

Final Mitigated Negative Declaration (MND)

for

Grant K-8 School Whole Site Modernization

SCH#: 2015071066



Prepared for:



San Diego Unified School District

Prepared by:



BRG Consulting, Inc.

October 2015

Final Mitigated Negative Declaration

SUBJECT: Grant K-8 School – Whole Site Modernization (WSM) Project

I. ENVIRONMENTAL SETTING: See attached Initial Study.

II. PROJECT DESCRIPTION: See attached Initial Study.

III. DETERMINATION:

The San Diego Unified School District (District) has conducted an Initial Study for the proposed Grant K-8 School WSM Project and determined that the proposed project could have a significant environmental effect in the following areas: **Cultural Resources, Hazards and Hazardous Materials, and Noise.** Future development of the any of the components of the proposed project shall be required to implement the mitigation measure identified in *Section V. Mitigation Monitoring and Reporting Program* (MMRP) of this Mitigated Negative Declaration. Implementation of the prescribed mitigation would avoid or mitigate the potentially significant environmental effects identified by this analysis, and the preparation of an Environmental Impact Report is not required for the implementation of the proposed project.

IV. DOCUMENTATION:

The attached Initial Study documents the evidence to support the above determination.

V. MITIGATION MONITORING AND REPORTING PROGRAM:

The following mitigation measure is required to reduce potentially significant impacts to Cultural Resources (Paleontological Resources) to below a level of significance:

Mitigation Measure CR-1: Prior to site grading, a qualified paleontologist (a qualified paleontologist is defined as an individual with a minimum MS or Ph.D. in paleontology or geology who is familiar with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology procedures and techniques, and who has worked as a paleontological mitigation project supervisor in the County for at least 1 year) shall be retained by the District to prepare a Paleontological Assessment Report that includes record searches and reviews of the existing literature for the project area in order to determine the likelihood of fossils being impacted. If the report identifies impacts on highly sensitive paleontological deposits that cannot be avoided, the following additional measures shall be implemented to recover remains before they are lost or destroyed:

- The qualified paleontologist shall be present at the pre-construction meeting to consult with the grading and excavation contractors.
- If highly sensitive fossil-bearing deposits are likely to be impacted and the proposed construction methodology would allow for the recovery of fossils, then the following measures would be incorporated into the project MMRP.
 - If mitigation is necessary, then a Qualified Paleontologist shall attend pre-construction meetings to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues.
 - A paleontological monitor shall be on-site on a full-time basis during the original cutting of previously undisturbed deposits of high sensitivity formations to inspect exposures for contained fossils. The paleontological monitor shall work under the direction of a qualified paleontologist. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials.
 - If discovered, the Qualified Paleontologist (or Paleontological Monitor) shall recover fossils. In most cases, this fossil salvage can be completed in a short period of time. However, some fossil specimens, such as

complete large mammal skeleton, may require an extended salvage period. In these instances the Qualified Paleontologist (or Paleontological Monitor) shall be allowed to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner. Because of the potential for the recovery of small fossil remains, such as isolated mammal teeth, it may be necessary in certain instances, to set up a screen-washing operation on the site.

- Fossil remains collected during the monitoring and salvage portion of the mitigation program shall be cleaned, repaired, sorted, and cataloged.
- Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall either be deposited (as a donation) in a scientific institution with permanent paleontological collections such as the San Diego Natural History Museum. Donation of the fossils shall be accomplished by financial support for initial specimen storage.
- A final summary report shall be completed and retained on file at the District that outlines the results of the mitigation program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.

The following mitigation measure is required to reduce potentially significant impacts associated with Hazards and Hazardous Materials to below a level of significance:

Mitigation Measure HZ-1: In the event burned waste is encountered during construction of the proposed project, that material shall be handled in accordance with state and local laws and regulations and under the oversight of the California Department of Toxic Substances Control (DTSC).

The following mitigation measures are required to reduce potentially significant impacts associated with Noise to below a level of significance:

Mitigation Measure N-1: The construction contractor shall develop and implement a noise control plan that includes a noise control monitoring program to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers. The plan may include the following requirements:

- Contractor shall turn off idling equipment.
- Contractor shall perform noisier operation during the times least sensitive to receptors. Internal combustion engines should be equipped with a muffler of a type recommended by the manufacturer and in good repair. All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers.
- Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or security staff facilities.
- For all noise-generating construction activities, additional noise attenuation techniques shall be employed as necessary to reduce noise levels. Such techniques shall include, but are not limited to, the use of sound blankets on individual pieces of construction equipment, sound absorptive panels, noise shrouds, and temporary sound barriers that meet a sound transmission class (STC) rating of 25 between construction sites and nearby sensitive receptors as specified in the noise control plan. Stationary noise-generating equipment, such as generators and compressors, should be located as far as practically possible from the nearest residential property lines.

Mitigation Measure N-2: The construction contractor shall limit the number of large pieces of equipment (i.e., bulldozers or concrete mixers) operating adjacent to sensitive receptors (i.e., residential homes) to one at any given time.

Mitigation Measure N-3: The District shall provide notification to residential occupants adjacent to the project site at least 24 hours prior to initiation of construction activities that could result in substantial noise levels at outdoor or indoor living

areas. This notification should include the anticipated hours and duration of construction and a description of noise reduction measures being implemented at the project site. The notification should include a telephone number for local residents to call to submit complaints associated with construction noise.

VI. DESIGN CONSIDERATIONS

During construction of the proposed project, the Contractor shall control its operations to prevent disruption of school operations and damage to existing infrastructure, structures, and utilities related to potential noise vibration. Measured ground vibration at any adjacent structure shall not exceed a peak particle velocity of 0.5 inches per second. Preventive measures related to structural effects shall include but are not limited to selecting construction methods, procedures and equipment that will prevent damage to adjacent structures, and monitoring and controlling the vibrations from construction activities. The use of high-impact equipment such as pile drivers, hoe rams, and pavement breakers within 50 feet of structures should be avoided to the maximum extent feasible. The Contractor shall protect structures near the area of work from damage and repair all damages caused by operations at no additional cost to and to the satisfaction of the District. Preventative measures related to effects on school operations shall include those related to structure effects, coordination with the school regarding any use of high-impact equipment, and scheduling the use of such equipment outside of normal classroom hours.

