board – National Pollutant Discharge Elimination System (NPDES) and Stormwater Pollution Prevention Plan (SWPPP) (Ministerial)
- City of San Diego – Encroachment Permits for the northern and southern parking lots (Ministerial)

References

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District. 2013. Final Initial Study/Mitigated Negative Declaration for the O'Farrell Community School Modernization and New High School Facility Project. September 2013.

District. 2016. Addendum No. 1 to the Final Initial Study/Mitigated Negative Declaration for the O'Farrell Community School Modernization and New High School Facility Project. September 2016.

District 2020a. Board of Education Agenda Item Detail: O'Farrell Charter School Action on Charter Revision to Increase Enrollment Projections. July 28, 2020. Available at https://go.boarddocs.com/ca/sandi/Board.nsf/goto?open&id=BQWTP57846DC

District. 2020b. Personal communication with District representative, Paul Garcia re: San Diego Unified School District O'Farrell Charter School Enrollment Numbers 2019-2020. June 04, 2020.

District 2020c. Personal communication with District representatives, Paul Garcia and Dion Harrington. July 30, 2020.

CHAPTER 3
Environmental Checklist

1.	**Project Title:**	O'Farrell Charter School Whole Site Modernization Project
2.	**Lead Agency Name and Address:**	San Diego Unified School District Facilities Planning & Construction 4860 Ruffner Street San Diego, CA 92111
3.	**Contact Person and Phone Number:**	Paul Garcia, CEQA Environmental Coordinator, San Diego Unified School District (619) 913-2999
4.	**Project Location:**	O'Farrell Charter School 6130 Skyline Drive San Diego, CA 92114
5.	**Project Sponsor's Name and Address:**	San Diego Unified School District Facilities Planning & Construction 4860 Ruffner Street San Diego, CA 92111
6.	**General Plan Designation(s):**	Institutional & Public and Semi-Public Facilities
7.	**Zoning:**	RS-1-1, Residential – Multiple Unit
8.	**Description of Project:**	School improvements (see Chapter 2, Project Description)
9.	**Surrounding Land Uses and Setting:**	North: Single-family and Institutional (church) South: Single-family residential East: Single-family residential West: Single-family residential
10.	**Other public agencies whose approval is required:**	Office of the Division of State Architect
11.	**Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource Code Section 21080.3.1:**	Jamul Indian Village requested AB 52 consultation, and consultation was initiated by the District on October 25, 2018.

Environmental Factors Potentially Affected

The following checklist is used to evaluate the potential for significant environmental impacts caused by the Proposed Project. All responses must consider the project in its entirety and any actions involved (i.e., offsite as well as onsite impacts, cumulative as well as project-level impacts, indirect as well as direct impacts, and construction as well as operational impacts).

This checklist is adapted from the form provided in Appendix G of the State CEQA Guidelines (which was updated by the California Resource Agency in December 2018 for implementation in 2019). The checklist is modified as appropriate for this project. There are 21 CEQA subject categories to be considered, with this checklist organized as such. Each subject discussion includes an evaluation matrix, followed by a brief discussion explaining the evaluation rationale. As appropriate, each subject discussion may address more than one specific issue question if there is a salient interrelation.

The 21 CEQA subject categories—or environmental factors—that must be considered are presented below. Each category is scored according to the potential level of impact significance the Proposed Project may have on the environment. The levels of significance are indicated and described below.

3 = Potentially Significant: There is substantial evidence than an effect is significant.

2 = Less than Significant with Mitigation: Applies in situations where a "potentially significant" impact can be reduced to a "less than significant" level with the incorporation of adequate and feasible mitigation measure(s).

1 = Less than Significant: This is an effect that is discernible but would not cause a lasting significant impact.

0 = No Impact: This is an adequate determination if the referenced information sources show that the impact simply does not apply to projects like the one involved.

1	Aesthetics	0	Agriculture and Forestry Resources	2	Air Quality
2	Biological Resources	2	Cultural Resources	1	Energy
1	Geology/Soils	1	Greenhouse Gas Emissions	2	Hazards and Hazardous Materials
1	Hydrology/ Water Quality	0	Land Use/ Planning	0	Mineral Resources
2	Noise	0	Population/Housing	1	Public Services
2	Recreation	2	Transportation	2	Tribal Cultural Resources
1	Utilities and Service Systems	1	Wildfire	2	Mandatory Findings of Significance

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial study:

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

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

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

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

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

Signature	Date
Signature	Date

Environmental Checklist

Aesthetics

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

Discussion

a) **Less-than-Significant Impact.** The Project Site is within an urbanized area on an existing school site. Surrounding land use is dominated by residential development consisting primarily of single-family homes. According to the Encanto Community Plan, a number of prominent canyons and hillsides in the community contribute to providing opportunities for public views and vistas from public rights-of-ways, open space entries, and canyon trailheads throughout the community (City of San Diego 2015). While the Project Site itself does not feature scenic vistas as designated within the Encanto Community Plan, it is located approximately 0.3 miles to the east of a designated public viewshed along Valencia Parkway, and approximately 450 feet west of a public viewshed into Martin Luther King Community Park. However, due to intervening topography, the Project Site is not visible from either of the public viewsheds. While the Proposed Project would include construction near public right-of-ways that would be visible to the public, including a new parking lot along Pastor Timothy J. Winters Street and parking lot improvements along Skyline Drive, the proposed improvements would be largely limited to existing school facilities and would not change the current views to and from the school and designated scenic vistas. As a result, adverse effects on scenic vistas would be less than significant.

b) **No Impact.** Designated scenic highways within the County of San Diego include portions of SR-75, SR-163, SR-125, and SR-78, and eligible state scenic highways include I-5 and SR-52 (Caltrans 2019). The Project Site is more than five miles from SR-75, SR-125, SR-78, and SR-52, and more than three miles from I-5 and SR-163. In

addition, the Project Site does not include scenic trees, rock outcroppings, or historic buildings. Therefore, there are no potential impacts related to scenic resources along a state scenic highway, and no impacts would occur.

c) **Less-than-Significant Impact.** The Project Site is located in an urbanized (suburban) area within an existing school campus. The existing visual character surrounding the Project Site is that of a residential neighborhood, with single-family residences surrounding the school to the north, south, east, and west. The Project Site is currently developed as an operating school with permanent and portable buildings, athletic fields, tennis and basketball courts, playground areas, and associated parking lots. While the Project Site itself is relatively level (with the exception of the high school campus being elevated and a berm in the northern portion of campus), the surrounding topography slopes downward to the southwest.

Public views addressed in this analysis include those from Pastor Timothy J. Winters Street, 61st Street, and Skyline Drive. Views from private residences are not considered protected views under CEQA, and therefore are not further discussed.

Construction of the Proposed Project would include the presence and use of heavy machinery including, but not limited to, large trucks, bulldozers, and a construction staging area. Construction activities associated with the Proposed Project are considered a temporary, short-term visual effect.

All of the Proposed Project improvements would occur entirely within the developed Project Site and would be partially to entirely visible, depending on viewing location. Prominent existing visual elements on the southern end of the Project Site, along Skyline Drive, primarily include the two-story auditorium building, a slight vegetated slope, the kindergarten through eighth grade parking lot, and classroom buildings. Views along Skyline Drive would change due to the proposed student drop-off improvements and security fence construction.

Prominent visual elements on the western portion of the Project Site, along 61st Street, primarily include the two-story auditorium building, cafeteria building, portable classroom buildings, security fencing, and, toward the northern end of 61st Street, a vegetated slope and the baseball field. Views along 61st Street would be modified during construction due to exterior improvements such as new roofing and replacement of exterior soffits and breezeways, however improvements to these structures would be minimal, and primarily include cosmetic restorations.

Due to the sloping nature of Pastor Timothy J. Winters Street, three residential homes, and a berm located north of the Project Site, only selective public views of the Project Site are available from Pastor Timothy J. Winters Street (near both goal lines of the football field). Modifications along Pastor Timothy J. Winters Street would include grading of the existing berm (which would allow more visibility of the existing football field) and the construction of a new parking lot and student drop-off area.

Despite these changes, public views along Skyline Drive, 61st Street, and Pastor Timothy J. Winters Street would not be substantially altered as the proposed modifications would be consistent in size, scale and building materials of existing campus structures. Ornamental landscaping would remain or would be re-planted along the exterior perimeter of the Project Site. Therefore, the visual character and quality of public views would not be significantly impacted from Skyline Drive, 61st Street, or Pastor Timothy J. Winters Street.

Due to site configuration and intervening structures and landscaping, the demolition activities and construction of the temporary portable classrooms, student union building and outdoor gathering space would not be visible from any of the surrounding streets. Other modernization elements of the Proposed Project, including repairing interior and exterior finishes, replacing flooring and interior lighting, and drainage improvements are all small scale modifications that would not constitute a significant change in the visual quality from public views.

Overall, the visual character would be similar to the existing conditions, which is that of a school and school-related uses. Moreover, the Proposed Project would replace the existing aging school infrastructure with new improved structures, and therefore would aim to improve the visual quality of public views of the Project Site. Therefore, impacts on the visual character or quality of public views of the Project Site or surrounding area would be less than significant.

d) **Less-than-Significant Impact.** The Project Site is located adjacent to Pastor Timothy J Winters Street, 61st Street, and Skyline Drive which contain cars and streetlights that emit light and glare during the day and night. In addition, the campus includes existing exterior security lighting that is consistent with District Site Operations Circular No. 1053, which requires all lighting to be turned off prior to 10:00 p.m. to avoid excessive energy consumption and to limit nighttime light spillover into adjacent residential areas.

The Proposed Project would not generate substantially more light and glare compared to existing conditions. Construction activities would only occur during permitted daytime hours, and no nighttime construction or lighting would be required. After completion of construction, no substantial changes to sources of light are expected to occur at the site and its surroundings as a result of implementation of the Proposed Project. While the berm north of the football field would be graded, which would allow more visibility of the football field, stadium lighting does not exist at the Project Site and, therefore, Project implementation would not increase the visibility of lighting at the field. In addition, the proposed northern parking lot would not include the installation of lighting. Therefore, impacts associated with light and glare as they relate to daytime and/or nighttime views in the area would be less than significant.

References

California Department of Transportation (Caltrans). 2019. California Scenic Highway Mapping System: San Diego County. Available at http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/.

City of San Diego. 2015. Encanto Neighborhoods Community Plan. November 16, 2015. Available at: https://www.sandiego.gov/sites/default/files/encanto_community_plan-revised_lu_maps-reduced_6-20-16.pdf

Agricultural and Forest Resources

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
2. AGRICULTURAL AND FOREST 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 Department 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?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

Discussion

a) **No Impact.** The Project Site is in an urbanized area on an existing school site. According to the California Department of Conservation's San Diego County Important Farmland map, the Project Site is classified as "Urban and Built-Up Land," which does not contain any agricultural uses or areas designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (California Department of Conservation 2016). Therefore, the Proposed Project would not convert farmland to a non-agricultural use and no impact would occur.

b) **No Impact.** As mentioned above in Issue 2 (a), the Project Site is fully developed in an urbanized area and does not contain any agricultural land (California Department of Conservation 2016). The Project Site is zoned as RS-1-1, which does not permit agricultural uses beyond limited community gardens (City of San Diego 2019a, City of San Diego 2019b). There are no Williamson Act contracts in the Project vicinity (California Department of Conservation 2019). Therefore, the Proposed Project would not conflict with existing zoning for agricultural use or a Williamson Act contract and no impact would occur.

c) **No Impact.** As mentioned above in Issue 2 (a) and (b), the Project Site is in an urbanized area on an existing school site. The Proposed Project Site is zoned as RS-1-1, which does not include forest lands, timberlands, or timberland zoned Timberland Production (City of San Diego 2019a). Therefore, the Proposed Project would not conflict with existing zoning for forest land and no impact would occur.

d) **No Impact.** As mentioned above in Issue 2 (c), the Project Site is fully developed and, according to the City of San Diego General Plan and Municipal Code, is not designated as forest land (City of San Diego 2015, City of San Diego 2019a). Therefore, the Proposed Project would not result in the loss of forest land or conversion of forest land to non-forest use; therefore, no impact would occur.

e) **No Impact.** As mentioned above, construction and operation of the Proposed Project would have no impact on agriculture or forest resources. Additionally, there would be no need for land acquisitions to implement the Proposed Project. No other changes in the existing environment, which, due to their location and nature, would result in the conversion of farmland to non-agricultural use or conversion of forest land to non-forest use under the Proposed Project. Therefore, there would be no impact.

References

California Department of Conservation. 2019. Williamson Act Program Overview. Available at https://www.conservation.ca.gov/dlrp/wa

California Department of Conservation. 2016. San Diego County Important Farmland 2014. Available at ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/sdg14_w.pdf.

City of San Diego. 2015. City of San Diego General Plan, Land Use and Community Planning Element. Available at https://www.sandiego.gov/sites/default/files/lu_2015.pdf.

City of San Diego. 2019a. San Diego Municipal Code, Chapter 13, Article 1, Division 4, Residential Base Zones. Available at https://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art01Division04.pdf

City of San Diego, 2019b. City of San Diego, Official Zoning Map. Available at https://www.sandiego.gov/sites/default/files/legacy/development-services/zoning/pdf/maps/grid20.pdf. Accessed July 2019.

Air Quality

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY — Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☐	☒
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Discussion

a) **No Impact.** The Project Site is located in the San Diego Air Basin (SDAB), within the jurisdiction of the San Diego Air Pollution Control District (SDAPCD). SDAPCD is required, pursuant to the federal and state Clean Air Acts, to reduce emissions of criteria air pollutants currently designated as in nonattainment of federal and state ambient air quality standards in the SDAB. The SDAB is currently designated as a federal nonattainment area for the 2008 and 2015 8-hour ozone (O3) standard. In addition, the SDAB is classified as a state nonattainment area for the California standards for O3, particulate matter less than 2.5 microns (PM2.5), and particulate matter less than 10 microns (PM10). The SDAB is currently classified as a federal attainment/maintenance area for both the federal 1997 8-hour O3 standard and the federal carbon monoxide (CO) standard (USEPA 2020, CARB 2020).

Areas designated as nonattainment of a criteria air pollutant are required to prepare plans showing how the area would meet the state and federal air quality standards by its attainment dates. The San Diego Regional Air Quality Strategy (RAQS) is the region's applicable air quality plan for improving air quality in the SDAB and attaining federal and state air quality standards. The RAQS relies on information from the California Air Resources Board (CARB) and the San Diego Association of Governments (SANDAG), including projected growth in the County, which is based in part on local general plans. Generally, projects that propose development that are consistent with the land use designations and growth anticipated by the local general plan and by SANDAG would be consistent with the RAQS. Therefore, the Proposed Project would need to be consistent with the air quality standards outlined in the RAQS.

The Project would improve and modernize the existing O'Farrell Charter School, including construction of a new student union (which would include six new student classrooms, a practice theater, a workout room, breakout rooms, restrooms, and office

space) and an outdoor gathering space. Improvements would include replacing the existing natural turf field in the center of campus with artificial turf, drainage improvements throughout the campus, security fencing in the southernmost parking lot, a new student drop-off area and parking lot along the northern portion of campus, and improvements to the existing parking lot in the southern portion of campus. In addition, the Proposed Project would include interior and exterior modernization improvements to all buildings on the kindergarten through eighth grade portion of campus (see Chapter 2, Project Description, above for additional details).

The Proposed Project would continue to operate as a school, and would not result in a change in existing land uses. The Project would increase the school's number of classrooms, however, the increase would serve the existing student capacity and would not result in an increase in the number of enrolled students or staff. Therefore, the Project would increase the capacity of the school, but would not increase the school's current number of students and staff, and would not increase motor vehicle trips to the Project Site (as analyzed in Issue 3 (b) below) and would not generate an increase in area housing. As shown under (b) of Issue 3 below, emissions from Project construction and operational activities would be less than SDAPCD thresholds. Project construction would comply with SDAPCD Rules and Regulations, including Rules 50, 51, and 55, which forbid visible emissions, nuisance activities, and require fugitive dust control measures, respectively. As such, the Proposed Project would not conflict with or obstruct the implementation of the San Diego RAQS and there would be no impact.

b) **Less-than-Significant Impact.** Project construction and operation would generate air pollutant emissions that potentially could violate regional air quality standards, or potentially contribute to an existing or projected air quality violation. Project construction and operational emissions were evaluated in order to determine whether there would be a cumulatively considerable net increase of a criteria pollutants for which the Project region is in non-attainment. The Project region, the SDAB, is currently designated as a federal nonattainment area for the federal 2008 and 2015 8-hour ozone standard, and as a state nonattainment area for the California standards for O3, PM2.5, and PM10.

Project construction activities would generate diesel exhaust and fugitive dust from the operation of heavy equipment. Project construction emissions would vary from day-to-day over the approximately 36-month construction duration, depending on the specific type and level of construction activity, fugitive dust, and the prevailing weather conditions. Project construction activities generating air pollutant emissions would include demolition, site preparation, grading, building construction, paving, landscaping, and finishing activities and would occur in three phases: Phase 1 – Construction of Portable Classrooms, Phase 2 – Whole Site Improvements and Phase 3 – Construction of the Student Union (see Chapter 2, Project Description, for additional details). Project construction activities would be relatively short-term, spread-out over a 36-month construction period, and not anticipated to involve substantial work during a single day (i.e., the worst-case day for air emissions [in pounds per day]).

During construction, emissions would result from fugitive dust from ground disturbance; construction equipment and vehicle exhaust; and exhaust and road dust emissions from worker commute trips, material deliveries, and haul truck travel. Emissions would vary from day to day, depending on the level of activity, the specific type of construction activity occurring, and, for fugitive dust, prevailing weather conditions.

Construction-related emissions were quantified for a project similar to the Proposed Project, the *Muir at Anderson School Whole Site Modernization, Initial Study/Mitigated Negative Declaration* (ESA 2019), which will be referred to as the Muir project, using the California Emissions Estimator Model (CalEEMod), version 2016.3.2 for off-road emissions (construction equipment) and 2017 Emission Factors model (EMFAC2017) for on-road emissions (haul trucks, vendor trips and worker trips). The assumptions and methodology used in the prior analysis are similar to those that would be used for the Proposed Project. The most intensive construction phase modeled in the prior Muir project involved building construction, paving and architectural coating activities of a larger sized building than the proposed student union building and outdoor gathering space for this Project and associated site work occurring concurrently. The Proposed Project is anticipated to require similar, but no greater than the peak daily construction equipment, workers, haul and vendor trucks trips as the Muir project. As such, re-running CalEEMod for Proposed Project would result in similar emissions, which would still be substantially less than the thresholds. Therefore, the use of the previous emissions modeling output is appropriate for the Proposed Project.