Equipment	Distance from Construction (feet)				
	25	50	75	100	175
	Peak Particle Velocity (in/sec)				
Pile Driver (impact)	1.518	0.5367	0.2921	0.1898	0.0820
Pile Driver (sonic)	0.734	0.2595	0.1413	0.0918	0.0396
Vibratory Roller	0.21	0.0742	0.0404	0.0263	0.0113
Hoe Ram	0.089	0.0315	0.0171	0.0111	0.0048
Large Bulldozer	0.089	0.0315	0.0171	0.0111	0.0048
Caisson Drill Rig	0.089	0.0315	0.0171	0.0111	0.0048
Loaded Truck	0.076	0.0269	0.0146	0.0095	0.0041
Jackhammer	0.035	0.0124	0.0067	0.0044	0.0019
Small Bulldozer	0.003	0.0011	0.0006	0.0004	0.0002

VII. PUBLIC REVIEW DISTRIBUTION:

The following individuals, organizations, and agencies received a copy or notice of the draft Mitigated Negative Declaration:

Federal, State, and Local Agencies

- State Clearinghouse (for distribution as noted in NOC)
- California Department of Fish & Wildlife, San Diego Office
- San Diego Regional Water Quality Control Board
- Mr. Marlon Pangilinan, City of San Diego - Community Planner for Uptown Community

Other Entities/Organizations

- Mr. Leo Wilson, Chair – Uptown Planners
- Mission Hills Branch Library

VIII. CALIFORNIA ENVIRONMENTAL QUALITY ACT MITIGATED NEGATIVE DECLARATION FINDINGS:

This Mitigated Negative Declaration reflects the decision-making body’s independent judgment and analysis, and; that the decision-making body has reviewed and considered the information contained in this Mitigated Negative Declaration and the comments received during the public review period, and; on the basis of the whole record before the decision-making

body (including this Mitigated Negative Declaration) that there is no substantial evidence that the project will have a substantial effect of the environment.

IV. RESULTS OF PUBLIC REVIEW:

- () No comments were received during the public input period.
- () Comments were received but did not address the Draft Mitigated Negative Declaration finding or the accuracy/completeness of the Initial Study. No response is necessary. The letters are attached.
- (X) Comments addressing the findings of the Draft Mitigated Negative Declaration and/or accuracy or completeness of the Initial Study were received during the public input period. The letters and responses follow.

X. LIST OF PUBLIC AGENCIES THAT COMMENTED ON THE DRAFT MND

A draft version of this MND was circulated for public review from July 24, 2015 to August 24, 2015. The following is a listing of the public agencies that commented during this public review period. The letters and response to comments are attached to this document following the MND. No revisions were made to the Initial Study/Environmental Checklist as a result of the letters received on the Draft MND. Specifically, no new significant impacts would result from the proposed project or no new mitigation measures are proposed for implementation different from those discussed in the Draft MND.

INDEX OF COMMENT LETTERS

Comment Letter	Commenter	Letter Date
A1	State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	8/25/2015
A2	State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	9/1/2015
B	Department of Toxic Substances Control	8/31/2015

Copies of the Final Mitigated Negative Declaration and any Initial Study material are available for review at:

- City of San Diego Library, Mission Hills Branch, 925 W. Washington Street, San Diego, CA 92103
- Grant K-8 School, 1425 Washington Place, San Diego, CA 92103 (Main Office)
- San Diego Unified School District, 4860 Ruffner Street, San Diego, CA 92111 (Physical Plant Operations Annex, Room 5)
- Online at the Environmental Reviews/Studies page at www.sandi.net/facilities

 Gary Stanford
 Director of Project Management

 July 24, 2015
 Date of Draft Report

 October 13, 2015
 Date of Final Report

Comment Letter A1



Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

August 25, 2015

Kathryn Ferrell
San Diego Unified Port District
4860 Ruffner Street
San Diego, CA 92111

Subject: Grant K-8 Whole Site Modernization Project
SCH#: 2015071066

Dear Kathryn Ferrell:

The State Clearinghouse submitted the above named Mitigated Negative Declaration to selected state agencies for review. The review period closed on August 24, 2015, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

A1-1

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

RESPONSE TO COMMENT FROM STATE OF CALIFORNIA, GOVERNOR'S OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE AND PLANNING UNIT SIGNED BY SCOTT MORGAN, DIRECTOR, DATED AUGUST 25, 2015 (COMMENT LETTER A1)

Response to Comment A1-1:

This letter acknowledges that the San Diego Unified School District (District) has complied with the State Clearinghouse public review requirements for the Grant K-8 Whole Site Modernization Project Mitigated Negative Declaration (MND), pursuant to the California Environmental Quality Act (CEQA).

**Comment Letter A1
(cont'd)**

**Document Details Report
State Clearinghouse Data Base**

SCH# 2013051030
Project Title Correia Middle School Sports Complex Project
Lead Agency San Diego Unified School District

Type EIR Draft EIR
Description The proposed project is the construction and operation of a new Sports Complex on the Correia Middle School campus. The complex will include: 1) a natural turf softball field that can also accommodate field sports in the outfield area; 2) an artificial turf play field with multiple markings for either one football field or a combination of two other field sports; and, 3) a hard court play area. Additional project features will include: a long jump pit; a classroom/team room building; a restroom / concession / storage building; sports field lighting of the natural and artificial turf play areas; a new paved pedestrian walkway connecting the different sports venues; a new electrical service; new field irrigation and cooling infrastructure; and, landscaping.

Lead Agency Contact
Name Kathryn Ferrell
Agency San Diego Unified School District
Phone 858 627 7298 **Fax**
email kferrell@sandi.net
Address 4860 Ruffner Street
City San Diego **State** CA **Zip** 92111

Project Location
County San Diego
City
Region
Lat / Long 32° 44' 46" N / 117° 13' 51" W
Cross Streets 4302 Valeta Street
Parcel No. 449-110-03
Township 16S **Range** 3W **Section** **Base** SBB&M

Proximity to:
Highways I-8, 5
Airports San Diego International
Railways San Diego MTS
Waterways Famosa Slough; Pacific Ocean; Mission Bay
Schools Multiple
Land Use Institutional - Middle School / RM-1-1 / Institutional and Public Facilities

Project Issues Air Quality; Geologic/Seismic; Soil Erosion/Compaction/Grading; Other Issues; Toxic/Hazardous; Water Quality; Noise; Traffic/Circulation; Aesthetic/Visual; Agricultural Land; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Minerals; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Solid Waste; Vegetation; Water Supply; Wetland/Riparian; Growth Inducing; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Conservation; Department of Fish and Wildlife, Region 5; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 11; Air Resources Board; Regional Water Quality Control Board, Region 9; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 12/05/2014 **Start of Review** 12/05/2014 **End of Review** 01/20/2015

Note: Blanks in data fields result from insufficient information provided by lead agency.