The maximum daily emissions estimated from Project construction are shown in **Table 2**. Calculations are included in Appendix A.

TABLE 2
MAXIMUM DAILY UNMITIGATED REGIONAL CONSTRUCTION EMISSIONS

	Estimated Emissions (lbs/day)a					
Source	**VOC [c]**	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Maximum Daily Emissions[b]						
Project Construction	69	31	30	<1	8	4
Maximum Daily Regional Construction Emissions	**69**	**31**	**30**	**<1**	**8**	**4**
SDAPCD Thresholds of Significance	75	250	550	250	100	55
Exceeds Thresholds?	No	No	No	No	No	No

[a] Totals may not add up exactly due to rounding in modeling calculations. Detailed emissions calculations are provided in Appendix A.

[b] As a worst case construction day it is assumed that building construction activities will overlap with both paving and architectural activities.

[c] Nitrogen oxides (NOx) and volatile organic compounds (VOC) emissions (e.g., vehicle tailpipe emissions) are O3 precursors, as O3 is not directly emitted, but rather formed by the combination of NOx and VOC in the atmosphere in the presence of sunlight.

SOURCE: ESA 2020.

As shown in Table 2, the maximum daily construction emissions would be below the applicable threshold levels. In addition, the Proposed Project is required to comply with SDAPCD's Rules and Regulations, including Rules 50, 51, and 55, as described above in Issue 3 (a) to further reduce the construction emissions shown in Table 2. Therefore, air quality impacts associated with construction of the Proposed Project would be less than significant.

Operation of the Project's modernization improvements would generate long-term regional emissions of criteria air pollutants and ozone precursors associated with new and modernized building operations, as well as, area sources related to the applications of architectural coatings (i.e., periodic repainting) and consumer products (i.e., cleaning products) and landscaping. As described above, the Proposed Project would serve the existing capacity and would not result in an increase in student capacity. Therefore, no change in the number of vehicle trips associated with operation of the school is anticipated. As such, there would be no mobile source emissions from Project operations.

Daily emissions associated with the operations of the Proposed Project were compared to the relevant thresholds. Operations-related emissions (area and energy sources) were modeled for a project similar to the Proposed Project, as detailed above, using the operational model runs from the Muir project, and compared to applicable SDAPCD thresholds for criteria pollutants, as shown in **Table 3**.

TABLE 3
MAXIMUM DAILY REGIONAL OPERATIONAL EMISSIONS

	Estimated Emissions (lbs/day)[a]					
Emissions Source	**VOC**	**NOx**	**CO**	**SO_2**	**PM10**	**PM 2.5**
Project[b]						
Area Sources	1	<1	<1	0	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile[c]	3	3	22	<1	5	1
Total Project Emissions	**4**	**3**	**22**	**<1**	**5**	**1**
SDAPCD Significance Threshold	*75*	*250*	*550*	*250*	*100*	*55*
Exceed SDAPCD Threshold?	No	No	No	No	No	No

[a] Totals may not add up exactly due to rounding in modeling calculations. Detailed emissions calculations are provided in Appendix A.

[b] The prior Muir project included removing existing emissions as existing classrooms were replaced with new project uses, but the existing uses to be replaced for the Project do not emit operational emissions so removing existing emissions was conservatively not assumed for the Project operational emissions.

[c] The Muir project operational emissions accounted for an increase in operational mobile emissions as a result of an increase in staff and students, while as discussed above, the Project would not result in an increase in the number of enrolled students or staff members, so there would be no change in the number of vehicle trips associated with operation of the school and mobile source emissions would not change from current conditions for the Proposed Project.

SOURCE: Appendix A, ESA 2020

As shown in Table 3, the operational emissions the Proposed Project would be well below the applicable threshold levels and impacts would be and less than significant.

Project construction and operational activities could potentially result in a cumulatively considerable net increase of criteria pollutants in a non-attainment region. The Project Site is within the SDAB, which is classified as a nonattainment area for certain federally and state-designated criteria pollutants, including O_3, PM10, and PM2.5. As shown in Tables 2 and 3, construction and operation emissions of O_3 (precursors of VOC and NOx), PM10, and PM2.5 of the project similar to the Proposed Project would not exceed SDAPCD standards, and therefore, the Proposed Project would not exceed SDAPCD standards. Also, construction emissions would be temporary and localized, and the Proposed Project would comply with all required SDAPCD emissions and fugitive dust measures, which would ensure that the cumulative contribution of criteria pollutants during Project construction would be less than significant.

For public health risk from criteria air pollutants, the maximum daily construction and operational emissions for the criteria pollutants, presented in Tables 2 and 3, respectively, would be below SDAPCD significance thresholds, which were developed such that emissions in the air basin can meet or will maintain compliance with the State and federal ambient air quality standards. The standards were established at levels that provide public health protection and allow an adequate margin of safety, including protecting the health of sensitive populations, such as asthmatics, children, and the elderly. As Project-related construction and operational emissions would not exceed any regulatory thresholds, off-site receptors would not be exposed emission levels in excess of the health-based ambient air quality standards. As such, construction and operation activities related to the implementation of the Proposed Project would not contribute to health effects related to these pollutants, and impacts would be less than significant.

c) **Less-than-Significant Impact with Mitigation Incorporated.** Project construction emissions could potentially expose sensitive air quality receptors to substantial pollutant concentrations. Sensitive air quality receptors are facilities and structures where people, particularly, children, the elderly, and those with respiratory illnesses (e.g., asthma), live or spend considerable amounts of time, such as residences, schools, playgrounds, childcare centers, and athletic facilities. Sensitive receptors located in proximity to the Project Site include the school facilities currently operating on the Project Site, when classes are in session; two churches, Bayview Baptist Church to the north across Pastor Timothy J Winters Street and Maranha Seventh-Day Adventist Church to the south across Skyline Drive; and single-family residences located along the streets surrounding the Project Site, which are Pastor Timothy J. Winters Street to the north, Skyline Drive to the south, Lolly Lane, Kimmy Court and Henson Street to the east and 61st Street to the west.

Construction activities would occur on the Project Site over approximately 36 months. For potential health risks, the construction duration is significantly lower than the 30-year exposure period typically associated with chronic cancer health risks. However, due to

the revision in health risk methodology and the increased risk to young children, the Office of Environmental Health Hazards Association (OEHHA), recommends a health risk assessment (HRA) be conducted for any activities lasting more than two months or disturbing more than one acre (OEHHA 2015). Accordingly, a quantitative construction HRA that was previously conducted for the project similar to the Proposed Project, the *Muir at Anderson School Whole Site Modernization, Initial Study/Mitigated Negative Declaration* (ESA 2019), was used to determine the potential health risk to on-site (school uses) and off-site (residential and church uses) receptors from exposure to diesel particulate matter (DPM) in the exhaust from the construction equipment operation.[1]

Table 4 summarizes the carcinogenic and non-carcinogenic risk for the maximum impacted sensitive residential and onsite school receptors without and with the incorporation of **Mitigation Measures AIR-1** and **AIR-2**, as described below. Detailed assumptions and methodology are included in Appendix A.

TABLE 4
INCREMENTAL INCREASE IN CARCINOGENIC RISK AND HAZARDOUS INDEX

Sensitive Receptor	Maximum Cancer Risk (# in one million) [a]	Chronic Risk Hazard Index (HI)[b]
Risk		
Residential	35.12	0.29
School	26.10	0.40
Maximum Individual Cancer Risk Threshold[c]	1	1
Exceeds Threshold?	**Yes**	No
Risk with Mitigation Measures AIR-1 and AIR-2 Incorporated		
Residential	0.77	0.01
School	0.70	0.01
Maximum Individual Cancer Risk Threshold[c]	10	1
Exceeds Threshold?	No	No

[a] Cancer risk values based on a 30-year exposure of maximum levels of DPM. Residential construction risk was calculated assuming a child was born at the beginning of the project construction and be exposed throughout project construction. School related construction risk assumes the school is closed during the summer (approximately 3-month period) and that the same children are present throughout the entire construction period when school is in session (approximately 9-month period).

[b] Chronic risk HI values based on the annual maximum levels of DPM divided by the corresponding DPM reference exposure levels (RELs).

[c] See text below for explanation of thresholds

See Appendix A for additional details and modeling data.

SOURCE: ESA, 2020.

[1] The Project Site is located near two churches, which would be seen as sensitive receptors. However, because there are residential uses closer to the construction activities than the churches, and the analysis for residential receptors is more conservative than that for church uses (i.e. residential receptors are assumed to be exposed for the full duration of the construction activities where church attenders would only be exposed for an hour or two, one or two times per week), the churches were not included in the modeling.

As shown in Table 4, the chronic health risk hazard index (HI) from the Proposed Project unmitigated construction risk is estimated at 0.29 for residences and 0.40 for students, which is below the significance threshold of a chronic risk HI of greater than 1. However, as shown in Table 4, the maximum incremental increase in cancer risk would be up to approximately 35-in-one-million for residences and 26-in-one-million for students, which would exceed the SDAPCD significance threshold of 1-in-one-million without the incorporation of toxics best available control technologies (T-BACTs), and therefore, would have a potentially significant carcinogenic health risk. However, with the incorporation of Mitigation Measures AIR-1 and AIR-2 (detailed below) (the incorporation of toxics best available control technologies (T-BACTs), carcinogenic risk would be reduced to 0.77 for residents and 0.70 for students, which is below the 10-in-one-million regulatory threshold for projects that have incorporated T-BACTs.[2, 3] With the implementation of Mitigation Measures AIR-1 and AIR-2, health risk impacts from Project construction activities would be less than significant.

Once the Proposed Project is operational, toxic air contaminant emissions would not increase over existing conditions. As the operation of the Project does not change land uses, there would be no new significant sources of toxic air contaminants. Therefore, emissions would be minimal, and compliance with all SDAPCD rules would ensure that nearby sensitive receptors would not be exposed to substantial pollutant concentrations.

The implementation of the Proposed Project would not increase the school's current number of students or staff, and therefore, would not result in an increase in the school's traffic contribution to peak hour traffic at local intersections and associated localized CO concentrations at intersections. Therefore, impacts would be less than significant.

Mitigation Measures:

AIR-1: Equipment Emission Standards. The Proposed Project shall utilize off-road diesel-powered construction equipment that meet or exceed the CARB and USEPA Tier 4 off-road emissions standards for all equipment rated at 50 horsepower (hp) or greater during Project construction. Such equipment shall be outfitted with Best Available Control Technology (BACT) devices including a CARB-certified Level 3 Diesel Particulate Filter or equivalent. A copy of each unit's certified tier specification or model year specification and CARB or SDAPCD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.

2 Mitigation Measures AIR-1 and AIR-2 are considered T-BACTs for this Project.

3 SDAPCD Rule 1210 implements the public notification and risk reduction requirements of State law, and requires facilities with high potential health risk levels to reduce health risks below significant risk levels. Rule 1200 requires that projects that propose to increase cancer risk to between 1 and 10 in one million need to implement T-BACT or impose the most effective emission limitation, emission control device or control technique to reduce the cancer risk. At no time shall a project increase the cancer risk to over 10 in one million or a health hazard index (chronic and acute) greater than one. Projects creating cancer risks less than one in one million are not required to implement T-BACT technology.

Exemptions can be made for specialized equipment where Tier 4 engines are not commercially available within 200 miles of the project site. The construction contractor must identify these pieces of equipment and document their unavailability. The District Facilities Planning and Construction CEQA coordinator shall evaluate the contractor's submission to determine the lack of availability of necessary equipment within the 200-mile range of the Project Site.

AIR-2: Alternative Fuels. No generators shall be used during construction activities. Instead, electricity needed for the operation of construction equipment shall be from the existing site connections. Additionally, all welders associated with building construction activities shall be electric.

Significance Determination: Less than significant with mitigation.

d) **Less–than-Significant Impact.** Project-related odor emissions would be minimal and would not affect a substantial number of people. During construction activities, emissions from construction equipment may be evident in the immediate area on a temporary basis. Potential sources that may emit odors during construction activities include any architectural coating and asphalt paving. Additionally, material deliveries and hauling heavy-duty truck trips could create an occasional "whiff" of diesel exhaust for nearby receptors. These odors would not affect a substantial number of people because the scale of construction would be small. Standard operation of the school would not produce objectionable odors, and there would be no permanent impacts. Therefore, the Proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people, and impacts would be less than significant.

References

California Air Resources Board (CARB). 2018-2019. *Area Designations Maps/State and National*. Available at https://ww2.arb.ca.gov/resources/documents/maps-state-and-federal-area-designations.

Office of Environmental Health Hazard Assessment (OEHHA). 2015. Air Toxics Hot Spots Program Risk Assessment Guidelines - Guidance Manual for Preparation of Health Risk Assessments, February 2015. Available at https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf.

U.S. Environmental Protection Agency (USEPA). 2019. *Criteria Pollutant Nonattainment Summary Report.* Available at https://www3.epa.gov/airquality/greenbook/ancl3.html

Biological Resources

Issues (and Supporting Information Sources):		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
4.	**BIOLOGICAL RESOURCES — Would the project:**				
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☒	☐	☐
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

Discussion

a) **Less-than-Significant Impact with Mitigation Incorporated.** The Project Site is developed as an operating school and is either paved or graded and actively used. No native vegetation is located on the Project Site. Ornamental landscaping is present on the Project Site, including along the periphery of the Project Site along Skyline Drive and 61st Street, and in courtyards between classrooms. Implementation of the Proposed Project would include the removal of ornamental trees, particularly along Skyline Drive, to allow for the construction of the improved parking lot and student drop-off area.

Ornamental vegetation including trees occurring on site provide suitable nesting habitat for migratory birds and raptors protected under the Federal Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code, which prohibit the take or destruction of migratory birds/raptors, their nests, and/or eggs. Construction, which includes removal and replacement of some trees, is anticipated commence in February, 2021 and take approximately 36 months. Therefore, construction is expected to overlap the avian breeding season (generally January 15 through August 31) and could result in direct impacts to nesting raptors and migratory birds. Removal of trees during the breeding

season could result in direct impacts to nesting raptors and migratory birds if nests are present at the time of removal. These direct impacts could include injury or mortality of young (eggs and hatchlings) that cannot escape from the nest during tree or vegetation removal.

Indirect impacts to raptors and migratory birds nesting in trees and vegetation within and surrounding the Project Site could result from construction noise and vibration. Construction noise and vibration could negatively affect a bird's breeding and foraging behavior in a manner that causes nest abandonment. These potential direct and indirect impacts could be significant given that impacts to nesting birds could result in a violation of the MBTA and Sections 3503 and 3503.5 of the California Fish and Game Code. However, with implementation of **Mitigation Measure BIO-1** (detailed below), potential impacts to nesting raptors and migratory birds would be less than significant.

After completion of construction, school activities would continue similar to existing conditions and no impacts to habitats or sensitive species would occur.

Mitigation Measures:

BIO-1: Migratory Birds. To the extent feasible, tree and vegetation removal shall take place outside of the general avian breeding season (January 15 through August 31) and other construction activities shall be initiated outside of the general avian breeding season. If a project proposes construction involving ground disturbance, tree removal, or vegetation trimming or clearing during the nesting season in the vicinity of habitat with potential to support nesting birds, the District shall retain a qualified biologist to perform a nesting bird survey within the construction site. The survey shall be performed within 72 hours prior to project activities. If active nests are identified during the survey, the qualified biologist shall establish appropriate measures to avoid impacts on active nests, which may include a buffer around designated nests or other avoidance measures. The biologist shall monitor the nest, and the avoidance measures shall be in place until it has been determined the young have fledged or the nest has been abandoned.

Significance Determination: Less than significant with mitigation.

b) **No Impact.** The Project Site is developed as an operating school and all areas on campus are either paved or graded; there is no riparian habitat on the Project Site. All Project construction and operational activities would occur within the Project boundaries, and therefore, there would be no impacts to riparian habitat or sensitive natural communities.

c) **No Impact.** No state or federally protected wetlands are present within or adjacent to the Project Site (Fish and Wildlife Service 2020). The Proposed Project would occur entirely within the existing developed school campus. Therefore, the Proposed Project would not affect any state or federally protected wetlands either directly or indirectly. Thus, no impact would occur.

d) **No Impact.** The Project Site is located in an urban and developed area surrounded by residential development. The Project Site is completely developed as an operating school and is either paved or graded and actively used. The Project Site and surrounding area do not contain any streams or bodies of water that may be inhabited by any native resident or migratory fish species. Because the Proposed Project would occur on an existing developed school campus, the Project Site is not considered a migratory wildlife corridor. Therefore, the Proposed Project would not result in the interference of the movement of any native or migratory species, wildlife corridors, or the use of native wildlife nursery sites. Thus, no impact would occur.

e) **Less-than-Significant Impact.** The Proposed Project would be in compliance with the City's General Plan and Municipal Code related to the protection of biological resources, however, they do not include policies specific to the protection of trees. The Encanto Neighborhoods Community Plan (Community Plan) includes a chapter on the community's urban forest, with the overall intent to create a comprehensive street tree plan to help unify major corridors, provide shade and street tree coverage, to enhance the urban forest, to maximize benefits of trees, and increase efficiencies in managing trees (City of San Diego 2016). According to the Community Plan, Jacaranda trees are identified as being thematic street trees along Skyline Drive, however, the Community Plan states that other trees may be planted to provide flexibility and variation of species between each street block.

Construction of the Proposed Project would require removal six Jacaranda trees along Skyline Drive to implement an improved student drop-off area. However, the Proposed Project would not conflict with any local policies or ordinances protecting trees, because there are no applicable policies or ordinances that the District must adhere to with respect to ornamental trees or vegetation, and impacts would be less than significant.

f) **No Impact.** The Project Site is fully developed in an urban area. In the City of San Diego, local habitat, species, and biological resources are protected under the City's Multiple Species Conservation Program (MSCP). To implement the MSCP, the City developed Multi-Habitat Planning Areas (MHPA). The Project Site itself is located outside of the MSCP MHPA boundaries (City of San Diego 2008). Therefore, the Proposed Project would not conflict with applicable conservation plans, and no impact would occur.

References

City of San Diego, 2008. City of San Diego General Plan, Conservation Element. Available at https://www.sandiego.gov/sites/default/files/legacy//planning/genplan/pdf/2012/ce120100.pdf

____. 2016. Encanto Neighborhoods Community Plan. Available at https://www.sandiego.gov/sites/default/files/encanto_community_plan-revised_lu_maps-reduced_6-20-16.pdf

County of San Diego. 1998. Final Multiple Species Conservation Program. Available at http://www.sandiegocounty.gov/content/dam/sdc/pds/mscp/docs/SCMSCP/FinalMSCPProgramPlan.pdf.

U.S. Fish and Wildlife Service. 2020. National Wetlands Inventory. Available at https://www.fws.gov/wetlands/data/mapper.html.

Cultural Resources

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES — Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to in §15064.5?	☐	☒	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Discussion

The analysis of impacts to cultural resources is based on the following memorandum: *California Register of Historical Resources Evaluation of O'Farrell Charter School Pursuant to CEQA Compliance, San Diego Unified School District* prepared by ICF in January 2013. The memorandum includes an evaluation of O'Farrell Charter School for inclusion in the California Register of Historical Resources (CRHR), a records search conducted at the California Historical Resources Inventory System (CHRIS) South Coastal Information Center (SCIC), and a review of historical topographic maps and aerial photographs. The memorandum is included as Appendix B.

a) **Less-Than-Significant Impact.** As part of the 2013 memorandum, ICF conducted an in-depth evaluation of the O'Farrell Charter School campus for inclusion in the CRHR. The evaluation included archival research and a historic architectural resources survey of the campus. The campus was designed in 1958 by Frank L. Hope and Associates, an important San Diego architectural firm, and constructed in 1960. At the time of ICF's survey of the campus, nine buildings dated to the campus's original construction. Based on the results of the archival research and survey, ICF recommended the campus ineligible for listing in the CRHR. The campus was ineligible under Criteria 1 and 2 because it is not associated with significant events or individuals, respectively. Although the campus was designed by Frank L. Hope and Associates, an important San Diego architectural firm, it does not represent a master work by the firm, and, therefore, is not eligible under Criterion 3. The campus is ineligible under Criterion 4 because it does not reveal important information about history. Therefore, the O'Farrell Charter School does not qualify as a historical resource and changes to the campus as a result of Project implementation would not constitute a significant impact.

The SCIC records search did not identify the presence of cultural resources within the Project Site or a 0.25-milue radius around the Project Site. Geologic mapping indicates the Late Oligocene-age (33.9 million to 23 million years ago) Otay Formation (map unit TO) and the Pleistocene-age (2,580,000 to 11,700 years ago) San Diego Formation (map unit Tsdss) are mapped at the surface within the Project Site (Kennedy and Tan, 2005). Both formations are too old to have preserved subsurface prehistoric archaeological

resources. The historic topographic map and aerial photographic review indicate the Project Site and vicinity were not developed or intensively used during the historic-period until the school was constructed.

Based on ICF's assessment, there are no known historical resources within the Project Site. Furthermore, the likelihood for encountering sub-surface archaeological resources that qualify as historical resources is low given the age of the geologic units within the Project Site and the lack of evidence for historic-period use. However, Project implementation does involve ground disturbing activities, which have the potential, albeit low, to disturb unknown archaeological resources that qualify as historical resources should they underlie the Project Site. Implementation of **Mitigation Measures CUL-1 through CUL-3** would reduce potential impacts to less than significant.

Mitigation Measures:

CUL-1: Retention of Qualified Archaeologist. Prior to the start of any ground disturbing activities, a qualified archaeologist, defined as an archaeologist meeting the Secretary of the Interior's Standards for professional archaeology (U.S. Department of the Interior 2008) shall be retained by District to carry out all mitigation measures related to cultural resources.

CUL-2: Cultural Resources Sensitivity Training. Prior to start of any ground-disturbing activities, the qualified archaeologist shall conduct cultural resources sensitivity training for all construction personnel associated with the Project. Construction personnel shall be informed of the types of cultural resources that may be encountered during construction, and of the proper procedures to be enacted in the event of an inadvertent discovery of archaeological resources or human remains. District shall ensure that construction personnel are made available for and attend the training and retain documentation demonstrating attendance.

CUL-3: Unanticipated Discoveries. In the event of the unanticipated discovery of non-prehistoric archaeological materials, all work shall immediately cease in the area (within approximately 100 feet) of the discovery until it can be evaluated by the qualified archaeologist. Construction shall not resume until the qualified archaeologist has conferred with District, and if necessary, the appropriate Native American representatives for prehistoric resources, on the significance of the resource.

If it is determined that the discovered archaeological resource constitutes a historical resource or a unique archaeological resource under CEQA, avoidance and preservation in place is the preferred manner of mitigation. Preservation in place may be accomplished by, but is not limited to, avoidance, incorporating the resource into open space, capping, or deeding the site into a permanent conservation easement. In the event that preservation in place is demonstrated to be infeasible and data recovery through excavation is the only feasible mitigation available, an Archaeological Resources Treatment Plan shall be prepared and implemented by the qualified archaeologist in consultation with District that provides for the adequate recovery of the scientifically consequential information contained in the archaeological resource. The qualified archaeologist and District shall consult with appropriate Native American representatives in determining treatment for

prehistoric or Native American resources to ensure cultural values ascribed to the resource, beyond those that are scientifically important, are considered.

Significance Determination: Less than significant with mitigation.

b) **Less-Than-Significant Impact with Mitigation Incorporated.** As mentioned above, the SCIC records search did not identify the presence of archaeological resources within the Project Site. Additionally, the likelihood for unknown subsurface archaeological resources to underlie the Project Site is low. However, Project implementation involves ground disturbing. These activities have the potential, albeit low, to disturb archaeological resources and cause a substantial adverse change in the significance of an archaeological resource, if found during construction. With the incorporation of **Mitigation Measures CUL-1 through CUL-3**, impacts to archaeological resources would be reduced to a less than significant level.

c) **Less-than-Significant Impact.** No known human remains exist within the Project Site. However, the Project involves ground disturbance that, while unlikely, has the potential to encounter buried human remains. Should Project-related ground disturbance unearth, expose, or disturb previously unknown human remains, the statutes of PRC Section 5097.98 and Health and Safety Code Section 7050.5 should be followed. Accordingly, the San Diego County Coroner must be notified in the event human remains are encountered. If the County Coroner determines that the remains are Native American, the California Native American Heritage Commission (NAHC) would be notified in accordance with Health and Safety Code Section 7050.5, subdivision (c), and PRC Section 5097.98 (as amended by Assembly Bill 2641). The NAHC would designate a Most Likely Descendent for the remains per PRC Section 5097.98. As the Project contractor would be required to comply with applicable Health and Safety Codes, impacts to human remains would be less than significant.

References

Yates, Timothy and Martin D. Rosen. 2013. *California Register of Historical Resources Evaluation of O'Farrell Charter School Pursuant to CEQA Compliance, San Diego Unified School District*. Prepared for the San Diego Unified School District by ICF International.

Kennedy, Michael P., and Siang S. Tan. 2005. Geologic Map of the San Diego 30' x 60' Quadrangle, California. California Department of Conservation, Sacramento, and United States Geological Survey.

Energy

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

Discussion

a) **Less-Than-Significant Impact.** This section analyzes impacts on energy resources due to construction and operation of the Proposed Project. Project construction would consume energy primarily from on- and off-road vehicle fuel consumption in the form of diesel, gasoline, and electricity from water conveyance for dust control. Project operations would consume energy in the form of electricity for lighting and water conveyance, and natural gas for heating/cooling of new and modernized buildings.

Construction

Construction-related energy requirements and energy use efficiencies by energy type for each construction stage were quantified for a project similar to the Proposed Project, the *Muir at Anderson School Whole Site Modernization, Initial Study/Mitigated Negative Declaration* (ESA 2019), which will be referred to as the Muir project. The assumptions and methodology used in this prior analysis are similar to those that would be used for the Proposed Project. As such, re-running CalEEMod for Proposed Project would result in similar construction energy consumption. Therefore, the use of the previous emissions modeling output is appropriate for the Proposed Project.

The estimated fuel usage for off-road equipment is based on the number and type of equipment that would be used during construction activities, hour usage estimates, the total duration of construction activities, and hourly equipment fuel consumption factors from the CARB OFFROAD model, which was used in the air quality analysis. On-road vehicles would include vendor trucks to deliver supplies necessary for construction, and fuel used for construction employee commute trips. Electricity used from water conveyance for dust control was calculated using assumptions for gallons used per acre per day and CalEEMod water conveyance intensity factors were applied to calculate total construction electricity consumption. Construction activities typically do not involve the consumption of natural gas.

Table 5 summarizes the total fuel and electricity consumption from construction activities of the project similar to the Proposed Project.

TABLE 5
SUMMARY OF ENERGY CONSUMPTION DURING PROJECT CONSTRUCTION

Fuel Type	Annual Average Quantity	Total Quantity
Gasoline	**Gallons**	**Gallons**
On-Road Construction Equipment	2,096	5,241
Off-Road Construction Equipment	0	0
Total Gasoline	2,096	5,241
Diesel	**Gallons**	**Gallons**
On-Road Construction Equipment	1,932	4,830
Off-Road Construction Equipment	24,173	60,433
Total Diesel	26,105	65,263
Electricity	**kWh**	**kWh**
Water Conveyance for Dust Control	57,466	143,664
Project Length	3 years	

SOURCE: ESA, 2020

As shown in Table 5, the energy consumption summary provided represents the amount of energy that could potentially be consumed during construction based on a conservative set of assumptions, provided in Appendix A. As shown in Table 5, on- and off-road vehicles would consume an annual estimated average of 2,096 gallons of gasoline, approximately 26,105 gallons of diesel fuel, and approximately 57,466 kWh of electricity throughout construction. For comparative purposes, the fuel consumption during Project construction would represent approximately 0.0002 percent of the 2018 annual on-road gasoline-related energy consumption and 0.01 percent of the 2017 annual diesel fuel-related energy consumption in San Diego County. Electricity would represent approximately 0.0004 percent of San Diego Gas and Electric's (SDG&E) total electricity sales for 2019. Detailed calculations are shown in Appendix A.

Project construction contractors would be required to comply with applicable CARB regulations governing the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. CARB adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling time in order to reduce public exposure to diesel particulate matter and other toxic air contaminants. CARB approved the Truck and Bus regulation to reduce NO_X, PM10, and PM2.5 emissions from existing diesel vehicles operating in California. In addition to limiting exhaust from idling trucks, CARB recently promulgated emission standards for off-road diesel construction equipment of greater than 25 horsepower to reduce emissions by requiring the installation of diesel soot filters and encouraging the retirement, replacement, or repower of older, dirtier engines with newer emission-controlled models.

While intended to reduce construction criteria pollutant emissions, compliance with the above anti-idling and emissions regulations would also result in a more efficient use of construction-related energy and the minimization or elimination of wasteful and unnecessary consumption of energy. The regulation was estimated by CARB to reduce non-essential idling and associated emissions of diesel PM and NO_X emissions by 64 and 78 percent, respectively, in analysis year 2009. These reductions in emissions are directly attributable to overall reduced idling times and fuel combustion as a result of compliance with the regulation.

Project construction compliance with CARB regulations would result in energy savings of approximately 332 gallons of diesel fuel saved per year, assuming a fuel reduction equivalent to the percent reduction of diesel PM or NO_X, as estimated by CARB for 2009 (the lesser value, i.e., 64 percent, is used as a conservative assumption). Heavy-duty engines continue to become more efficient and reduction amounts may lessen in the future due to this. Although the energy savings cannot be precisely quantified, the Project would still reduce consumption of diesel fuel under the anti-idling measure.

Project construction use of electricity would be temporary, sporadic, and cease upon completion of Project construction. Electricity for water conveyance would only be used when necessary to reduce fugitive dust, which would decrease after completion of the earth-moving phases and paving, when the Project Site would be paved and less dust to control. Thus, construction of the Project would use energy necessary to build the Project, but would not result in the wasteful, inefficient, and unnecessary use of energy, and impacts would be less than significant.

Operations

Project operations would consume energy from electricity for lighting and water conveyance, and natural gas for heating/cooling of new and modernized buildings. During operation of the Project, energy would be consumed for multiple purposes, including, but not limited to, heating/ventilating/air conditioning (HVAC); refrigeration; lighting; and the use of electronics, equipment, and appliances for the new student union and modernized existing buildings.

Operations-related energy requirements and energy use efficiencies by energy type were quantified for a project similar to the Proposed Project, the Muir project. Electricity and natural gas usage were estimated using CalEEMod emission factors, while fuel consumption was estimated using EMFAC2017 emission factors and total vehicle miles traveled (VMT) from the CalEEMod emissions modeling for the Project. The Muir project operational energy usage accounted for the operations of similar, but greater new building square footage as compared to the Project. Furthermore, the Muir project operational energy usage included transportation energy usage for of an increase in staff and students; while as discussed above, the Proposed Project would not result in an increase in the number of enrolled students or staff members, so there would be no change in the number of vehicle trips associated with operation of the school and transportation energy consumption would not change from current conditions for the

Proposed Project. Therefore, the operational energy usage for the Proposed Project would be lower than those for the Muir project and those presented in Table 6. **Table 6** summarizes the Project's operational energy usage by sources in comparison to SDG&E and San Diego County's transportation fuel use.

The Project would increase demand for electricity including what is needed to support building operations. As shown in Table 6, the Project would result in a projected total consumption of electricity of approximately 0.17 gigawatt hours (GWh) per year and represent 0.001 percent of SDG&E's total sales in 2018.

TABLE 6
PROJECT ESTIMATED OPERATIONAL ENERGY USAGE AND REGIONAL ENERGY SUPPLY

Source	Natural Gas Per Year (million kBtu)[a]	Electricity Per Year (GWh)[b]	Gasoline (gallons)	Diesel (gallons)
SDG&E (2019)	41,323	15,163	—	—
San Diego County Fuel Use (2018)[c]	—	—	1,387,000,000	215,000,000
Proposed Project [d]				
Building Electricity	0.14	0.16	—	—
Water Heating and Conveyance	—	0.01	—	—
Transportation Energy[e]	—	—	55,979	6,055
Total	**0.14**	**0.17**	**55,979**	**6,055**
Percent of SDG&E/San Diego County	0.0003%	0.001%	0.004%	0.003%

NOTES:

[a] San Diego Gas and Electric, 2018 Energy Data, 2018. Available at: https://energydata.sdge.com/

[b] San Diego Gas and Electric, 2018 Energy Data, 2018. Available at: https://energydata.sdge.com/

[c] California Energy Commission (CEC), California Annual Retail Fuel Outlet Report, 2017.

[d] Project electricity and natural gas was calculated using CalEEMod outputs. The prior Muir Project included removing existing energy consumption as existing classrooms were replaced with new project uses, but the existing uses to be replaced for the Project do not consume energy so removing existing emissions was conservatively not assumed for the Project operational emissions.

[e] The Muir project operational energy consumption accounted for operational transportation energy consumption as a result of an increase in staff and students, while as discussed above, the Project would not result in an increase in the number of enrolled students or staff members, so there would be no change in the number of vehicle trips associated with operation of the school and transportation energy consumption would not change from current conditions for the Proposed Project.

SOURCE: ESA, 2020.

The Project would result in a slight increase in the demand for natural gas resources. As shown in Table 6, operation is projected to generate an annual net total demand for natural gas of approximately 0.14 million kBtu and 0.0003 percent of SDG&E's total sales in 2018. As with electricity, operation would comply with the applicable provisions of Title 24 and the CALGreen Code in effect at the time of building permit issuance to minimize natural gas demand. As such, operation would minimize energy demand. Therefore, with the incorporation of these features, operation of the similar project, and

thus the Proposed Project, would not result in the wasteful, inefficient, and unnecessary consumption of natural gas and impacts would be less than significant.

As discussed above, the similar Muir project would increase the demand for fuel resources due to an increase of staff members (shown in Table 6). However, as discussed above, the Proposed Project would not result in an increase in the number of enrolled students or staff members, as the intent of the Project is to serve the existing approved number of enrolled students. As the Proposed Project does not change the current number of students or staff of the existing school, the Proposed Project would not change its existing demand for fuel resources for the existing school. Therefore, the Proposed Project's fuel consumption would not result in the wasteful, inefficient, and unnecessary consumption of fuel and impacts would be less than significant.

b) **Less-Than-Significant Impact.** Project construction equipment would comply with federal, state, and regional requirements, where applicable. With respect to truck fleet operators, United States Environmental Protection Agency (EPA) and National Highway Traffic Safety Administration (NHTSA) have adopted fuel efficiency standards for medium- and heavy-duty trucks. The Phase 1 heavy-duty truck standards apply to combination tractors, heavy-duty pickup trucks and vans, and vocational vehicles for model years 2014 through 2018 and result in a reduction in fuel consumption from 6 to 23 percent over the 2010 baseline, depending on the vehicle type. The EPA and NHTSA also adopted the Phase 2 heavy-duty truck standards, which cover model years 2021 through 2027 and require the phase-in of a 5 to 25 percent reduction in fuel consumption over the 2017 baseline depending on the compliance year and vehicle type. The energy modeling for trucks does not take into account specific fuel reductions from these regulations, since they would apply to fleets as they incorporate newer trucks meeting the regulatory standards; however, these regulations would have an overall beneficial effect on reducing fuel consumption from trucks over time as older trucks are replaced with newer models that meet the standards.

In addition, construction equipment and trucks are required to comply with CARB regulations regarding heavy-duty truck idling limits of five minutes at a location and the phase-in of off-road emission standards that result in an increase in energy savings in the form of reduced fuel consumption from more fuel-efficient engines. Although these regulations are intended to reduce criteria pollutant emissions, compliance with the anti-idling and emissions regulations would also result in the efficient use of construction-related energy.