RESPONSE TO COMMENT FROM STATE OF CALIFORNIA, GOVERNOR'S OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE AND PLANNING UNIT SIGNED BY SCOTT MORGAN, DIRECTOR, DATED AUGUST 25, 2015 (COMMENT LETTER A1) (continued)

Comment Letter A2

RESPONSE TO COMMENT FROM STATE OF CALIFORNIA, GOVERNOR'S OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE AND PLANNING UNIT SIGNED BY SCOTT MORGAN, DIRECTOR, DATED September 1, 2015 (COMMENT LETTER A2) (continued)



STATE OF CALIFORNIA
GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
STATE CLEARINGHOUSE AND PLANNING UNIT



KEN ALEX
DIRECTOR

EDMUND G. BROWN JR.
GOVERNOR

September 1, 2015

Kathryn Ferrell
San Diego Unified Port District
4860 Ruffner Street
San Diego, CA 92111

Subject: Grant K-8 Whole Site Modernization Project
SCH#: 2015071066

Dear Kathryn Ferrell:

The enclosed comment (s) on your Mitigated Negative Declaration was (were) received by the State Clearinghouse after the end of the state review period, which closed on August 24, 2015. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2015071066) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resource Agency

A2-1

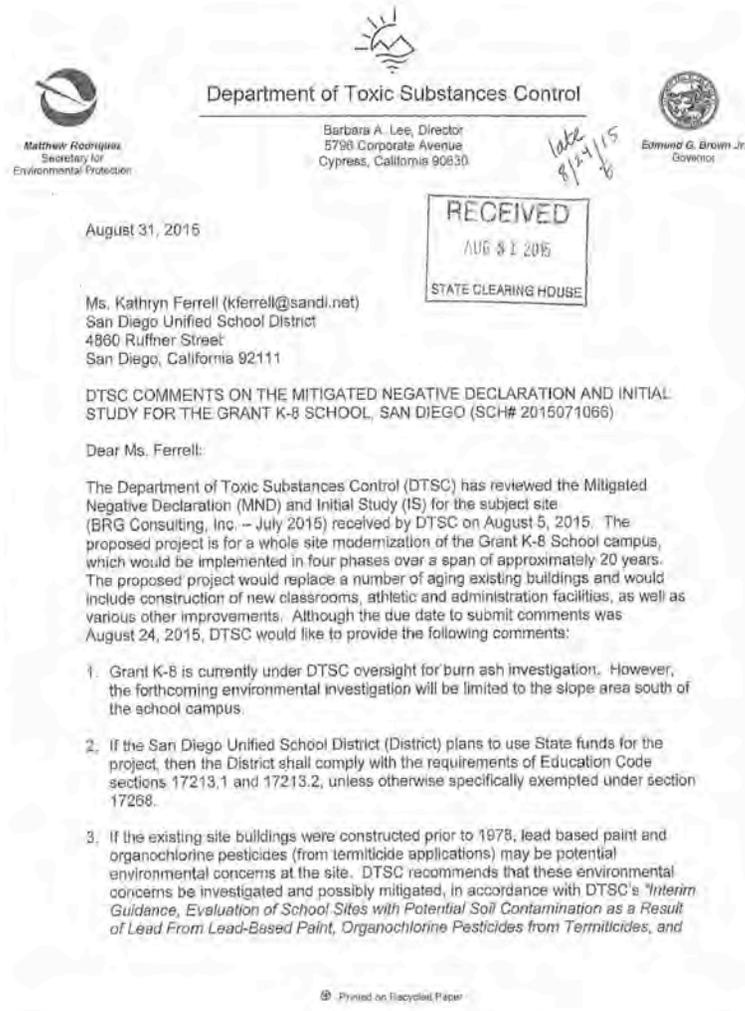
Response to Comment A2-1:

This is a second letter from the State Clearinghouse transmitting a comment letter received by the Department of Toxic Substances Control (DTSC) after the public comment period. DTSC also sent this letter directly to the District. This letter and responses are provided below as Comment Letter B.

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Comment Letter A2
(cont'd)

RESPONSE TO COMMENT FROM STATE OF CALIFORNIA, GOVERNOR'S
OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE AND
PLANNING UNIT SIGNED BY SCOTT MORGAN, DIRECTOR, DATED
SEPTEMBER 1, 2015 (COMMENT LETTER A2) (continued)



**Comment Letter A2
(cont'd)**

**RESPONSE TO COMMENT FROM STATE OF CALIFORNIA, GOVERNOR'S
OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE AND
PLANNING UNIT SIGNED BY SCOTT MORGAN, DIRECTOR, DATED
SEPTEMBER 1, 2015 (COMMENT LETTER A2) (continued)**

Ms. Kathryn Ferrell
August 31, 2015
Page 2

Polychlorinated Biphenyls from Electrical Transformers," dated June 9, 2006.

4. If the site was previously used for agricultural purposes, pesticides (DDT, DDE, toxaphene) and fertilizers (usually containing heavy metals) commonly used as part of agricultural operations are likely to be present. These agricultural chemicals are persistent and bio-accumulative toxic substances. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with the *"Interim Guidance for Sampling Agricultural Soils (Third Revision),"* dated August 2008. This guidance should be followed to sample agricultural properties where development is anticipated.
5. If a response action is required based on the results of the above investigations, and/or other information, the Draft Environmental Impact Report (EIR) will require an analysis of the potential public health and environmental impacts associated with any proposed response action, pursuant to requirements of the CEQA (Pub. Resources Code, Div. 13, §21000 et seq.) and its implementing Guidelines (CCR, Title 14, §15000 et seq.), prior to approval. A discussion of the mitigation and/or removal actions, if necessary, and associated cumulative impacts to each site and the surrounding environment, should be included in the Draft EIR. If sufficient information to discuss the proposed mitigation and/or removal actions, and their associated impacts to each site and the surrounding environment, are not available for inclusion in the Draft EIR, then an Addendum or Supplement to the Draft EIR may be required.