Electricity and natural gas usage during Project operations, as reported in Table 6, would be minimized through incorporation of applicable 2019 Title 24 standards and applicable 2019 CALGreen requirements.

With respect to operational transportation-related fuel usage, the Project would support statewide efforts to improve transportation energy efficiency and reduce transportation energy consumption with respect to private automobiles. The Project would comply with

CAFE fuel economy standards and the Pavley and Low Carbon Fuel standards, which are designed to result in more efficient use of transportation fuels.

As discussed in detail below in Issue 8, Greenhouse Gas Emissions, the most applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas (GHG) emissions are Assembly Bill (AB) 32 and Senate Bill (SB) 32, which codified the state's long-term GHG emissions reduction targets. Consistent with recent juridical and legislative action, this analysis also considers the long-range (2050) reduction target outlined in Executive Order (EO) S-3-05. Additionally, the analysis considers consistency with the District's "Dream Big" Ideas, which were developed to support GHG reductions consistent with regional and statewide targets. GHG reduction plans consider strategies that result in energy savings such as increasing renewable electricity use, reducing water use, and improving overall energy efficiency of buildings and mobile sources. Therefore, since Project operation is consistent with AB32, SB32, Title 24, and CALGreen standards, it does not obstruct any applicable renewable energy or energy efficiency plan, and impacts are less than significant.

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Geology, Soils, and Seismicity

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

Discussion

a) **Less-than-Significant Impact.**

i) Similar to all of southern California, the Project Site is in a known seismically active region where the potential of seismic hazards exists. According to the Seismic Safety Study prepared for the City of San Diego in 2008, the Project Site is not located within an Alquist-Priolo Fault Zone. The nearest Alquist-Priolo Fault is the La Nacion Fault Zone, which extends from the southern U.S. border north through central San Diego, approximately two miles from the Project Site. Therefore, there is not a risk of fault rupture of a known Alquist-Priolo Fault on the Project Site, and impacts would be less than significant.

ii) All of San Diego County, including the Project Site, is located within a known seismically active region and is subject to ground shaking. A seismic event on the La Nacion fault (or other nearby faults) could cause significant ground shaking on the Project Site. Construction of the new school facilities would be required to comply with all seismic-safety development requirements, including the Title 24 standards of the California Building Code under the direction and approval authority of the Division of the State Architect. Conformance with all applicable seismic-safety development requirements would minimize seismic ground shaking effects in the event of a major earthquake and ensure that the potential seismic or geologic hazard impacts are not significant. Conformance with all applicable seismic-safety development requirements would ensure that seismic ground shaking effects would be less than significant.

iii) Liquefaction occurs when cohesion-less soils become liquefied when agitated by strong vibratory motion due to earthquakes. Research and historical data indicate that loose granular soils and non-plastic silts that are saturated by a relatively shallow groundwater table are susceptible to liquefaction. The Proposed Project consists of demolition and modernization improvements to existing facilities and construction of new school buildings (including the proposed student union, storage building, concession/restroom building, and temporary portable classrooms).

According to the Encanto Neighborhoods Community Plan, the Project Site is not located in an area with known liquefaction potential (City of San Diego 2016). As a result, the Proposed Project would not expose people or structures to potentially substantial adverse effects related to liquefaction, and impacts would be less than significant.

iv) According to the Encanto Neighborhoods Community Plan, the Project Site is mapped as a "slide-prone formation", due to the hilly topography of the community (City of San Diego 2016). Although the Project Site and surrounding community are considered slide prone, the general topography of the Project Site has been modified through previous development activities, and is relatively flat, with exception of the high school campus being elevated and a berm in the northern portion of campus. Additionally, all improvements would occur within the existing school property, which has a low potential for ground-failure because the Project Site has been previously graded and developed. Therefore, given the existing conditions of the Site, and conformance with all applicable seismic-safety development requirements during improvement activities, impacts related to landslides would be less than significant.

b) **Less-than-Significant Impact.** The entire Project Site has been disturbed through prior development of the campus. Soils under the Project Site are classified primarily as Diablo Urban land complex, which are well-drained, silty-clay soils compounded with urban lands (NRCS 2020). Implementation of the Proposed Project would not result in

substantial soil erosion or loss of topsoil, as developed areas are less likely to erode and the soils on the Project Site were previously altered from the original construction and 2016 updates of the campus. Construction activities would include ground disturbance, including grading of the berm located along Pastor Timothy J. Winters Street. All soils would be balanced on site and compacted. Additionally, the Project would be required to prepare a Storm Water Pollution Prevention Plan (SWPPP), which would include best management practices (BMPs) such as erosion control requirements during construction. Given the shallow depth of earthwork required and the site's relatively level topography, rapid storm water runoff would be limited, and would not exacerbate erosion potential with implementation of a SWPPP. Therefore, impacts would be less than significant related to soil erosion.

c) **Less-than-Significant Impact.** As previously discussed above, the Project Site has low potential for liquefaction, landslides, and soil erosion, and impacts are considered less than significant. Since the Project Site has been previously developed, risks for soil-related instability would be unlikely. The Project Site is not located on a geologic unit or soil that is unstable or would become unstable as a result of the Project, resulting in an on-site or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse, and impacts would be less than significant.

d) **Less-than-Significant Impact.** Expansive soils are fine-grained soils (generally high-plasticity clays) that can undergo a significant increase in volume with an increase in water content and a significant decrease in volume with a decrease in water content. Changes in the water content of an expansive soil can result in severe distress to structures constructed upon the soil. Soils under the Project Site are classified primarily as Diablo Urban land complex, which are well-drained, silty-clay soils compounded with urban lands (NRCS 2020). A previous geotechnical investigation prepared at the Project Site in 2016 concluded that the soils onsite are considered to have a high erosion potential (District 2016). Prior to construction of the Proposed Project, the District would be required to submit a final geotechnical report for the Project along with proposed grading plans. Grading plans for the Project would be reviewed by the Division of State Architect; consistent with the CBC, the District would be required to incorporate all recommendations from the geotechnical report into the grading plans. With incorporation of the recommendations from the final geotechnical investigation, expansive soil impacts associated with implementation of the Proposed Project would be less than significant.

e) **No Impact.** Implementation of the Project would not result in any impacts regarding inadequate soils to support septic systems. O'Farrell Charter School uses the existing sewer system for the disposal of wastewater, and would not use septic tanks or alternative wastewater disposal systems. Therefore, there would be no impact.

f) **Less-than-Significant Impact.** Development of the Proposed Project would not result in any impacts to paleontological resources, as the Project Site has been significantly disturbed by previous grading activities associated with the original construction of the school campus in 1960, and again in 2016 during the construction of the high school

building and playfields. Any significant paleontological resources would have likely been disturbed or unearthed during past grading activates. Also, minimal grading into native soils would be necessary for the Proposed Project; therefore, Project-related impacts on paleontological resources would likely not occur. However, in the unlikely event that buried paleontological resources are encountered during any phase of construction, activities in the vicinity of the resources would be temporarily halted, and a qualified paleontologist would be consulted to assess the significance of the resource and to provide proper management recommendations. As such, impacts would be less than significant.

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Greenhouse Gas Emissions

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

Discussion

a) **Less-Than-Significant Impact.** Project construction activities would generate GHG emissions. Once construction activities are complete, indirect GHG emissions may be generated by the operation of the new and modernized facilities. GHGs generated from Project construction and operation could contribute to a direct, indirect, or cumulative significant impact.

The District has not yet formally adopted specific thresholds of significance with regard to GHG emissions, nor has the District adopted a qualified plan, policy, or regulation to reduce GHG emissions that qualifies for tiering in CEQA documents (per State CEQA Guidelines Section 15183.5(a)). The City of San Diego adopted a Climate Action Plan (CAP) in December 2015 that identifies measures to meet GHG reduction targets for 2020 and 2035. However, the CAP does not include emissions associated with District and school operations; therefore, the City's CAP is not an applicable plan. The District has formed a committee to discuss a range of environmental sustainability activities, projects, and policies for consideration. This committee has generated various climate change-related "Dream Big" Ideas, including developing a CAP and developing enough solar capabilities to go "off-grid" by 2025 (District 2014). No timetable for developing and adopting the CAP and other "Dream Big" ideas has been set.

Other lead agencies throughout the state have adopted or recommend mass emission thresholds for evaluating construction and operational emissions. For example, the County of San Diego currently recommends projects be compared to a 900-metric-ton carbon dioxide equivalent ($MTCO_2e$) screening level to identify which projects require additional analysis and mitigation.

Project emissions below this 900 $MTCO_2e$ level are considered less than cumulatively considerable, and project emissions above this level require additional analysis. Moreover, projects that result in a net benefit by reducing GHG emissions are determined to have a less-than-significant impact related to GHG emissions. Recent Court decisions, including the *Center for Biological Diversity et al., Plaintiffs and Respondents v. California Department of Fish and Wildlife, Defendant and Appellant; The Newhall Land and Farming Company, Real Party in Interest. No. S217763 (Newhall Ranch)*, have

recommended that analyses emphasize the consideration of GHG efficiency, and while the County guidance encourages CEQA analyses to focus on the GHG efficiency of a proposed project, the County also acknowledges that some projects are sufficiently small such that it is highly unlikely they would generate a level of GHGs that would be cumulatively considerable.

This 900 $MTCO_2e$ screening level was developed in the California Air Pollution Control Officers Association (CAPCOA) *CEQA & Climate Change* paper (CAPCOA 2008) as a theoretical basis for screening-out smaller residential and non-residential (commercial, office) uses that emit low-levels of GHG emissions from further analysis. This 900 $MTCO_2e$ screening level is based on land-use related emission sources (e.g., on-road passenger vehicles, electricity and utility consumption) that are similar to school-related emissions and is the lowest numerical threshold recommended for use by any large jurisdiction in the state[4] (AEP 2016). Accordingly, the 900 $MTCO_2e$ threshold is applicable to the Proposed Project and meets the criteria identified in the *Newhall Ranch* decision needed to analyze project-level GHG emissions (e.g., project-specific emission sources).

Project construction activities would generate GHG emissions from the operation of off-road diesel equipment exhaust and emissions from employee, material delivery, and haul truck travel over the 36-month construction period. GHG emissions during construction would be primarily generated as vehicle tailpipe emissions of primarily carbon dioxide (CO_2) from the combustion of gasoline and diesel fuel, with more limited emissions of nitrous oxide (N_2O) and methane (CH_4), as well as, other GHG emissions related to vehicle cooling systems.

Construction-related GHG emissions for the Proposed Project were estimated using CalEEMod, version 2016.3.2., for onsite equipment and EMFAC2017 for on-road haul, vendor and worker trips, using the same assumptions used in the air quality emissions analysis above (see Issue 3). Total estimated construction-related GHG emissions are shown in **Table 7**. Construction-related GHG emissions were recently quantified for a project similar to the Proposed Project, the *Muir at Anderson School Whole Site Modernization, Initial Study/Mitigated Negative Declaration* (ESA 2019), which will be referred to as the Muir project, using the same assumptions used in the air quality emissions analysis above (see Issue 3).

TABLE 7
ESTIMATED TOTAL CONSTRUCTION GHG EMISSIONS

Emission Source	Estimated CO_2e Emissions
Total Construction Emissions	595 (MT)
Annual Construction (Amortized over 30 years)	20 (MT/yr)

CO_2e= carbon dioxide equivalent; MT =metric tons; MT/yr = metric tons per year.

SOURCE: ESA CalEEMod Modeling, 2019. Appendix A.

4 Numerical thresholds adopted, proposed, or recommended throughout the state range from 1,100 $MTCO_2e$ to 100,000 $MTCO_2e$.

As shown in Table 7, the total estimated GHG emissions during construction of the Proposed Project would be approximately 595 MT of CO_2e. Consistent with the above mentioned GHG guidance, the sum of project-related GHG emissions of this previous project were amortized over a 30-year period of approximately 20 MT of CO_2e, to be added to annual operational emissions of this Project.

Project operation would generate direct and indirect operational GHG emissions from the new and modernized building facilities. Operations-related emissions were modeled for the project similar to the Proposed Project, as detailed above, using the operational model runs from the Muir project, using the same assumptions used in the air quality emissions analysis above (see Issue 3). As stated under Issue 3 and the Air Quality subsection above, the Muir project operational emissions accounted for the operations of similar, but greater new building square footage as compared to the Proposed Project. The Proposed Project would not result in an increased student capacity, therefore there would be no change in the number of vehicle trips associated with operation of the school and mobile source emissions would not change from current conditions for the Proposed Project.

The annual GHG emissions for the Proposed Project (including Project construction amortized over 30 years) are shown in **Table 8**.

TABLE 8
ESTIMATED TOTAL ANNUAL GHG EMISSIONS

Emission Source	Estimated CO_2e Emissions[1]
New Annual Operational Emissions[2]	
Area	<1 (MT/yr)
Energy[3]	43(MT/yr)
Mobile Emissions[4]	522(MT/yr)
Water and Wastewater	26 (MT/yr)
Solid Waste	2 (MT/yr)
Total Operational Annual Emissions	**592 (MT/yr)**
Annual Construction Emissions (Amortized)	20 (MT/yr)
Total Annual Emissions	**612 (MT/yr)**
Threshold	900 MT/yr
Exceeds Threshold?	**No**

1 Totals may not add exactly due to rounding

2 The prior Muir Project included removing existing emissions as existing classrooms were replaced with new project uses, but the existing uses to be replaced for the Project do not emit operational emissions so removing existing emissions was conservatively not assumed for the Project operational emissions.

3 Emissions from sources related to energy consumption including electricity and natural gas usage.

4 The Muir project operational emissions accounted for operational mobile emissions as a result of an increase in staff members and students, while as discussed above, the Project would not result in an increase in the number of enrolled students or staff members, so there would be no change in the number of vehicle trips associated with operation of the school and mobile source emissions would not change from current conditions for the Proposed Project.

CO_2e= carbon dioxide equivalent; MT =metric tons; MT/yr = metric tons per year.

SOURCE: ESA CalEEMod Modeling, 2019. Appendix A.

As shown in Table 8, the applicable estimated annual similar project-related GHG emissions (amortized construction plus operations) were calculated to be approximately 612 $MTCO_2e$, which is well below the 900 $MTCO_2e$ per year threshold described above. Therefore, the Proposed Project would not generate GHG emissions, either directly or indirectly, that may have a significant impact on the environment. This impact is considered less than significant.

b) **Less-than-Significant Impact.** As described above, the City of San Diego adopted a CAP in December 2015, which is the City's plan to reduce GHG emissions, but the CAP does not include emissions associated with District and school operations. Therefore, the most applicable plan, policy, or regulation adopted for the purpose of reducing GHG emissions are AB 32 and SB 32, which codified the state's GHG emissions reduction targets for the future. Consistent with recent juridical and legislative action, this analysis also considers the long-range (2050) reduction target outlined in Executive Order (EO) S-3-05.[5] Additionally, the analysis considers consistency with the District's "Dream Big" Ideas (District 2014), which were developed to support GHG reductions consistent with regional and statewide targets.

CARB adopted the AB 32 Scoping Plan as a framework for achieving AB 32. The Scoping Plan outlines a series of technologically feasible and cost-effective measures to reduce statewide GHG emissions. These strategies are geared toward sectors and activities that generate significant amounts of GHGs. For example, the majority of measures address building energy, waste and wastewater generation, goods movement, on-road transportation, water usage, and GHGs with high global warming potential.

Implementation of the Proposed Project would not conflict with statewide plans since it would not result in zoning or land use changes. Construction of the Project would be short-term in nature, and emissions would not exceed any proposed threshold throughout the state, including the 900 $MTCO_2e$ level referenced above. The Project replaces existing tennis and basketball courts on-site with new buildings (student union, storage building, and concession/restroom building) and modernizes some of the existing onsite buildings. The new buildings and building upgrades would reduce energy consumption, making the operation of the campus more efficient. As discussed above in Issue 8 (a), GHG operational emissions would be minimal and considerably lower than the 900 $MTCO_2e$ per year threshold identified above.

The State of California Executive Orders S-3-05 and B-30-15 establish goals to reduce GHG emissions to 40 percent below 1990 levels by 2030, and 80 percent below 1990 levels by 2050. SB 32 established the 2030 goal as law, but the 2050 goal has not yet been codified by the California Legislature. However, studies have shown that, to meet the 2030 and 2050 targets, aggressive technologies in the transportation and energy sectors, including electrification and the decarbonization of fuel, will be required. In its Climate Change Scoping Plan, CARB acknowledged that the "measures needed to meet the 2050 goal are too far in the future to define in detail." In the First Update, however,

5 EO S-3-05 establishes a goal of 80% below 1990 levels by 2050.

CARB generally described the type of activities required to achieve the 2050 target: "energy demand reduction through efficiency and activity changes; large-scale electrification of on-road vehicles, buildings, and industrial machinery; decarbonizing electricity and fuel supplies; and rapid market penetration of efficiency and clean energy technologies that requires significant efforts to deploy and scale markets for the cleanest technologies immediately." Due to the technological shifts required and the unknown parameters of the regulatory framework in 2030 and 2050, quantitatively analyzing the Project's impacts further relative to the 2030 and 2050 goals currently is speculative for purposes of CEQA.

Although the Project's operational GHG emission levels in 2030 and 2050 cannot yet be reliably quantified, statewide efforts are underway to facilitate the State's achievement of those goals and it is reasonable to expect the Project's operational GHG emission levels to decline as the CARB regulatory initiatives identified in the 2017 Scoping Plan are implemented, and other technological innovations occur. Stated differently, the Project's emissions total for 2024, the first year of operation, represents the maximum emissions inventory for the Project as California's emissions sources are being regulated (and foreseeably expected to continue to be regulated in the future) in furtherance of the State's environmental policy objectives. Given the reasonably anticipated decline in Project emissions once fully constructed and operational, the Project would be consistent with the Executive Orders' goals.

Because the Project's location, land use characteristics, and design render it consistent with statewide and regional climate change mandates, plans, policies, and recommendations, the Project would be consistent with and would not conflict with any applicable plan, policy, regulation or recommendation to reduce GHG emissions. Therefore, impacts would be less than significant.

References

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Hazards and Hazardous Materials

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
9. HAZARDS AND HAZARDOUS MATERIALS — Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☒	☐	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☒	☐	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☒	☐	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Discussion

Potentially significant impacts associated with hazardous materials were identified based on review of existing literature and previous environmental documentation for the Project Site. In October 2002, URS Corporation (URS) prepared a Phase I Environmental Site Assessment (ESA) report for proposed joint-use playfields at the Project Site (District 2013). The assessment identified the known presence of asbestos-containing materials (ACM), lead-based paint (LBP), and petroleum-impacted soil associated with a former underground storage tank (UST) (removed from the Project Site in 1988) as recognized environmental conditions.

In 2005, the site of the UST was listed as "Inactive – action required"; however, potential contaminants of concern were listed as "unspecified." According to the O'Farrell Community School Modernization and New High School Project MND (prepared in 2013), contact with the DTSC regarding the potential issues at the site revealed that review of the Phase I ESA was terminated before the site was listed "Inactive" and if future modernization or development activities at the site require DTSC review, then an

updated Phase I ESA report would need to be submitted for review and determination (District 2013).

In 2012, Ninyo & Moore conducted soil sampling and analysis in the then-proposed joint-use playfields site (located at the existing football field, baseball field, and running track in the northern portion of campus) to identify soil impacts from arsenic and organochlorine pesticides (OCPs). Arsenic, OCP dichlorodiphenyldichloroethylene (DDE) and gamma-chlordane were detected. According to the 2013 O'Farrell Community School Modernization and New High School Project MND, a human health screening evaluation estimated that the risk from DDE and gamma-chlordane in the soil was less than significant. Further, Ninyo & Moore identified concentrations of arsenic that were at or above the regional screening level at 3 feet below ground surface (bgs) on the site; however, because the affected area was limited in nature and arsenic was not present in the top 2 feet of the surface soil, which served as a protective cap, it was not considered a significant health risk. Mitigation measures were identified to ensure that the removal of soil during construction would not result in significant hazards, which included a Soil Management Plan (SMP), Community Health and Safety Plan (CHSP) and a Site-Specific Health and Safety Plan (District 2013).

Soils located at the playfield site contained arsenic concentrations that equaled the regional action level at 2 feet bgs, and arsenic concentrations above the regional level were found at a depth greater than 2 feet bgs. However, the areas of arsenic affected soils were limited in nature, and the top 2 feet of soil, were to be removed from the site and backfilled with imported soil during construction of the joint-use field. As such, in July 2014, at the start of construction, soil in the playfields was excavated to 2 feet bgs. Approximately 1,170 tons of arsenic-affected soil was disposed of under manifest as a nonhazardous waste at the Otay Landfill in Chula Vista (District 2016).

In 2016, during construction of the modernization project, Addendum Number 1 to the 2013 Final MND was prepared and adopted, as it was determined that soils that were previously identified for export would need to be reused on site (District 2016). A supplemental Phase I ESA report was prepared by Ninyo & Moore to evaluate the potential for soil re-use on site. Potentially hazardous soils were excavated and stockpiled at the location of the playfields. Samples of the stockpiled soil were tested for the presence of hazardous materials, which resulted in the presence of arsenic, gamma-chlordane, and DDE. However, concentrations of arsenic were less than DTSC ambient arsenic levels, and the calculated excess cancer risk from the concentrations of gamma-chlordane and DDE were less than the threshold cancer risk of 1 in 1 million. Therefore, the soils were determined to be suitable for onsite reuse. Because the excavated soils were at levels considered safe for onsite reuse, the District decided to reuse the soils on site, following the requirements for onsite reuse outlined in the SMP and the CHSP, instead of pursuing exportation off site (Ninyo & Moore, 2016a; 2016b). The reuse of soils on site resulted in the present-day increased elevation of the playfields, construction of a berm on the north side of campus, and construction of bioswales throughout campus.

a, b) **Less-than-Significant Impact with Mitigation Incorporated.**

Campus Modernizations

The modernization of the existing school campus would not result in a significant hazard to the environment through the use, transport, or disposal of hazardous materials, as the Project Site is currently developed, and soils samples collected in previous geotechnical investigations did not find soil contamination in these areas (Ninyo & Moore 2013; 2016).

Project construction would require the use of materials that are typically associated with construction activities, such as diesel fuels, hydraulic liquids, oils, solvents, and paints. However, any hazardous materials used on site would be removed in accordance with state and federal regulations regarding the transport, use, and storage of hazardous materials. Further, if an accident were to occur, clean up would be conducted in accordance with state and federal regulations regarding hazardous materials, including regulations under the United States Environmental Protection Agency (USEPA), Cal/OSHA, and California Department of Toxic Substances Control (DTSC). While the Project does not include demolition of buildings, if lead based materials or asbestos containing materials are identified by construction contractors during the modernization process, compliance with existing Cal/OSHA lead and asbestos regulations would be required. Potentially hazardous lead and asbestos materials would be removed in accordance with state and federal regulations.

Therefore, the proposed improvements at the school campus would not result in significant impacts regarding use, transport, or disposal of hazardous materials, and any accident conditions would be handled in compliance with applicable regulations, resulting in less than significant impacts.

Proposed Student Union and Northern Student Drop-Off and Parking Lot

As detailed above, previous geotechnical investigations at the Project Site found contamination of soils at the playfields, which included the presence of arsenic, DDE, and gamma-chlordane. As discussed above, the soil samples collected at the playfields were found to not pose a substantial risk to human health, as arsenic levels were less than the DTSC ambient arsenic level, and the calculated excess cancer risk from the concentrations of gamma chlordane and DDE was less than the threshold cancer risk of 1 in 1 million.

Although the contaminants were not considered a risk to human health, due to the proximity of the playfields to the proposed student union and northern student drop-off area and parking lot, there may be a potential to uncover contaminated soil during the grading process in the northern portion of the Project Site. As such, prior to construction of the student union and northern student drop-off and parking lot, **Mitigation Measures HAZ-1 and HAZ-2** would be required. Implementation of these measures would reduce

potential impacts related to the routine transport, use, and disposal of hazardous materials and any upset or accidental conditions to less than significant levels.

Mitigation Measures

Mitigation Measure HAZ-1: Community Health and Safety Plan (CHSP) and Site-Specific Health and Safety Plan (HASP). A CHSP and HASP shall be prepared by the District or the contractor performing the work prior to construction. The contents of the site-specific plan shall be reviewed and approved by the District prior to starting construction. The site-specific HASP shall be prepared in accordance with Federal and State Occupational Safety and Health Administration (OSHA) Hazardous Wastes Operations and Emergency Response (HAZWOPER) Standards, 29 CCR 1910.120, and 8 CCR 5192. The CHSP and the HASP will be applied during construction activities for the student union and northern parking lot and drop-off area. The procedures identified in the CHSP that could be implemented to minimize hazards during construction include but are not limited to the following.

- Evaluation of potential public exposure to hazards
- Action planning to reduce airborne concentrations if found
- Documentation of daily instrument readings
- Implementation of administrative and engineering control methods (e.g., reduce public access; prevent or minimize fugitive vapors, odors, and dust; and reduce noise and other physical hazards)
- Implementation of site security
- Daily backfill (when feasible) or fencing off of open excavations
- Use of metal, water-tight roll-off bins and multiple liners during temporary storage of stockpiled materials
- Onsite vehicle traffic tracking
- Implementation of BMPs regarding hazardous materials
- Emergency planning in case of accidental or unauthorized release
- Providing Public Notice and Proposition 65 Warning required under Section 25249.6 of the State of California Health and Safety Code

The procedures identified in the HASP that could be implemented to minimize hazards during construction include the following.

- Identify potential chemicals that may be encountered during subsurface construction activities at the site
- Provide guidelines for use of personal protective equipment based on site-specific conditions
- Provide location and directions to the nearest hospital
- Develop contingency plans in general accordance with the Federal OSHA HAZWOPER Standard (29 CFR 1910.120) and 8 CCR 5192

Mitigation Measure HAZ-2: Soil Management Plan (SMP). A SMP shall be prepared by the District or the contractor performing the work prior to construction. The objective of the SMP is to assist construction workers at the Project site with notifications of the excavation, monitoring, segregation, characterization, handling, and reuse and/or disposal (as appropriate) of wastes that may be encountered during earthwork activities in the northern portion of the Project Site. The SMP's procedures that could be implemented during construction to minimize hazards could include, but are not limited to the following.

- Periodic site inspections
- Notification for disturbance of subsurface materials
- Segregation of excavated materials that are contaminated, potentially contaminated, or clean soils/materials per Environmental Professional guidance
- Determination of soils suitable for possible on- or offsite reuse
- Stockpile management (includes implementation of BMPs and odor/vapor control measures)
- Waste characterization (involves stockpile sampling)
- Management of contaminated soil or waste transport and disposal
- Precautions in the event of encountering unknown hazardous substance
- Documentation of contaminated soils or wastes if encountered

Significance Determination: Less than significant with mitigation.

c) **Less-than-Significant Impact with Mitigation Incorporated.** The Project Site itself contains a kindergarten through twelfth grade school and any hazardous materials used during Project construction would be transported, used, and stored in accordance with state and federal regulations regarding hazardous materials. As detailed above in Issue 9 (a), the routine transport, use, or disposal of hazardous materials used on the Project Site (a school) would be conducted in accordance with state and federal regulations regarding hazardous materials. Therefore, the handling of hazardous materials within one-quarter mile of a school site would be less than significant with implementation of **Mitigation Measures HAZ-1 and HAZ-2**.

d) **Less-Than-Significant Impact.** Government Code Section 65962.5 requires the California EPA (Cal EPA) to develop an annually update the Hazardous Waste and Substances Sites (Cortese) List. According to the 2013 Final MND, potential sites of environmental concern are not located adjacent to or within approximately 2,000 feet of the Project Site, and would not be considered a "hazardous waste property" or a "border zone property", as defined by Section 25221 of the California Health and Safety Code, or a current or former "hazardous waste disposal site" or "solid waste disposal site", in accordance with 17213 of the California Education Code. The Project Site may be considered a "hazardous substance release site" as result of unauthorized release of heating/fuel oil. However, the unauthorized release was closed under regulatory oversight of the DEH after removal of the impacted contaminated soil (detailed above), and no

restrictions were placed on the closure regarding further use or development of the site as a school. Therefore, the Project Site would not create a significant hazard to the environment, and impacts would be less than significant.

e) **No Impact.** The Project Site is not within 2 miles of a public or private airport facility. Both the San Diego International Airport and the Gillespie Field are approximately 6 and 7 miles west and northeast of the Project Site, respectively. The Project Site is located within the Airport Influence Area, Review Area 2, and Airspace Protection Area of the San Diego International Airport Land Use Compatibility Plan (ALUCP) and is located within the Noise Contours Map (ALUC 2014). There are no private airstrips within the vicinity of the Project Site. The Project Site is located approximately 6.0 miles southeast of the San Diego International Airport, just within the 60-65 dB CNEL noise exposure contour of the Airport Influence Area (AIA). According to the Airport Land Use Plan for the San Diego International Airport, the Project Site would be conditionally compatible with the ALUP as school uses (with students from kindergarten through twelfth grade and including charter schools) are conditionally compatible within the exterior exposure noise contour range of 60-65 db CNEL (SDIA 2014).

The Project would largely consist of improvements to the existing campus, including demolition of the existing tennis and basketball courts and the construction of a new student union (which would include four new student classrooms) and outdoor gathering space in its place. The new student union center is anticipated to be two-stories tall, which is consistent with other buildings in the surrounding community, which would not represent an aerial hazard. In addition, the Project consists of the modification of an existing school and would not increase staff or students. Therefore, the Project would not expose people residing or working in the Project area to any safety hazards or excessive noise levels within the vicinity of a private or public airport. There would be no impact.

f) **Less-than-Significant Impact.** Emergency management services are overseen by the San Diego Fire-Rescue Department, which responds to emergencies such as earthquakes, floods, and terrorist acts. In addition, the District maintains a Natural Hazards Mitigation Plan that addresses issues related to multiple hazards, including earthquakes, floods, wildfires, landslides, and tsunamis. Current access to the Project Site for emergency vehicles is provided from both parking lots along Skyline Drive, at the parking lot along 61st Street, and a fine lane access point also along 61st Street north of the baseball field.

Construction and staging for the Project would occur on-site and would not affect traffic operations on adjacent roadways. Construction activities would not impede non-motorized travel or public transportation in the Project vicinity. During construction of the Project, heavy construction-related vehicles could interfere with emergency response to the site (e.g., slowing vehicles traveling behind the truck). However, such delays would be infrequent and brief (drivers are required to pull over to allow an emergency vehicle on-call to pass), and contract specifications for the Project would ensure that emergency vehicle access on area roadways would be maintained at all times. The Proposed Project may also require temporary sidewalk closures while repairs are

performed on existing sidewalks and Americans with Disabilities Act (ADA) ramps along the perimeter of the Project Site. However, any delays would be temporary and not considered to be significant. Temporary traffic control during construction shall meet the requirements of the California Manual on Uniform Traffic Control Devices (Caltrans 2014).

The Proposed Project would not include any alterations of existing roadway features (e.g., road realignment) that would create a permanent change to access for emergency vehicles. After construction of the Project, emergency access would improve in the northern portion of the Project Site as a result of the addition of the new parking lot along Pastor Timothy J. Winters Street. As a result, the Proposed Project would not impair or physically interfere with an emergency response, and impacts would be less than significant.

g) **Less-than-Significant Impact.** The Project Site is within a developed urban area that has not been identified as a wildland fire hazard area. According to the California Department of Forestry and Fire Protection's (CAL FIRE) Very High Fire Hazard Severity Zones (VHFHSZ) in Local Responsibility Area Map, the Project Site is not located within a fire hazard severity zone (CAL FIRE 2009). Further, all Project activities would occur within the already developed school property. Therefore, the Proposed Project would not expose people or structures directly or indirectly to a significant risk of loss, injury, or death from wildfires, and impacts would be less than significant.

References

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California Department of Transportation (Caltrans), 2014. *California Manual on Uniform Traffic Control Devices*. Updated December 9, 2015.

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San Diego Unified School District. 2013. Final Initial Study/Mitigated Negative Declaration for the O'Farrell Community School Modernization and New High School Facility Project. Draft. September.

____. 2016. Addendum No. 1 to the Final Initial Study/Negative Declaration for the O'Farrell Community School and Modernization Project. Draft. September.

Hydrology and Water Quality

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

Discussion

a, e) **Less-than-Significant Impact.** The Proposed Project includes demolition, construction, and modernization to select facilities and infrastructure at the existing school campus. During construction, exposed soil could temporarily increase the amount of sediment in runoff, which could enter the existing storm drain system. The Proposed Project would be required to obtain and comply with the Construction General Permit from the SWRCB. Stormwater best management practices (BMPs) would be required to limit erosion, minimize sedimentation, and control stormwater runoff water quality during construction activities. It is assumed that the limits of disturbance for the Proposed Project would require a Storm Water Pollution Prevention Plan (SWPPP). Compliance under the Construction General Permit and SWPPP would ensure that construction activities would not degrade the surface water quality of receiving waters to levels that would be below the standards that are considered acceptable by the San Diego Regional Water Quality Control Board (RWQCB) or other regulatory agencies. The Project Site would continue to drain into the existing municipal storm drain system within the Project Site.

Although the Project proposes to construct a new impermeable student drop-off area and parking lot in the northern portion of the Project Site, which would increase surface runoff, the increase of impermeable pavement would be nominal and would not substantially increase surface runoff into existing storm drain systems. Additionally, the Project proposes drainage repairs and improvements throughout the campus, as well as the implementation of landscaping located at the student union center and outdoor gathering space, which would re-introduce permeable features that would further reduce surface water quality impacts.

It is not anticipated the Project construction would reach excavation depths greater than 2 feet, and no impacts to groundwater quality are anticipated. Similar to existing conditions, the Project does not propose to use groundwater. As a result, impacts related to surface water or groundwater quality would be less than significant, and the Proposed Project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

b) **Less-than-Significant Impact.** The Project Site is within an established urban community that is serviced by the City of San Diego Water Utilities Department. The Project does not propose to use groundwater. Additionally, all Project improvements would occur within the existing school campus footprint, and the change in paved areas would be minimal. Therefore, the Proposed Project would not interfere with groundwater recharge such that the Proposed Project may impede sustainable groundwater management of a basin. Therefore, a less than significant impact would occur related to a decrease in groundwater supplies or groundwater recharge.

c, i) **Less-than-Significant Impact.** Construction of the Proposed Project would include ground disturbing activities in order to construct and modernize school facilities. These activities could temporarily alter the ground surface, consequently altering drainage patterns. Altered drainage patterns have the potential to result in erosion or sedimentation on or offsite by redirecting or concentrating flows on-site. However, as described above in Issue 10 (a), the Proposed Project would be required to comply with the Construction General Permit and a SWPPP. BMPs would be implemented to minimize sedimentation at the Project Site. After the completion of construction, the ground surface would have similar amounts of pervious and impervious surfaces. Drainage within the Project Site would continue to be serviced by the existing storm drain system. Additionally, no stream or river courses exist within the site vicinity that could be affected by the Proposed Project. Therefore, impacts on the existing drainage pattern regarding siltation or erosion on- or off-site would be less than significant.

c, ii) **Less-than-Significant Impact.** As previously discussed above, construction of the Proposed Project could temporarily alter the ground surface, consequently altering the drainage pattern. Altered drainage patterns have the potential to result in increased runoff, which could result in flooding on or offsite. However, as described above in Issue 10 (a), the Proposed Project would be required to comply with the Construction General Permit and a SWPPP. BMPs would be implemented to minimize runoff at the Project Site,

which in turn would minimize flooding. After the completion of construction, the ground surface across the Project Site would be similar to existing conditions. Drainage within the Project Site would continue to be serviced by the existing storm drain system. Therefore, impacts on the existing drainage pattern regarding runoff in a manner that would result in flooding on- or off-site would be less than significant.

c, iii) **Less-than-Significant Impact.** See discussion under Issue 10 (c)(i) and (ii), above. Construction of the Proposed Project would not result in significant impacts on the existing drainage pattern due to implementation of BMPs that would minimize flooding and runoff. After the completion of construction, drainage patterns would be similar to existing conditions. Drainage for the Project Site would continue to be serviced by the existing storm drain system. Therefore, impacts related to runoff exceeding the drainage system capacity would be less than significant.

c, iv) **No Impact.** The Project Site is not within a 100-year flood hazard area, as mapped on Federal Emergency Management Agency's (FEMA) Flood Insurance Rate Map (FEMA 2020). Therefore, the Proposed Project would not impede or redirect flows, and there would be no impact.

d) **No Impact.** The Project Site is located approximately 3.6 miles northeast of the San Diego Harbor and 7.5 miles from the Pacific Ocean. According to the California Emergency Management Agency's Tsunami Inundation Map, the Project Site is not in an affected USGS Quadrangle (CEMA 2009). In addition, the Project Site is not located near a body of water, and therefore not at risk by seiche. As previously discussed, the Project Site is not within a 100-year flood hazard area, as mapped on FEMA's Flood Insurance Rate Map (FEMA 2020). As a result, there would be no impact regarding risks from seiche, tsunami, or flood hazards that would risk or release pollutants due to inundation.