DTSC is also administering the Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) Program which provides low-interest loans to investigate and cleanup hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. These loans are available to developers, businesses, schools, and local governments.

For additional information on DTSCs School process or CLEAN Program, please visit DTSCs web site at www.dtsc.ca.gov. If you would like to discuss this matter further, please contact me at (714) 484-5320 or at rana.georges@dtsc.ca.gov.

Sincerely,



Rana Georges
Project Manager
Schools Evaluation and Brownfields Cleanup Branch
Brownfields and Environmental Restoration Program

cc: See next page

**Comment Letter A2
(cont'd)**

**RESPONSE TO COMMENT FROM STATE OF CALIFORNIA, GOVERNOR'S
OFFICE OF PLANNING AND RESEARCH, STATE CLEARINGHOUSE AND
PLANNING UNIT SIGNED BY SCOTT MORGAN, DIRECTOR, DATED
SEPTEMBER 1, 2015 (COMMENT LETTER A2) (continued)**

Ms. Kathryn Ferrell
August 31, 2015
Page 3

State Clearinghouse (via e-mail)
Office of Planning and Research
state.clearinghouse@opr.ca.gov

Mr. Michael O'Neill (via e-mail)
Department of Education – Sacramento, CA
moneill@cde.ca.gov

John Gordon (via e-mail)
Department of Education – Sacramento, CA
JGordon@cde.ca.gov

B&ERP Reading File – Cypress

CEQA Reading File – Cypress

Comment Letter B



Department of Toxic Substances Control

Barbara A. Lee, Director
5796 Corporate Avenue
Cypress, California 90630



Edmund G. Brown Jr.
Governor



August 31, 2015

Ms. Kathryn Ferrell (kferrell@sandi.net)
San Diego Unified School District
4860 Ruffner Street
San Diego, California 92111

DTSC COMMENTS ON THE MITIGATED NEGATIVE DECLARATION AND INITIAL STUDY FOR THE GRANT K-8 SCHOOL, SAN DIEGO (SCH# 2015071066)

Dear Ms. Ferrell:

The Department of Toxic Substances Control (DTSC) has reviewed the Mitigated Negative Declaration (MND) and Initial Study (IS) for the subject site (BRG Consulting, Inc. – July 2015) received by DTSC on August 5, 2015. The proposed project is for a whole site modernization of the Grant K-8 School campus, which would be implemented in four phases over a span of approximately 20 years. The proposed project would replace a number of aging existing buildings and would include construction of new classrooms, athletic and administration facilities, as well as various other improvements. Although the due date to submit comments was August 24, 2015, DTSC would like to provide the following comments:

1. Grant K-8 is currently under DTSC oversight for burn ash investigation. However, the forthcoming environmental investigation will be limited to the slope area south of the school campus.
2. If the San Diego Unified School District (District) plans to use State funds for the project, then the District shall comply with the requirements of Education Code sections 17213.1 and 17213.2, unless otherwise specifically exempted under section 17268.
3. If the existing site buildings were constructed prior to 1978, lead based paint and organochlorine pesticides (from termiticide applications) may be potential environmental concerns at the site. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with DTSC's "Interim Guidance, Evaluation of School Sites with Potential Soil Contamination as a Result of Lead From Lead-Based Paint, Organochlorine Pesticides from Termiticides, and

B-1
B-2
B-3
B-4

RESPONSE TO COMMENT FROM DEPARTMENT OF TOXIC SUBSTANCES CONTROL, SIGNED BY RANA GEORGES, PROJECT MANAGER, SCHOOLS EVALUATION AND BROWNFIELDS CLEANUP BRANCH, DATED AUGUST 31, 2015 (COMMENT LETTER B)

Response to Comment B-1:

This is an introduction to the comment letter. No response is necessary. Responses for the specific comments in the letter are addressed in the following response to comments.

Response to Comment B-2:

Comment noted.

Response to Comment B-3:

The District does not anticipate the use of State funds for implementation of the proposed project; however, if State funds would be used, they will comply with the requirements of Sections 17213.1 and 17213.2 of the California Education Code, unless otherwise exempted specifically under Section 17268.

Response to Comment B-4:

According to the Cultural and Historical Resources Existing Conditions Report (Appendix C1 of the MND/IS), two existing buildings on the campus were constructed prior to 1978, including the Kindergarten Building built in 1956 and the Administration Building built in 1974. Each of these buildings is proposed to be demolished during Phase 2A and Phase 3A, respectively, of the proposed project. Due to the age of these buildings, there is the potential that lead-based paint and organochlorine pesticides (from termite applications) could present environmental concerns at the site. However, in compliance with state and federal regulations, a qualified environmental professional will evaluate the potential presence of lead-based paint or organochlorine pesticides prior to demolition of each building. This evaluation will be consistent with DTSC's "Interim Guidance, Evaluation of School sites with Potential Soil Contamination as a Result of Lead from Lead-Based Paint, Organochlorine Pesticides from Termiticides, and Polychlorinated Biphenyls from Electrical Transformers," dated June 9, 2006. Based on the results of the evaluations for each building, appropriate mitigation measures, if required, will be incorporated into the demolition and/or construction contract documents. If the survey for lead-based paint is performed on the exterior of the structure indicates lead-based paint is not present, then an assessment of the soil for lead is not necessary.

♻️ Printed on Recycled Paper

Ms. Kathryn Ferrell
August 31, 2015
Page 2

**Comment Letter B
(cont'd)**

Polychlorinated Biphenyls from Electrical Transformers," dated June 9, 2006.

4. If the site was previously used for agricultural purposes, pesticides (DDT, DDE, toxaphene) and fertilizers (usually containing heavy metals) commonly used as part of agricultural operations are likely to be present. These agricultural chemicals are persistent and bio-accumulative toxic substances. DTSC recommends that these environmental concerns be investigated and possibly mitigated, in accordance with the "Interim Guidance for Sampling Agricultural Soils (Third Revision)," dated August 2008. This guidance should be followed to sample agricultural properties where development is anticipated.