References

California Emergency Management Agency (CEMA). 2009. Tsunami Inundation Map for Emergency Planning: National City Quadrangle. Available at https://www.conservation.ca.gov/cgs/tsunami/maps/san-diego.

Federal Emergency Management Agency (FEMA). 2020. Flood Insurance Rate Map. Available at https://hazards-fema.maps.arcgis.com/apps/webappviewer/index.html Accessed July 2, 2020.

Land Use and Land Use Planning

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

Discussion

a) **No Impact.** The Proposed Project would occur within the existing boundaries of the school campus. Therefore, implementation of the Proposed Project would not physically divide an established community, and no impact would occur.

b) **No Impact.** The Proposed Project is consistent with the City's General Plan land use designation (Institutional & Public and Semi-Public Facilities). By state law, school facilities can be exempted from local zoning ordinances consistent with California Government Code Section 53094. Additionally, the Proposed Project would not result in any changes to the existing land use at the Project Site, as operations would be consistent to that of the existing campus. No habitat conservation plans or natural community conservation plans are in place or applicable to the Project Site or vicinity. No components of the Proposed Project would have the potential to conflict with adjacent land uses, and therefore, no impacts would occur.

Mineral Resources

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

Discussion

a, b) **No Impact.** The Project Site is in Mineral Resource Zone (MRZ) 3, as identified in the Conservation Element of the City of San Diego's General Plan (City of San Diego 2008). MRZ-3 areas contain known mineral deposits that may qualify as mineral resources. However, the Proposed Project involves improvements of an existing school site; no mineral extraction or other mining operations occur within the Project Site. In addition, the District does not intend to remove the school; therefore, the Project Site would not be available for mineral extraction activities in the future. The Proposed Project would not result in the loss of availability of known mineral resource that would be of value to the region and the residents of the state, or result in the loss of a mineral resource recovery site. Therefore, there would be no impact on mineral resources.

References

City of San Diego, 2008. City of San Diego General Plan, Conservation Element. Available at https://www.sandiego.gov/sites/default/files/legacy//planning/genplan/pdf/2012/ce120100.pdf. Accessed July 2019.

Noise

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

Discussion

a) **Less-Than-Significant Impact.** Project construction would generate noise from the daytime operation of construction equipment on the Project Site and from haul truck trips on local roadways accessing and departing the Project Site. Project construction activities would be subject to the City's Municipal Code Section 59.5.0404, which limits noise-generating construction activity to between the hours of 7:00 a.m. and 7:00 p.m., Monday through Saturday. Within these permitted hours, it is unlawful for construction activity to cause a 12-hour average noise level (L_{eq}) greater than 75 dBA at any property zoned residential.

The Project Site is located within a residential neighborhood, with residences along the streets that surround the Project Site (Pastor Timothy J. Winters Street to the north, Skyline Drive to the south, Lolly Lane, Kimmy Court and Henson Street to the east and South 61st Street to the West) and two churches (Bayview Baptist Church to the north across Pastor Timothy J Winters Street and Maranha Seventh-Day Adventist Church to the south across Skyline Drive). Operation of school facilities (both existing facilities and those proposed by the Project) place students within the Project Site, when school is in session. The adjacent offsite residences and churches, as well as the school itself, are considered sensitive noise receptors for the purposes of this noise analysis.

Operational noise within the City is governed by the City's Municipal Code Section 59.5.0401, which establishes the allowable noise limits at the property boundaries for different land use zones, as summarized in **Table 9**.

TABLE 9
CITY OF SAN DIEGO NOISE LIMITS

Receiving Land Use	Daytime 7 a.m.–7 p.m. (dBA L_{eq})	Evening 7 p.m.–10 p.m. (dBA L_{eq})	Nighttime 10 p.m.–7 a.m. (dBA L_{eq})
Single-family residential	50	45	40
Multi-family residential	55	50	45
All other residential	60	55	50
Commercial	65	60	60
Industrial or agricultural	75	75	75

NOTES: dBA = A-weighted sound level, the sound pressure level in decibels as measured using the A weighting filter network, which de-emphasizes the very low- and very high-frequency components of the sound in a manner similar to the frequency response of the human ear; L_{eq} = equivalent sound level, the average of the sound energy occurring over the measurement period.

The operational noise level limits identified in Table 9 refer to the 1-hour average or L_{eq}. In the event that the noise standards are assessed on a boundary between two land uses, the applicable noise limits are the arithmetic mean of the respective limits for the two land uses. Both the Project Site and the closest residential noise-sensitive receptors are zoned single-family residential, and therefore, the single-family residential noise limits presented in Table 9 would apply.

Existing Conditions

To characterize the existing ambient noise levels at the nearest residences surrounding the Project Site, recent noise measurements previously conducted by ESA for a similar recent District Initial Study/MND, *Muir at Anderson School Whole Site Modernization Project Final Mitigated Negative Declaration*, were utilized for the Proposed Project (District 2019). While the Muir at Anderson School does not have a football field, it does have a large soccer field and is located adjacent to an active use park complete with three baseball fields. Both Muir at Anderson School and the Project Site are located within a single-family residential neighborhood, with the residences located along the residential collector streets that surround the Project Site. Therefore, the previously measured daytime ambient noise levels (with operational school activities occurring) would be similar for the Project with similar suburban environments (an elementary school located adjacent to residences in established urban/suburban San Diego neighborhoods). At the time of this analysis, students are working remotely from home due to the Coronavirus pandemic. Students will return to the campus and neighborhood traffic patterns (and associated noise conditions) will return to previous conditions when District schools and businesses open again.

Construction Impacts

Project construction would generate noise primarily within the Project Site and to a lesser extent on adjacent roadways and surrounding uses. Construction workers would commute daily to the site, and trucks transporting equipment and materials to the site would incrementally add minimal traffic to the existing traffic volume on roadways on weekday mornings and afternoons. This would result in a negligible increase in noise levels on

access roads to the Project Site during this commute period, as traffic volumes would have to double to result in a 3 dBA increase, which would be barely perceptible. However, the equipment and materials delivery by truck would generate a relatively higher peak noise level on roadways during site access than commute traffic, which could cause an intermittent short-term noise nuisance (e.g., passing trucks at 50 feet would generate up to 76 dBA Lmax). However, the Project's contribution of construction traffic noise to existing roadway traffic noise levels averaged over a 24-hour period (i.e., Community Noise Equivalent Level [CNEL]) would be low due to the infrequent Project traffic volume. Therefore, short-term construction-related impacts associated with commuting workers and transporting equipment to the Project Site would be less than significant based on the City's Municipal Code Section 59.5.0404.

Project construction would generate noise from the use of heavy construction equipment on-site for the construction activities of demolition, site preparation, grading, building construction, paving, landscaping, and finishing activities and would occur in three phases: Phase 1 – Construction of Portable Classrooms/Interim Housing, Phase 2 – Whole Site Improvements and Phase 3 – Construction of the Student Union (see Chapter 2, Project Description, for additional details). Construction-related noise was quantified for the Muir project. The assumptions and methodology as it relates to construction efforts that was used in the prior analysis are similar to those that would be used for the Proposed Project. The proposed Project is anticipated to require similar, but no greater than the peak daily construction equipment, workers, haul and vendor trucks trips as the Muir project. Therefore, the use of the previous noise modeling output is appropriate for the Proposed Project. Based on the anticipated types and quantities of equipment needed for each construction activity, **Table 10** presents the hourly average construction phase noise levels (dBA L_{eq}) attenuated by closest distance (25 feet) from the construction phase activity to the nearby noise-sensitive receivers (i.e., the off-site residences along the streets surrounding the Project Site, the two churches across the street from the Project Site, and the on-site students in buildings and recess areas).

TABLE 10
PREDICTED CONSTRUCTION NOISE LEVELS AT NEARBY SENSITIVE-RECEIVERS

Construction Phase	Distance from Project Property Line (feet)	Estimated Construction Noise Level (Leq, dBA)
Demolition	25	84
Site Preparation	25	87
Grading	25	87
Building Construction	25	81
Paving	25	81
Architectural Coating	25	62
Building Construction + Architectural Coating + Paving	25	84
Maximum Noise Level	25	**87**

SOURCE: ESA 2020

As shown in Table 10, the estimated construction noise levels at the closest residential property line range from 62 to 87 dBA L_{eq}, depending upon each construction phase and its construction activities.

Project construction would be subject to the allowable construction hours and construction noise level limits of the City of San Diego Municipal Code Noise Ordinance, which states that:

> *Temporary construction noise which exceeds 75 dB(A) Leq at a sensitive receptor would be considered significant. Construction noise levels measured at or beyond the property line of any property zoned residential shall not exceed an average sound level greater than 75-decibels (dB) during the 12-hour period from 7:00 a.m. to 7:00 p.m. In addition, construction activity is prohibited between the hours of 7:00 p.m. of any day and 7:00 a.m. of the following day, or on legal holidays as specified in Section 21.04 of the San Diego Municipal Code, with the exception of Columbus Day and Washington's Birthday, or on Sundays, that would create disturbing, excessive, or offensive noise unless a permit has been applied for and granted beforehand by the Noise Abatement and Control Administration, in conformance with San Diego Municipal Code Section 59.5.0404.*

As shown in Table 10, Project construction noise levels would range from 62 to 87 dBA Leq, which at nearby residences would potentially exceed the City's construction average sound level limit of 75 dBA Leq during the 12-hour period from 7:00 a.m. to 7:00 p.m. at or beyond the property line of any property zoned residential. Therefore, impacts related to construction noise would be potentially significant.

Prior to construction, it is a District best practice to send construction notices to the families of all enrolled students, the Mayor's office, local City councilmembers, local community planning group, and immediate campus neighbors, which may assist in allowing receptors to avoid peak construction noise periods. In addition, and in order to reduce impacts, the Project would be required to implement the **Mitigation Measure NOI-1**, as described below, during construction activities, which would include noise reduction measures such as equipping construction equipment with properly operating and maintained muffler exhaust systems, locating noise equipment as far as possible from noise sensitive receptors, and implementing temporary noise barriers at construction noise sources.

Implementation of Mitigation Measure NOI-1 (which includes temporary noise barriers) would reduce construction noise levels at the source by up to 15 dBA Leq, thereby, reducing the estimated construction noise levels of approximately 62 to 87 dBA Leq at residences to approximately 47 to 72 dBA Leq, which would be below the City's construction average sound level limit of 75 dBA Leq during the 12-hour period from 7:00 a.m. to 7:00 p.m. at or beyond the property line of any property zoned residential. Therefore, noise impacts to residences would be less than significant.

In addition, school classroom buildings on-site would be as close as approximately 25 feet to Project construction activities, therefore, the construction noise would have comparable distance for attenuation, as experienced for the off-site residential properties. Project construction activities would determine when and where the construction activities would occur on-site, and whether school would be in or out of session. The active construction area would be isolated at distance from active classrooms. Construction noise levels at a reference distance of 25 feet would result in a maximum average noise level of approximately 87 dBA Leq. Note, the City's construction noise level limit of the 75 dBA Leq of the Noise Ordinance is applicable only to residential property lines, not schools; however, implementation of Mitigation Measure NOI-1 would implement temporary noise barriers between the noise source and classroom, which would reduce construction noise levels by up to 15 dBA to occupied classrooms (where students are studying) to less than the City's construction noise level limit, resulting in a less than significant impact.

Operation Impacts

As described above, while the Project would increase the school's number of classrooms, the increase would serve the existing student capacity and would not result in an increase in the number of enrolled students and staff; thereby, there would be no increase in vehicle trips to the Project Site and no increase in vehicle traffic on area roadways. Therefore, the off-site traffic noise impact associated with vehicular traffic of the Proposed Project would be less than significant.

Operation of the Proposed Project would include the operation of on-site stationary noise sources, including HVAC units on the new building and modernized buildings. The operation of HVAC equipment would be the primary operational noise source on-site associated with the proposed modernization improvements. Noise levels from HVAC equipment vary significantly depending on unit efficiency, size, and location but generally average from 45 dBA to 70 dBA L_{eq} at 3 feet (USEPA 1971). However, HVAC noise levels are typically attenuated by design, baffling, enclosures, barriers and distance. Section 59.5.0401 of the City of San Diego Noise Ordinance prohibits the 1-hour average sound level from exceeding the applicable limits at any location in the City of San Diego on or beyond the boundaries of the property on which the noise is produced. However, the Project would comply with the City Noise Ordinance by designing and locating HVAC units to provide sufficient baffling, barriers, and distance such that the noise level from HVAC units and generators would be less than 45 dBA L_{eq} at the property line. Therefore, impacts would be less than significant related to operation of the new student union, modernized buildings and new parking lot and drop-off area north of the football field and improved kindergarten through eighth grade parking lot.

Mitigation Measures:

NOI-1: Construction Noise. The following construction equipment techniques shall be implemented by the construction contractor to reduce construction-related noise at nearby noise-sensitive receivers:

a. Construction contractor(s) shall ensure proper maintenance and working order of construction equipment and vehicles, and all construction equipment shall be equipped with manufacturers-approved mufflers and baffles.

b. Construction contractor(s) shall use quieter equipment as opposed to noisier equipment (such as rubber-tired equipment rather than track equipment), when feasible. Noisy equipment shall be switched off when not in use.

c. Construction activities shall be scheduled to avoid operating several pieces of equipment simultaneously, which causes high noise levels, to the extent feasible.

d. The construction contractor(s) shall place all stationary construction equipment so that emitted noise is directed away from sensitive receivers nearest the Project Site.

e. Temporary noise barriers or noise blankets shall be placed to block the line-of-sight between construction equipment operation and the offsite noise-sensitive receivers including the adjacent residences (backyards) to the east along Lolly Lane, Kimmy Court and Henson Street, and the residences to the north, south and west across and Pastor Timothy J. Winters Street, Skyline Drive to the south, and South 61st Street to the west, respectively, during Project construction. Temporary noise barriers or noise blankets shall be installed on temporary construction fencing and must be capable of achieving sound level reductions of at least 15 dBA to block the line-of-sight between construction equipment operations and the offsite noise-sensitive receivers.

b) **Less-than–Significant Impact with Mitigation Incorporated.** During Project construction, the operation of typical heavy construction equipment for demolition of buildings and pavement, earth-moving activities (excavation and grading), construction of new buildings and parking lot, modernization of buildings, and site improvements would generate localized vibration levels, which, depending upon distance, could potentially affect structures and/or annoy people. Heavy impact machinery, such as pile drivers, that could result in excessive vibration conditions, would not be used.

Construction vibration analyses are typically conducted for potential structural damage to buildings, and annoyance to humans in inhabited structures. The closest structures to the construction activities on the Project Site would be the existing portable classrooms within 25 feet of the proposed new student union building and all the existing school buildings (classrooms, library, cafeteria, administration) within the kindergarten through eighth grade portion of campus that are adjacent to various other existing school buildings within the kindergarten through eighth grade portion of campus that are all to be modernized. The closest off-site structures would be residential structures approximately 25 feet from the Project Site property line to the east along Lolly Lane,

Kimmy Court and Henson Street, all other off-site receptors are located further away and would be exposed to substantially less vibration levels.

Construction vibration would have a significant impact if:

- Project construction activities cause groundborne vibration levels to exceed the building damage threshold of 0.2 inches per second (in/sec) peak particle velocity (PPV) for Building Category III Non-engineered timber and masonry buildings (FTA 2018), or 0.3 in/sec PPV structural damage threshold for Building Category II engineered concrete and masonry (no plaster) buildings (FTA 2018); and
- Project construction activities cause groundborne vibration levels to exceed the human annoyance threshold of 80 VdB at Land Use Category 2 – Residences, and 83 VdB at Land Use Category 3 – Institutional, primarily day use (FTA 2018).

The vibration levels generated by the operation of the heavy-duty construction equipment during the construction of the Proposed Project are identified in **Table 11,** in terms of PPV, expressed in/sec, and root mean square (RMS) velocity, expressed in VdB. As shown in Table 11, depending on the type of construction equipment used, vibration velocities could reach as high as approximately 0.210 in/sec PPV at 25 feet from the source (e.g., vibratory roller), which corresponds to a RMS velocity level of 94 VdB at 25 feet from the source.

TABLE 11
VIBRATION SOURCE LEVELS FOR CONSTRUCTION EQUIPMENT

Equipment	Approximate PPV (in/sec) at 25 feet	Approximate RMS (VdB) at 25 feet
Vibratory Roller	0.210	94
Large Bulldozer	0.089	87
Loaded Trucks	0.076	86
Jackhammer	0.035	79
Small Bulldozer	0.003	58

SOURCE: FTA 2018.

As shown in Table 11, operation of a vibratory roller (used in soil compaction for paving parking lots) would generate vibration levels that would have the potential to exceed the building damage threshold of 0.2 in/sec PPV, if operated within approximately 25 feet or less. Other heavy equipment generates vibration levels at less than half of the vibratory roller at 25 feet would not have the potential to exceed the building damage threshold of 0.2 in/sec PPV.

Structural Damage Analysis

The off-site structures closest to the Project Site boundary (residences to the east) are conservatively considered as non-engineered timber and masonry building, located approximately 25 feet from the boundary. Project components to be constructed in the

eastern part of the Project Site closest to these receptors include the new student union and outdoor gathering space. Operation of a vibratory roller within 25 feet would potentially exceed the 0.2 in/sec PPV structural damage threshold. Therefore, the vibration impact to residential structures from Project construction would be potentially significant requiring mitigation. At 50 feet, the equipment operation would not exceed the structural damage threshold.