5. If a response action is required based on the results of the above investigations, and/or other information, the Draft Environmental Impact Report (EIR) will require an analysis of the potential public health and environmental impacts associated with any proposed response action, pursuant to requirements of the CEQA (Pub. Resources Code, Div. 13, §21000 et seq.) and its implementing Guidelines (CCR, Title 14, §15000 et seq.), prior to approval. A discussion of the mitigation and/or removal actions, if necessary, and associated cumulative impacts to each site and the surrounding environment, should be included in the Draft EIR. If sufficient information to discuss the proposed mitigation and/or removal actions, and their associated impacts to each site and the surrounding environment, are not available for inclusion in the Draft EIR, then an Addendum or Supplement to the Draft EIR may be required.

DTSC is also administering the Cleanup Loans and Environmental Assistance to Neighborhoods (CLEAN) Program which provides low-interest loans to investigate and cleanup hazardous materials at properties where redevelopment is likely to have a beneficial impact to a community. These loans are available to developers, businesses, schools, and local governments.

For additional information on DTSCs School process or CLEAN Program, please visit DTSCs web site at www.dtsc.ca.gov. If you would like to discuss this matter further, please contact me at (714) 484-5320 or at rana.georges@dtsc.ca.gov.

Sincerely,



Rana Georges
Project Manager
Schools Evaluation and Brownfields Cleanup Branch
Brownfields and Environmental Restoration Program

cc: See next page

RESPONSE TO COMMENT FROM RESPONSE TO COMMENT FROM DEPARTMENT OF TOXIC SUBSTANCES CONTROL, SIGNED BY RANA GEORGES, PROJECT MANAGER, SCHOOLS EVALUATION AND BROWNFIELDS CLEANUP BRANCH, DATED AUGUST 31, 2015 (COMMENT LETTER B) (continued)

B-4
Cont'd

Response to Comment B-4 (continued):

As a result of mandatory compliance with existing regulations and procedures, no significant impacts associated with lead-based paint or organochlorine pesticides would occur. No revisions were made to the MND/IS as a result of this comment.

B-5

Response to Comment B-5:

Comment noted. As discussed in Section II. Agricultural and Forestry Resources of the MND/IS, the project site is not identified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance as designated on maps prepared pursuant to the Farmland Mapping and Monitoring Program. Additionally, the project site is not zoned for agricultural uses, nor are there any existing or previous agricultural uses either on-site or in the immediate vicinity. As such, the presence of pesticides (DDT, DDE, toxaphene) and fertilizers (usually containing heavy metals) commonly used in agricultural operations is unlikely since the project site was not previously used for agricultural purposes.

B-6

Response to Comment B-6:

Comment noted.

B-7

Response to Comment B-7:

Comment noted.

Ms. Kathryn Ferrell
August 31, 2015
Page 3

**Comment Letter B
(cont'd)**

**RESPONSE TO COMMENT FROM RESPONSE TO COMMENT FROM
DEPARTMENT OF TOXIC SUBSTANCES CONTROL, SIGNED BY RANA
GEORGES, PROJECT MANAGER, SCHOOLS EVALUATION AND
BROWNFIELDS CLEANUP BRANCH, DATED AUGUST 31, 2015 (COMMENT
LETTER B) (continued)**

State Clearinghouse (via e-mail)
Office of Planning and Research
state.clearinghouse@opr.ca.gov

Mr. Michael O'Neill (via e-mail)
Department of Education – Sacramento, CA
moneill@cde.ca.gov

John Gordon (via e-mail)
Department of Education – Sacramento, CA
JGordon@cde.ca.gov

B&ERP Reading File – Cypress

CEQA Reading File – Cypress

San Diego, CA 92106

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INITIAL STUDY/ENVIRONMENTAL CHECKLIST FORM

1. Project Title: **Grant K-8 School – Whole Site Modernization (WSM) Project**

2. Lead Agency Name and Address: San Diego Unified School District
Facilities Planning and Construction
Physical Plant Operations Annex
4860 Ruffner Street
San Diego, CA 92111-1522

3. Contact Person and Phone Number: Gary Stanford
Director of Project Management
(858) 637-6280

4. Project Location: Grant K-8 School
1425 Washington Place
San Diego, CA 92103
Uptown Community Plan Area (Figures 1 and 2).

5. Project Sponsor's Name and Address: San Diego Unified School District
Facilities Planning and Construction
Physical Plant Operations Annex
4860 Ruffner Street
San Diego, CA 92111-1522

6. General Plan Designation: Existing School Site – School

7. Zoning: Existing School Site is zoned Residential (RS-1-7).

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

The San Diego Unified School District (District) proposes a multi-phase WSM of the Grant K-8 School campus in the City of San Diego, hereinafter referred to as the "proposed project."

Proposed Whole Site Modernization

The proposed project would be implemented in four phases over a span of approximately 20 years. The following describes each phase of the project:

- Phase 1A of the proposed project will include construction of a two-story elementary school building with eight classrooms, restrooms, a staff lounge, materials storage, a kitchen, a cafe/multi-purpose room, an outdoor covered lunch shelter, and an elevator. In addition, a turf field will be installed upon completion of the construction of Phase 1A. The eight (8) new permanent classrooms will replace eight (8) portable classrooms.
- Phase 1B will include construction of elementary play courts and gecko gardens.

- Phase 2A will include construction of a middle school and kindergarten classroom facilities, restrooms, and an elevator. Phase 2A will include the demolition of two (2) permanent classrooms and eight (8) relocatable classrooms and replace them with 14 new permanent classrooms.
- Phase 2B will include construction of middle school hard courts and greens.
- Phase 3A will include construction of administration, instructional support, special education, elementary science, music, art, and digital media facilities, P.E. offices and lockers, an amphitheater, and a quad. Additionally, a marquee sign will be installed upon completion of the construction of Phase 3A. The proposed marquee sign will include on/off/dimming controls provided by photocells, time clocks, and/or computer controls, and will be generally turned off by 10:00 pm. Phase 3A will include the demolition of eight (8) existing permanent classrooms and the construction of one (1) new permanent classroom.
- Phase 3B will include construction of sidewalk improvements, a field, an ADA ramp and seating to Pioneer Park.
- Phase 4 will include construction of a gym, storage, community rooms, and a stage. Phase 4 will include the demolition of two (2) portable classrooms and the construction of five (5) new permanent classrooms.

Figure 3 depicts a conceptual site plan of the primary features of the proposed project and Figures 4 and 5 depict the architectural renderings of the proposed project. In addition, Figure 6 depicts the proposed exterior lighting plan. Table 1 below identifies the total number of classrooms the campus will have at the end of each phase of the WSM.

Student Enrollment and Capacity

Grant K-8 School is located in the Uptown community of the City of San Diego and serves grades Kindergarten through 8. The existing enrollment capacity of the school is approximately 768 students, with 35 classrooms. However, it should be noted that the school is not currently operating at full enrollment capacity. The existing enrollment at Grant K-8 School is approximately 717 students (academic year 2014-15). The proposed WSM of the existing campus would replace existing classrooms with new modernized classrooms and would not result in a net change in the number of classrooms. Upon completion of the WSM, the enrollment capacity of the school would be approximately 770 students with 35 classrooms. While the estimated enrollment capacity would minimally increase (less than 1% from existing), projected future enrollment of the school would remain below 770 students. Due to the minimal increase in the estimated enrollment capacity of the school (less than 1% from existing), it is stated throughout this document that the proposed project would not result in an increase in enrollment capacity. As such, the proposed project would not increase the existing school’s enrollment capacity or the net number of classrooms.

**Table 1
Classroom Count and Enrollment Capacity by Phase**

	Number of Classrooms	Enrollment Capacity
Existing	35	768
Phase 1	35	770
Phase 2*	39	770
Phase 3	32	770
Phase 4	35	770

Notes: *Phase 2 is considered swing space and would not result in a change in the enrollment capacity of the school.
All portable and relocatable classrooms would be replaced by permanent classrooms upon completion of Phase 4 of the WSM.

Slope Repair

In addition to the WSM project, as a separate project the District is reconstructing an eroding slope behind the school site, particularly the southern and eastern slopes, and replacing some paved areas. This project encroaches into some undeveloped and undisturbed land, but is located entirely within the District’s property. However, the slope repair project was analyzed separately from the proposed project, and is not analyzed within this document. A Notice of Exemption (NOE) was prepared and filed by the District on October 10, 2014 for the slope repair project. Construction of the slope repair project is anticipated to be completed in late 2015.

Relocation of Portable Classroom Buildings

Prior to commencing construction of Phase 1A of the WSM, two portable structures will be removed from the campus. The class materials and furniture from the two removed portables will be relocated to two existing portables on the east edge of the campus. In addition, three middle school classrooms and one portable restroom (including the required infrastructure) will be relocated within the developed portion of the existing campus. Minimal trenching work would be required. A NOE was prepared and filed by the District on March 27, 2015 for this work, which is anticipated to be completed by mid August of 2015.

Project Design Features – CHPS Criteria and Green Building Standards Code

The proposed project would be developed to meet some of the California Collaborative for High Performance Schools (CHPS) criteria. The criteria addresses site and materials selection, energy and water efficiency, indoor environmental quality and provides sustainable policies and innovations that can be adopted by schools and districts. The CHPS criteria provide regulations to encourage public school districts to incorporate 'green' high performance features in their facilities.

California has adopted the Green Building Standards Code, also known as the CalGreen Code. CalGreen is a mandatory code, effective on January 1, 2011, which requires all new buildings in the state to be more energy efficient and environmentally responsible. The regulations would achieve major reductions in greenhouse gas emissions, energy consumption and water use. The CHPS criteria were recently amended to incorporate the CalGreen Code regulations. The proposed project includes, but is not limited to, the following high performance attributes that meet the CHPS criteria and CalGreen Code:

- Locating buildings within 1/8 mile walking distance of one or more public bus stops;
- Reducing heat islands by providing shade on at least 50% of non-roof, paved impervious or pervious surfaces on site, including parking lots, walkways, plazas, etc.;
- Reducing potable water use for non-recreational landscaping areas;
- Installing water efficient toilets and urinals to reduce sewage conveyance and potable water usage;
- Achieving 16+% reduction in total net energy use from Title 24-2008 baseline;
- Conserving energy loss through building openings with the use of interlocks connected to the heating, ventilation and air conditioning (HVAC) system;
- Installation of a centralized direct digital control Energy Management System to control and monitor the energy use of lighting, HVAC, etc.; and
- Recycling, composting, and/or salvaging at least 50% of non-hazardous construction and demolition debris;

Construction Schedule

Construction of the proposed project would include grading operations, underground utility construction, structure construction, and surface paving operations. Construction of the proposed project would occur between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday, in accordance with City of San Diego operational requirements for construction. Relocation of portable classrooms is scheduled to occur in June of 2015. Construction of Phase 1A is anticipated to occur from winter of 2015 to summer of 2018. Phases 1B through 4 will be constructed upon availability of funding.

9. Surrounding Land Uses and Setting: *(Briefly describe the project's surroundings.)*

The project site is located in a relatively built-out urban area and is surrounded by residential as well as open space uses. The project site is bound by single- and multi-family residential on the north and east, Pioneer Park on the west, and an open space canyon and Washington Street on the south.

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

Office of the Division of State Architect (DSA) – Compliance

Other authorities having jurisdiction (i.e., City of San Diego, Federal Aviation Administration (FAA), etc.)

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

- | | | |
|---|---|---|
| <input type="checkbox"/> Aesthetics | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality |
| <input type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources | <input type="checkbox"/> Geology and Soils |
| <input type="checkbox"/> Greenhouse Gas Emissions | <input checked="" type="checkbox"/> Hazards and Hazardous Materials | <input type="checkbox"/> Hydrology and Water Quality |
| <input type="checkbox"/> Land Use and Planning | <input type="checkbox"/> Mineral Resources | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Population and Housing | <input type="checkbox"/> Public Services | <input type="checkbox"/> Recreation |
| <input type="checkbox"/> Transportation/Traffic | <input type="checkbox"/> Utilities and Service Systems | <input type="checkbox"/> Mandatory Findings of Significance |

DETERMINATION:

On the basis of this initial evaluation:

- I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- I find that although the proposed project could have a significant effect on the environment, there WILL NOT be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated impact" on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier 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