The existing structures located on-site (classrooms, administration buildings, etc.) would be located near operating construction equipment during construction of the new student union and outdoor gathering area, as well as modernization improvements to all buildings on the kindergarten through eighth grade portion of campus. Operation of a vibratory roller within 25 feet would potentially exceed the 0.2 in/sec PPV structural damage threshold for Building Category III Non-engineered timber and masonry buildings (FTA 2018). Therefore, the vibration structural damage impact to on-site structures from Project construction would be potentially significant, and **Mitigation Measure NOI-2** would be required to be implemented, as detailed further below.

Human Annoyance Analysis

Construction vibration could annoy people within a nearby building. The vibration impact threshold for human annoyance at a residential structure is 80 VdB at Land Use Category 2 – Residences, infrequent use and 83 VdB at Land Use Category 3 – Institutional, infrequent use (FTA 2018). As shown in Table 11, at 25 feet, the vibration generated by the operation of a vibratory roller (94 VdB), a large bulldozer (87 VdB), or a loaded haul truck (86 VdB) would exceed the residential human annoyance threshold of 80 VdB. Therefore, the operation of this equipment on-site along the Project Site boundary would exceed the vibration threshold of human annoyance at the off-site inhabited residences approximately 25 feet away resulting in a potential significant impact. At 80 feet, operation of the vibratory roller, large bulldozer, and loaded haul truck would not exceed the human annoyance threshold of 80 VdB.

On-site, construction vibration from the operation of this equipment near on-site structures (inhabited school buildings) could potentially annoy people (students and teachers) within a building in proximity to the construction activities. The structures located on-site (classrooms, administration buildings, etc.) would be potentially located near the operation of the Project construction equipment during construction of the new student union and outdoor gathering area, as well as modernization improvements to all buildings on the kindergarten through eighth grade portion of campus. As shown in Table 11, the vibration generated by the operation of a vibratory roller, a large bulldozer, or a loaded haul truck at 25 feet would potentially exceed the human annoyance thresholds of 83 VdB, potentially resulting in a significant impact. Therefore, the Proposed Project would be required to implement **Mitigation Measure NOI-2** related to vibration-generating monitoring, as further detailed below.

With implementation of Mitigation Measure NOI-2, impacts would be reduced to less than significant. Therefore, the Project would not result in construction vibration-related structural damage and human annoyance impacts.

Mitigation Measures:

NOI-2: Construction Vibration. The following construction equipment techniques shall be implemented by the construction contractor to reduce construction-related vibration at nearby noise-sensitive receivers. The construction contractor(s) shall review all construction activity for potential vibration-generating activities from demolition, paving, and construction within 80 feet of existing inhabited buildings, and shall require site-specific vibration studies to be conducted to determine the area of impact and to identify appropriate construction techniques to reduce vibration velocities to levels not exceeding the human annoyance threshold of 80 VdB. The studies shall, at a minimum, include the following:

- Identification of the Project's vibration-generating activities that have the potential to generate ground-borne vibration;
- A vibration monitoring and construction contingency plan to identify structures where monitoring would be conducted;
- Maintain a monitoring log of vibrations during initial demolition activities. Monitoring results may indicate the need for a more or less intensive measurement schedule; and
- Vibration level limits for suspension of construction activities and implementation of contingencies to lower vibration levels.

Significance Determination: Less than significant with mitigation.

c) **No Impact.** The Project Site is not located within the vicinity of a private airstrip; however, the Project Site is located within the Airport Influence Area, Review Area 2, and Airspace Protection Area of the San Diego International Airport Land Use Compatibility Plan (ALUCP) (San Diego County Airport Land Use Commission 2014) and is located within the Noise Contours Map. The Project Site is located approximately 6 miles southeast of the San Diego International Airport, just within the 60-65 dB CNEL noise exposure contour of the Airport Influence Area (AIA). According to the Airport Land Use Plan for the San Diego International Airport, the Project Site would be conditionally compatible with the ALUP as school uses (with students from kindergarten through twelfth grade and including charter schools) are conditionally compatible within the exterior exposure noise contour range of 60-65 db CNEL (SDIA 2014). In addition, the Project consists of the modification of an existing school and would not increase staff or students. Therefore, the Project would not expose people residing or working in the Project area to excessive noise levels within the vicinity of a private or public airport. Impacts would be less than significant.

References

California Department of Transportation (Caltrans), *Technical Noise Supplement* (TeNS). September, 2013.

City of San Diego, *City of San Diego General Plan*, Adopted March 10, 2008. Updated June, 2015. (Note: referenced as [2008] 2015 in text)

———, City of San Diego Municipal Code, Article 9.5, Noise Abatement and Control. June, 2000.

Environmental Science Associates (ESA), *Franklin Elementary School Whole Site Modernization, Initial Study/Mitigated Negative Declaration*. 2019.

Federal Transportation Administration (FTA), *Transit Noise and Vibration Impact Assessment Manual,* September 2018.

San Diego County Airport Land Use Commission, San Diego International Airport Land Use Compatibility Plan, Factor Maps and Matrices, Airport Influence Area, Review Area 2, May 2014.

Population and Housing

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

Discussion

a) **No Impact.** The Project Site is within an existing school property in a built-out urbanized community. The proposed activities do not include new homes or businesses, and would not result in the extension of public roads or other infrastructure. The proposed modernization improvements would not increase the amount of new students or staff present on site, but would rather provide infrastructure improvements to serve the existing student capacity. As such, the Project would not contribute to a substantial increase in unplanned population growth, and no impact would occur.

b) **No Impact.** The Project Site is within an existing school property in a built-out, urbanized community. No housing exists on the Project Site, and therefore the Proposed Project would not displace a substantial number of existing housing units or people, necessitating the construction of replacement housing elsewhere. Therefore, impacts associated with these issues would not occur.

Public Services

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
15. PUBLIC SERVICES — Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered government 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 following public services:				
i) Fire protection?	☐	☐	☐	☒
ii) Police protection?	☐	☐	☐	☒
iii) Schools?	☐	☐	☐	☒
iv) Parks?	☐	☐	☐	☒
v) Other public facilities?	☐	☐	☐	☒

Discussion

a) **No Impact.**

i) The Project Site is currently served by the San Diego Fire Department (SDFD). The SDFD responds from 51 stations in the City of San Diego and the closest station to the Project Site is located 0.3 miles north at 6135 Imperial Avenue. Implementation of the Proposed Project would serve the existing student body. No new staff or student enrollment would result from implementation of the Project. As such, the Proposed Project would not induce population growth directly or indirectly that could increase the demand for fire protection services at the Project Site. Further, the Project Site is an existing school where fire protection services are already adequately provided. The Proposed Project would maintain adequate access to the site Project Site during construction, and further improve emergency access to the Project Site through the construction of the new student drop-off area and parking lot along Pastor Timothy J. Winters Street. As such, fire protection would not be significantly altered through implementation of the Proposed Project, and no impact would occur.

ii) The Project Site is currently serviced by the San Diego Police Department. The closest police station to the Project Site is the Southeastern Division, located 1.4 miles east at 7222 Skyline Drive. As previously detailed, while the Project would increase the number of classrooms, no new staff or student enrollment would result from implementation of the Project. Therefore, the Proposed Project would not result in a direct or indirect increase in population that would contribute to substantial

adverse physical impacts associated with police protection. As such, there would be no impact.

iii) The Project Site is located on an existing school campus. As previously detailed, no student capacity increase would result from implementation of the Project. No additional schools would be required by the Proposed Project. Therefore, the Project would not result in substantial adverse physical impacts associated with the need for new or physically altered school facilities. As such, no impact would occur

iv) As previously mentioned, the Proposed Project would not affect operations at the existing school campus. No additional parks would be required by the Proposed Project. The Project includes construction of recreational facilities such as new volleyball and tennis courts, a turf field, and an outdoor recreational area, which would provide for new recreational opportunities for the campus. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the need for new or physically altered park facilities, and no impact would occur.

v) As previously mentioned, no new staff or student enrollment would result from implementation of the Project. No additional public services would be required by the Proposed Project. Therefore, the Proposed Project would not result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities. As such, no impacts would occur.

Recreation

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

Discussion

a, b) **Less-than-Significant Impact.** In addition to the existing recreational facilities on the Project Site itself (e.g., football field, baseball field, playground equipment), Martin Luther King Jr. Recreation Center and Memorial Park is located approximately 1,200 feet southeast, and is the closest recreational facility to the Project Site. The Kennedy Neighborhood Park is the second closest public park facility to the Project Site, approximately 1.5 miles to the southwest.

While the Proposed Project would increase the school's number of classrooms, no new staff or student enrollment would result from implementation of the Project, as the Project would serve the existing student capacity. As such, the Proposed Project would not increase the use of existing recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated. Additionally, new recreational facilities would be provided within the Project Site to serve the students, including new volleyball and basketball courts and an outdoor recreation area. However, these impacts are analyzed throughout this Initial Study/MND for adverse physical effects on the environment. With implementation of mitigation measures mentioned throughout this document, the Project's proposed recreational facilities would not have an adverse physical effect on the environment, and impacts would be less than significant.

Transportation

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION — Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? ?	☐	☐	☒	☐
b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☒	☐	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

The discussion of impacts related to transportation provided below is based on a transportation study prepared for the Proposed Project, which is provided in Appendix C of the Initial Study (LLG, 2020).

Discussion

a) **Less-than-Significant Impact.** The Project Site is located in the Encanto Neighborhoods community in the southern portion of the city of San Diego. Regional access to the Project Site is provided by I-805, approximately 1.6 miles to the west of the Project Site and SR 94, approximately 1.3 miles northwest of the Project Site. Local access is provided by Skyline Drive to the south, Imperial Avenue to the north, and Valencia Parkway to the west. The Project site is bound to the north by three residential homes and Pastor Timothy J. Winters Street, to the west by 61st Street, to the south by Skyline Drive, and to the east by single-family residences (see Figure 2). An additional access fire lane is located directly north of the baseball field to allow emergency vehicle access across the northern half of the Project Site.

Construction is expected to occur between 7:00 a.m. and 7:00 p.m., Monday through Friday (sometimes Saturday), and would comply with the City of San Diego Municipal Code limits regarding construction activity (Municipal Code Section 59.5.0404). No nighttime construction would occur. The modernization improvements are scheduled to begin in early 2021.

Local Roadways

During the construction period, construction vehicles would use the roadways that surround the Project Site to deliver materials and haul waste. Workers' vehicles and construction vehicles could access the site from the above-mentioned local streets. Roadway users could experience temporary delays from material deliveries, but these delays would be both brief and infrequent. Therefore, they would not affect overall traffic circulation in

the Project vicinity. Construction staging would occur on-site and would not affect traffic operations on adjacent roadways. Construction activities would not impede non-motorized travel or public transportation in the Project vicinity. The Proposed Project could, however, require temporary sidewalk closures while repairs are performed on existing sidewalks and Americans with Disabilities Act (ADA) ramps along the perimeter of the Project Site. However, any delays would be temporary and not considered to be significant. Temporary traffic control during construction shall meet the requirements of the California Manual on Uniform Traffic Control Devices (Caltrans 2014).

As proposed, Project modernization would not conflict with any applicable plans, ordinances, or policies establishing measures for effectiveness of the performance of the circulation system, such as the Encanto Neighborhoods Community Plan Mobility Element, or the San Diego Metropolitan Transit System (MTS) ordinances. As previously noted, no staff or student enrollment increases would occur and therefore no additional trips to and from the Project Site would be generated during operation. In accordance with the City's Local Mobility Analysis (LMA) requirements, a LMA is not warranted (City of San Diego 2020). The Proposed Project would conform to the Encanto Neighborhoods Community Plan Mobility Element and would not generate more than 1,000 average daily trips. Therefore, the Proposed Project would not substantially degrade traffic operations or roadways in the Project vicinity, nor would it impede non-motorized travel or public transportation. As such, impacts would be less than significant.

Congestion Management Program Facilities

State Proposition 111, passed by voters in 1990, established a requirement that urbanized areas prepare and regularly update a Congestion Management Program (CMP). Although the SANDAG provided regular updates for the state CMP from 1991 through 2008, the San Diego region elected to opt out of (be exempt from) the state CMP in October 2009. As such, there is no relevance of the Proposed Project to potential conflicts with an applicable CMP, and no impact would occur.

Transit, Bicycle, and Pedestrian Facilities

The Project Site area is served directly by MTS Route 12. Route 12 runs between Paradise Valley Road and Meadowbrook Drive to City College Transit Center. The bus service on this route is provided from 5:34 a.m. from starting at the City College Transit Center and 4:29 a.m. starting from Paradise Valley Road and Meadowbrook Drive. Buses arrive at 15 to 20 minute intervals throughout the AM and PM peak traffic (MTS 2019).

Class II bicycle facilities (bike lanes) are provided in both travel directions on Skyline Drive; there are no other classified bicycle facilities near the Project Site. Overall, sidewalks are provided adjacent to the Project Site except for south side of the Pastor Timothy J Winters Street from Jenna Court to about 500 feet to the west near the school property line. A flashing beacon pedestrian crossing is provided across 61st Street at Flipper Drive.

The Proposed Project would not directly or indirectly eliminate alternative transportation corridors or facilities (e.g., bus stops). In addition, the Proposed Project would not preclude increased alternative transportation services. Therefore, the Proposed Project would not conflict with adopted policies, plans, or programs supporting alternative transportation. As mentioned above, the Proposed Project would not impede non-motorized travel or public transportation in the Project vicinity; it would not decrease the performance or safety of such facilities. As a result, impacts would be less than significant.

b) **Less-than-Significant Impact**. In accordance with Senate Bill (SB) 743, the CEQA Guidelines Section 15064.3, subdivision (b) was adopted in December 2018 by the California Natural Resources Agency. These revisions to the CEQA Guidelines criteria for determining the significance of transportation impacts are primarily focused on projects within transit priority areas, and shifts the focus from driver delay to reduction of greenhouse gas emissions, creation of multimodal networks, and promotion of a mix of land uses. Vehicle miles traveled, or VMT, is a measure of the total number of miles driven to or from a development and is sometimes expressed as an average per trip or per person.

The newly adopted guidance provides that a lead agency may elect to be governed by the provisions of this section immediately. Beginning on July 1, 2020, the provisions of this section shall apply statewide. The City published its draft *Transportation Study Manual* (TSM) in June 2020, which updated transportation significance thresholds and transportation impact analysis procedures. Therefore, the TSM was used to determine the significance of transportation impacts.

According to the TSM, a detailed transportation VMT analysis is required for all land development projects, except those that meet one of eight designated screening criteria. A project that meets at least one of the screening criteria would be presumed to result in a less-than- significant VMT impact due to the Project characteristics and/or location. The Proposed Project would meet Criterion 3 – Small Projects, which states that projects generating less than 300 daily unadjusted driveway trips using the City's trip generation rates/procedures would result in a less-than-significant VMT impact. While the Proposed Project would create additional student capacity to serve the existing student body, it would not provide for new enrollment. Therefore, no new vehicle trips would be generated, and the Proposed Project would result in a less-than-significant impact related to CEQA Guidelines Section 15064.3.

c) **Less-than-Significant Impact with Mitigation Incorporated.** An impact would occur if the Project substantially increases roadway hazards due to a geometric design feature or the introduction of incompatible uses (i.e., farming equipment). The Project Site includes three existing surface parking lots, including one located in the central portion of campus accessed from 61st Street, which includes a student drop-off lane, seven general use parking spaces, 28 staff spaces, and three ADA spaces (for a total of 38 parking spaces). The remaining two surface parking lots are both accessible from Skyline Drive via a one-

way entrance and one-way exit driveway, with the kindergarten through eighth grade parking lot located parallel to Skyline Drive and the high school parking lot perpendicular to Skyline Drive. The kindergarten through eighth grade parking lot includes 104 general use parking spaces and four ADA spaces (for a total of 108 parking spaces), and the high school parking lot includes a drop-off lane, 34 general use spaces, 19 student spaces, 16 staff spaces, four school van spaces, and four ADA spaces (for a total of 77 parking spaces).

As shown on Figure 4, the Proposed Project would include a new parking lot and drop-off area north of the football field, accessible via a one-way entrance driveway and one-way exit driveway along Pastor Timothy J. Winters Street. The parking lot would include 26 general-use spaces and two ADA spaces, for a total of 28 parking spaces. The parking lot would be accessed from the school campus via an existing concrete walkway along the perimeter of the football field. Existing access points along Skyline Drive and 61st Street would remain. The kindergarten through eighth grade parking lot along Skyline Drive would also be improved with an addition of eight parking spaces east of the auditorium, as well as a new drop-off area that would be curb cut along Skyline Drive and separated from traffic by a raised median. The new drop-off area would be one-way and would be accessed by the existing parking lot entrance and exit driveways; the remaining existing drop-off area on Skyline Drive in front of the school would be eliminated and filled in, resulting in an expanded sidewalk along the southern frontage of the Project Site. Other kindergarten through eighth grade parking lot improvements include repairs to the existing lot, and restriping. No changes to the parking lot access from 61st Street is proposed.

As noted previously, a LMA was not conducted for the Proposed Project because no new vehicle trips would be generated. However, because substantial modifications to site access, parking, and on-site circulation would be constructed as part of the Proposed Project, a review of site access and circulation was conducted to determine whether the Proposed Project modifications would result in any new hazardous conditions or increase the severity of existing hazardous conditions. In particular, the new access and loading area at the northerly limits of the Project Site is anticipated to increase vehicle activity on Pastor Timothy J. Winters Street, and the introduction of a new drop-off area along Skyline Drive would increase pedestrian activity across the kindergarten through eighth grade parking lot.

Proposed Northern Parking Lot

As noted previously, there is currently no sidewalk on the south side of the Pastor Timothy J. Winters Street from Jenna Court to about 500 feet to the west near the school property line. With the increase in vehicle activity on Pastor Timothy J. Winters Street, this lack of sidewalk connectivity could increase the exposure of pedestrians to hazardous conditions (i.e., vehicle-pedestrian conflicts), resulting in a potentially significant impact. However, because there is an ADA compliant sidewalk on the northern side of Pastor Timothy J. Winters Street, it is assumed pedestrians would use that sidewalk. As a result, impacts related to safety hazards

associated with the construction and operation of the northern parking lot would be less-than-significant.

Furthermore, there is currently no traffic control at the intersection of Jenna Court and Pastor Timothy J. Winters Street, which would be aligned with one of the two new proposed one-way driveways (outbound). With the increase in vehicle activity on Pastor Timothy J. Winters Street and the introduction of vehicle turning movements out of the proposed parking/drop-off area to the south of Jenna Court, hazardous conditions for vehicles and pedestrians (i.e., vehicle-vehicle and vehicle-pedestrian conflicts) at this location would be introduced, resulting in a potentially significant impact. Implementation of **Mitigation Measure TRA-1** (see below) would mitigate the impact to a less-than-significant level.

Modified Southern Parking Lot

The proposed modifications to the existing passenger loading zone on Skyline Drive would result in more organized and predictable vehicle movements between the loading zone and through-travel lanes. This would reduce potential vehicle-vehicle conflicts compared to existing conditions where vehicles currently can pull into and out of traffic along the entire school frontage on Skyline Drive. Furthermore, by separating the passenger loading zone from vehicle traffic with a raised median, students being dropped-off and picked-up would be more physically distanced from fast-moving vehicles on Skyline Drive, thereby reducing hazardous conditions for pedestrians (i.e., vehicle-pedestrian conflicts). Based on the above, hazards for vehicles and pedestrians would be reduced with implementation of the Proposed Project, and the impact would be less than significant.

Mitigation Measures

TRA-1: Jenna Court/Pastor Timothy J. Winters Street Intersection Improvements. Prior to commencing construction of the new parking lot and drop-off area north of the football field, the District shall coordinate with the City on the appropriate traffic control at Pastor Timothy J. Winters Street/Jenna Court/new Project driveway. If necessary, a stop sign warrant shall be conducted. If stop signs are warranted, then the District shall install stop signs and provide high-visibility crosswalks, to current City standards.

Significance Determination: Less than significant with mitigation

d) **Less-than-Significant Impact.** A significant impact would occur if the design of the Proposed Project would not satisfy local emergency access requirements. The Proposed Project would not include any alterations of existing roadway features (e.g., road realignment) that would create a permanent change to access for emergency vehicles. During construction of the Project, heavy construction-related vehicles could interfere with emergency response to the site (e.g., slowing vehicles traveling behind the truck). However, such delays would be infrequent and brief (drivers are required to pull over to allow an emergency vehicle on-call to pass), and contract specifications for the Project would ensure that emergency vehicle access on area roadways would be maintained at all times. As such, inadequate emergency access would not occur as a result of Project construction, and impacts would be less than significant.

References

California Department of Transportation (Caltrans), 2014. *California Manual on Uniform Traffic Control Devices*. Updated December 9, 2015.

City of San Diego, 2020. *Draft Transportation Study Manual (TSM).* June 10, 2020.

Linscott, Law & Greenspan, Engineers (LLG), 2020. *Transportation Study – O'Farrell Charter School*. September 26, 2020.

Metropolitan Transit System, 2019. Route 12 Timetable. Effective September 1, 2019.

Tribal Cultural Resources

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
18. Tribal Cultural Resources — Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
a) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☐	☐
b) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Discussion

a, b) **Less-than-Significant Impact with Mitigation.** A Sacred Lands File (SLF) search request was submitted to the California Native American Heritage commission (NAHC) on July 9, 2020. The NAHC responded via letter on July 14, 2020 indicating that no Native American cultural resources are known to be within the Project Site or its vicinity.

Jamul Indian Village requested AB 52 consultation with the District on future projects, and consultation was initiated by the District on October 25, 2018. On November 12, 2018, the Jamul Indian Village provided a list of schools to District staff that were determined to be in sensitive areas, which included O'Farrell Charter School. No other California Native American tribes are on the District's consultation list for AB 52.

Based on consultation, Jamul Indian Village requested a Kumeyaay Native American monitor for all ground disturbing activities. Therefore, to reduce potentially significant impacts on tribal cultural resources, Mitigation Measure TRI-1, which was developed in coordination with the Jamul Indian Village, would be required to minimize potential damage or loss of tribal cultural resources during Project specific ground disturbing activities. Mitigation Measure TRI-1 would reduce potential impacts to less than significant.

Mitigation Measures:

TRI-1: Monitoring of Ground-Disturbing Activities by Native American Monitors. To reduce potential impacts on Tribal Cultural Resources (TCRs), monitoring shall be conducted by a qualified Kumeyaay Native American monitor during all ground-disturbing activities. The role of the Kumeyaay Native American monitor would be to represent tribal concerns and communicate with the tribal council. Appropriate representatives would be identified based on the location of the identified traditional

location or place. Specifically, the following measures shall be implemented to reduce impacts:

- The Native American consultant/monitor, in consultation with the District, shall determine the extent of their presence during soil-disturbing and grading/excavation/trenching activities, and assist the District's qualified archaeologist and District with preparing the monitoring plan.
- If prehistoric resources are encountered during the Native American consultant/monitor's absence, work shall stop until the Native American monitor can observe and comment on the nature of the find.
- Attendance by Native American monitors during construction and restoration of the Proposed Program is at the discretion of the tribe, and the absence of a Native American monitor, should the tribes choose to forgo monitoring for some reason, will not delay work.
- The Native American monitors shall have the ability to notify the District's qualified archaeological monitor who has the authority to temporarily stop work if they find a cultural resource that may require recordation and evaluation.
- Interpretation of a find shall be requested from the Native American consultant/monitors involved with the discovery, evaluation, or data recovery of unanticipated finds for inclusion in a final Cultural Resources Report.
- The Native American monitor, in consultation with the District's qualified archaeologist, shall have the discretion to increase or decrease the level of monitoring under certain field conditions such as modern disturbance, including previous excavation/grading/trenching activities that exceed the depth of, or have removed, potential archaeological deposits; or when native soils are encountered.

Significance Determination: Less than significant with mitigation.

Utilities and Service Systems

Issues (and Supporting Information Sources):	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*
19. 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?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Discussion

a) **Less-than-Significant Impact.** Wastewater treatment service is provided to the Project Site by the Metropolitan Sewerage System (Metro System), which is owned and operated by the City of San Diego Public Utilities Department's (PUD) Wastewater Branch (PUD 2020). Three treatment plants treat wastewater generated in the Metro System, including the Point Loma Water Reclamation Plant (PLWRP), South Bay Water Reclamation Plant (SBWRP), and the North City Wastewater Treatment Plant (NCWTP). The SBWRP currently treats the wastewater generated by the Project Site and has a treatment capacity of 15 million gallons per day (mgd). In 2017, the measured wastewater collected was 7.3 mgd, which leaves an available capacity of approximately 7.7 mgd (PUD 2017).

As previously mentioned, no new staff or student enrollment would result from implementation of the Project, and there would be no new source of wastewater generation within the SBWRP service area. As such, the Proposed Project would not require the construction or expansion of wastewater facilities, and impacts would be less than significant.

Water service is provided to the Project Site by the PUD's Water Branch through agreements with the San Diego County Water Authority, which is a member agency of the Metropolitan Water District (MWD). According to PUD's 2015 Urban Water Management Plan, normal year water supply for 2020 will be 200,984 acre-feet per year,

or approximately 179 mgd (PUD 2016). Construction of the Proposed Project would require the use of water for activities such as dust suppression and the mixing of concrete; however, any water usage during construction would be minimal and temporary. Operation of the Project would not result in an increase of students or staff, which would result in water usage similar to existing conditions at the site. Therefore, the Proposed Project would not represent a new source of water demand within the PUD service area, and sufficient water supplies are available to serve the Proposed Project. Impacts on water supplies would be less than significant.

As previously mentioned above in Issue 10, the Proposed Project would include the addition of drainage improvements throughout the campus and introduction of landscaping elements, which would reduce the rate of surface stormwater runoff. Surface runoff within the Project Site would continue to be conveyed to and serviced by the existing storm drain system, and would not require the construction or expansion of stormwater drainage facilities. Similarly, the Proposed Project would utilize existing connections for electric power, natural gas, and telecommunications facilities. As a result, impacts on the construction or expansion of stormwater drainage facilities, electric power, natural gas, or telecommunications facilities would be less than significant.

b) **Less-than-Significant Impact.** As previously mentioned, implementation of the Proposed Project would increase student capacity, but would not result in an increase in enrollment at the school campus. Therefore, demand for water would not be significantly greater than what currently exists at the Project Site. As such, sufficient water supplies are available to serve the Proposed Project, and impacts on water supplies would be less than significant.

c) **Less-than-Significant Impact.** Improvements at the Project Site would not increase the number of staff or students enrolling at the school. Therefore, the Proposed Project would not generate greater demand for wastewater treatment compared to existing conditions. As such, the wastewater treatment provider that currently serves the Project would have adequate capacity to meet demand, and impacts on wastewater service would be less than significant.

d) **Less-than-Significant Impact.** The waste generated during construction of the Proposed Project would mainly consist of general construction debris (including from demolition of the basketball and tennis courts) and worker personal waste. The construction contractor would be required to dispose of solid waste in accordance with local solid waste disposal requirements. Similar to existing conditions, construction solid waste would be taken to the closest landfill to the Project Site, which is the Sycamore Landfill, approximately 9.3 miles north of the Project Site. The Sycamore Landfill has a permitted throughput of 5,000 tons per day, and has a remaining capacity of 113,972,637 cubic yards (CalRecycle 2020). The landfill's cease operation date is anticipated to be in the year 2042. Therefore, the landfill would have sufficient capacity to accommodate the Proposed Project's construction disposal needs. After completion of construction, solid waste generation would not be significantly greater than what currently exists at the site,

as the Proposed Project would not result in an increase in staff or students enrolled. The Project Site would continue to be served by Sycamore Landfill with sufficient permitted capacity to accommodate the school's solid waste disposal needs. As a result, impacts would be less than significant.

e) **Less-than-Significant Impact.** As previously mentioned, the Proposed Project would be served by a permitted landfill capable of accommodating the school's solid waste. During construction, non-recyclable solid waste would be taken to a permitted landfill. During operation, the Proposed Project would continue to generate municipal solid waste that would be accepted by waste haulers and landfill operators. In addition, the City would be required to maintain a 50 percent diversion rate required by the state for all solid waste generated. The school would continue to comply with federal, state, and local regulations related to solid waste. Therefore, impacts would be less than significant.

References

California Department of Resources Recycling and Recovery (CalRecyle). 2020. Facility Site Summary Details: Sycamore Landfill. Available at https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/1798?siteID=2871. Accessed July 2020.

City of San Diego Public Utilities Department (PUD). 2016. City of San Diego 2015 Urban Water Master Plan. June, 2016. Accessed July, 2020.

____. 2017. 2017 South Bay Wastewater Reclamation Plant & Ocean Outfall Annual Report and Summary. Accessed July, 2020.

____. 2020. Wastewater Treatment Plant Monitoring. Webpage. https://www.sandiego.gov/public-utilities/sustainability/wastewater-plant-monitoring. Accessed July, 2020.

Wildfire

Issues (and Supporting Information Sources):	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
20. WILDFIRE — If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Discussion

a) **Less-than-Significant Impact**. The Project Site is within a developed urban area that has not been identified as a wildland fire hazard area. According to the CAL FIRE VHFHSZ in Local Responsibility Area Map, the Project Site is not located within a fire hazard severity zone (CAL FIRE 2009). Further, all Project activities would occur within the already developed school property. As previously discussed above in Issue 9 (f), current access to the Project Site for emergency vehicles is provided from the parking lots along Skyline Drive, at the entrance of the staff parking lot along 61st Street, and a fire lane also along 61st Street near the athletic fields. Construction activities would occur within the Project Site, with the exception of the student drop-off along Skyline Drive, which would be curb cut into the public right-of-way. Although access to the Project Site may be temporarily altered during construction of the Project, such delays would be infrequent and brief (drivers are required to pull over to allow an emergency vehicle on-call to pass), and contract specifications for the Project would ensure that emergency vehicle access on area roadways would be maintained at all times. After construction of the Project, emergency access would improve from existing conditions, as a new parking lot would be constructed along the northern portion of the site along Pastor Timothy J. Winters Street. As a result, the Project would not result in the impairment of an adopted emergency response plan or emergency evacuation plan to less than significant levels.

b) **Less-than-Significant Impact**. As detailed above in Issue 20 (a), the Project Site is within a developed urban area that has not been identified as a wildland fire hazard area. According to the CAL FIRE VHFHSZ in Local Responsibility Area Map, the Project Site is not located within a fire hazard severity zone (CAL FIRE 2009).

While the Project Site itself is relatively level (with the exception of the high school campus being elevated and a berm in the northern portion of campus), the surrounding topography generally slopes downward to the southwest. Pastor Timothy J. Winters Street is topographically higher along the northwestern portion of the Project Site, then slopes down to below the berm located north of the playfields. Skyline Drive, along the southern boundary of the Project Site, is topographically lower than the Project Site along the eastern portion of campus. Vegetated slopes buffer the Project Site to the north, south, and east.

While portions of the Project Site and surrounding area vary in slope and while construction would include materials that are considered flammable, such as fuels and household cleaners, the handling and storage of such materials would be conducted in accordance to applicable regulations. The Proposed Project would be designed and constructed in accordance with the California Fire Code. In addition, the berm located north of the playfields would be graded, reducing the amount of slopes on the Project Site. After completion of construction, the modernization activities would not change the ongoing operations at the school. The Proposed Project would occur on an existing developed school site, and would not exacerbate wildfire risks, and would not expose people to pollutant concentrations for a wildfire or the spread of a wildfire. Therefore, impacts would be less than significant.

c) **Less-than-Significant Impact**. Construction of the Proposed Project would utilize existing infrastructure, including roads, water sources, and power lines surrounding the Project Site. Infrastructure is already established in the area, and would not exacerbate fire risk at the Project Site. Thus, impacts would be less than significant.

d) **Less-than-Significant Impact**. As detailed above in Issue 7, according to the Encanto Neighborhoods Community Plan, the Project Site is mapped as a "slide-prone formation", due to the hilly topography of the community (City of San Diego 2016). Although the Project Site and surrounding community are considered slide prone, the general topography of the Project Site has been modified through previous development activities, and is relatively flat (with the exception of the high school campus being elevated and a berm in the northern portion of campus). Additionally, all improvements would occur within the Project Site, and be subject to all requirements of the 2018 California Building Code and the 2010 California Fire Code.

Further, the Project Site is not located within a flood hazard zone. As detailed above in Issue 10, construction of the Proposed Project would not result in significant impacts on the existing drainage pattern due to implementation of BMPs that would minimize flooding and runoff. After the completion of construction, drainage patterns would be restored to existing conditions. Drainage for the site would continue to be serviced by the existing storm drain system. Therefore, the Proposed Project would not expose people or structures to significant risk including downstream flooding or landslides as a result of runoff, post-fire slope stability, or drainage changes, and impacts would be less than significant.

References

California Department of Forestry and Fire Protection (CAL FIRE). 2009. San Diego Very High Fire Hazard Severity Zones in LRA.

City of San Diego. 2016. Encanto Neighborhoods Community Plan. Available at https://www.sandiego.gov/sites/default/files/encanto_community_plan-revised_lu_maps-reduced_6-20-16.pdf

Mandatory Findings of Significance

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

Discussion

a) **Less-Than-Significant Impact with Mitigation Incorporated.** As discussed in Issue 4, the Project Site is developed as an operating school with a majority of the campus paved or graded with playfields. Implementation of the Proposed Project may include the removal and replacement of ornamental trees, as detailed in the Project Description, which could provide suitable nesting habitat for migratory birds and urban-adapted raptors. With implementation of Mitigation Measure BIO-1, potential impacts to nesting birds and raptors would be less than significant. No federally protected wetlands are present at the Project Site, and the Proposed Project would not interfere with the movement of wildlife and/or wildlife corridors. With implementation of Mitigation Measure BIO-1, the Project would not result in impacts on biological resources that would have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animals. In addition, as discussed in Issue 5, in the unlikely event that archaeological resources are encountered they may qualify as historical resources pursuant to CEQA. With the incorporation of Mitigation Measures CUL-1 through CUL-3, potential impacts to archaeological resources would be reduced to a less than significant level. Further, implementation of Mitigation Measure TRI-1 would be required to minimize potential damage or loss of tribal cultural resources during Project specific ground disturbing activities, and would reduce potential impacts to less than significant. Therefore, impacts would be less than significant with mitigation incorporated.

b) **Less-Than-Significant Impact with Mitigation Incorporated.** A cumulative impact would occur if the Proposed Project would result in an incrementally considerable contribution to a significant cumulative impact in consideration of past, present, and reasonably foreseeable future projects for each resource area. As indicated above, there are a number of environmental issues areas for which the Project would have no impact. These issues include agricultural and forestry resources, land use, mineral resources, and population and housing. For these issue areas, as the Proposed Project would have no impact, the Proposed Project would also not contribute to a cumulatively significant impact. The Proposed Project would result in a less than significant impact in certain environmental issue areas but because of the location and nature of the Proposed Project, the Proposed Project would not contribute to a cumulatively significant impact. However, the Proposed Project could contribute to cumulatively significant impacts when considered together with other past, present, or reasonably foreseeable future projects in the vicinity of the O'Farrell Charter School for those areas in which a potentially significant impact has been identified. However, with implementation of Mitigation Measures AIR-1 and AIR-2, BIO-1, CUL-1 through CUL-3, HAZ-1 and HAZ-2, NOI-1 and NOI-2, TRA-1, and TRI-1 the Proposed Project would be reduced to less than significant impacts. With implementation of mitigation measures, the Project would not result in an incrementally considerable contribution to a significant cumulative impact. Therefore, with implementation of mitigation measures, a less than significant cumulative impact would occur.

c) **Less-Than-Significant Impact with Mitigation Incorporated**. As discussed above, all identified potential impacts associated with the Proposed Project would be reduced to less than significant with implementation of mitigation measures. No direct or indirect significant and unavoidable impacts would occur with implementation of the Proposed Project. As a result, the Proposed Project would not cause a substantial adverse effect on human beings, either directly, or indirectly, with implementation of mitigation measures.