July 24, 2015

Date

Gary Stanford

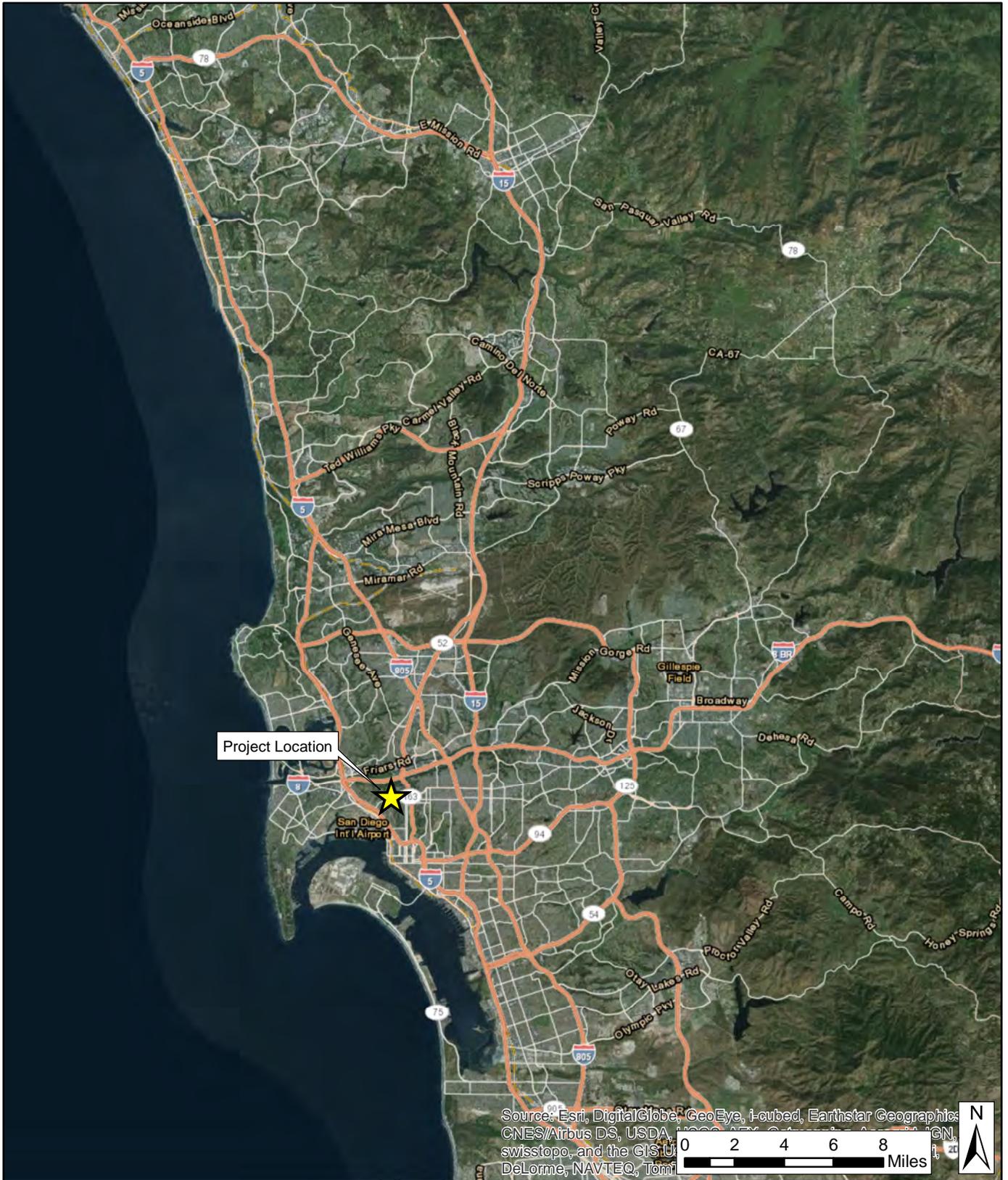
Printed Name

San Diego Unified School District

For

Evaluation of Environmental Impacts:

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



SOURCE: Esri, 2015; BRG Consulting, Inc., 2015

2/18/15



Grant K-8 School Whole Site Modernization

Regional Location

FIGURE

1



SOURCE: Esri, 2015; Roesling Nakamura Terada Architects, 2015

2/18/15

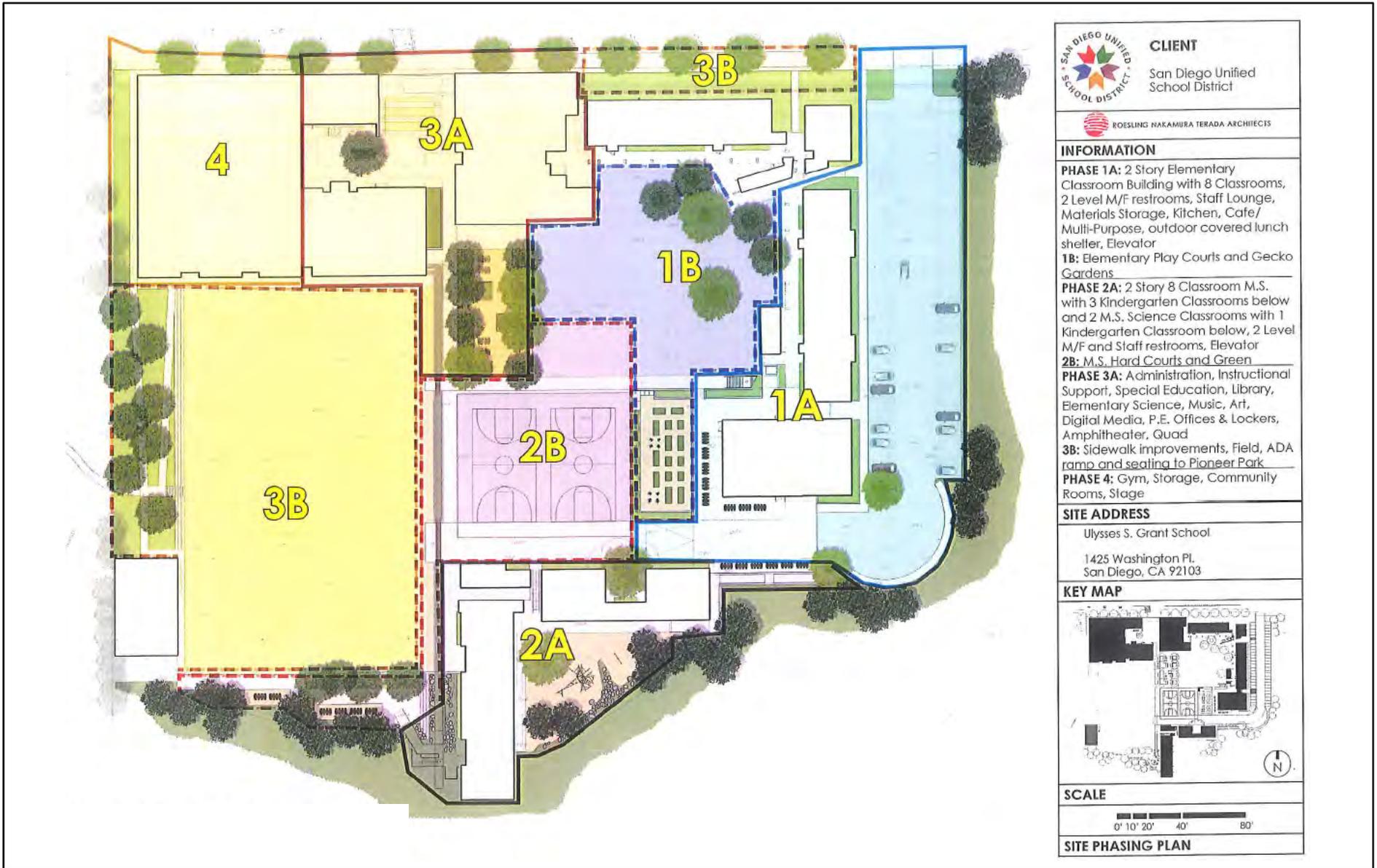


Grant K-8 School Whole Site Modernization

Project Location

FIGURE

2



SOURCE: Roesling Nakamura Terada Architects, 2015

2/18/15

Grant K-8 School Whole Site Modernization

Conceptual Site Plan

FIGURE

3





SOURCE: Roesling Nakamura Terada Architects, 2015

2/18/15



Grant K-8 School Whole Site Modernization

Architectural Rendering 1

FIGURE

4



SOURCE: Roesling Nakamura Terada Architects, 2015

2/18/15

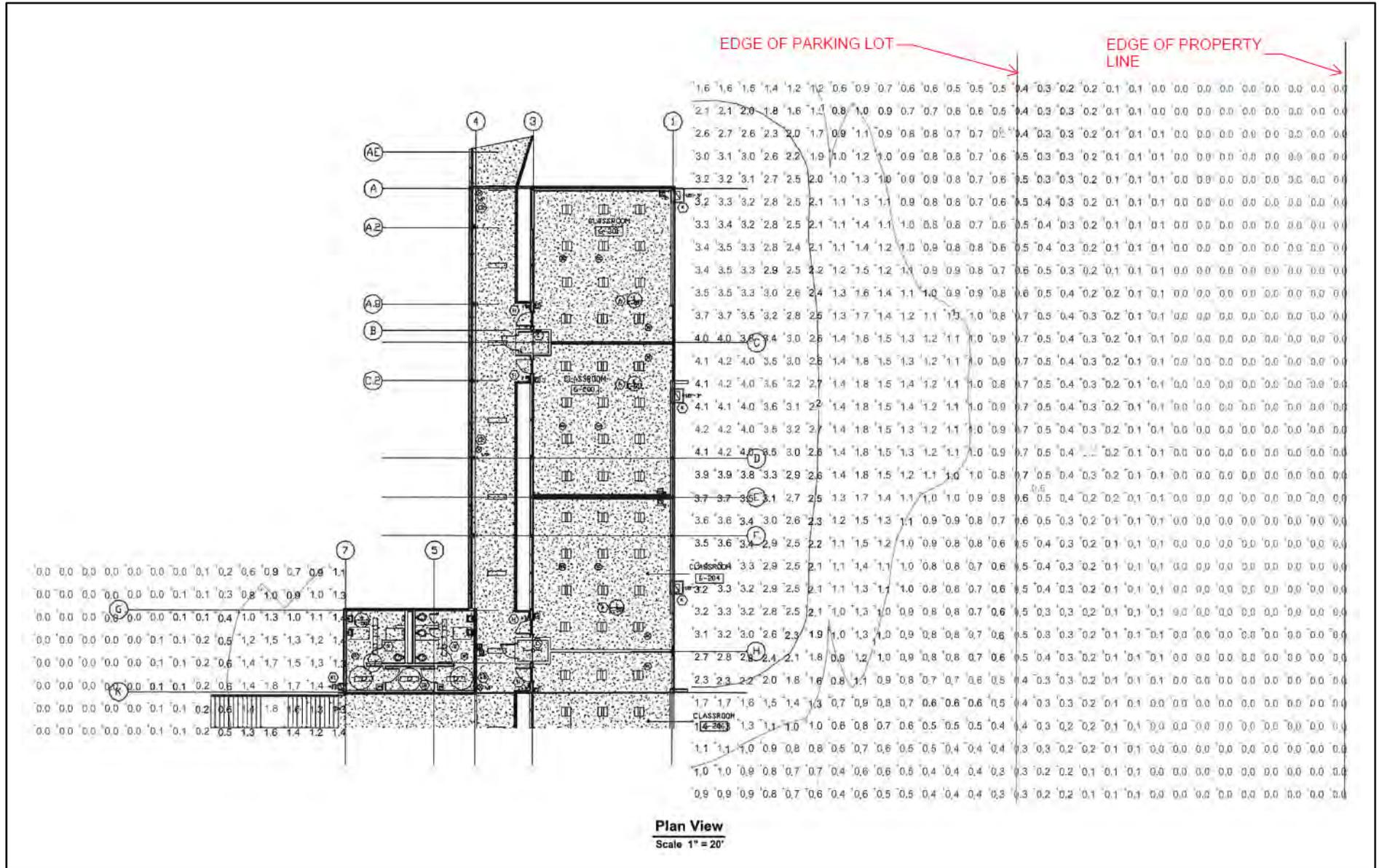


Grant K-8 School Whole Site Modernization

Architectural Rendering 2

FIGURE

5



SOURCE: Turpin & Rattan Engineering, 2015

2/18/15

Grant K-8 School Whole Site Modernization

Exterior Lighting Plan

FIGURE

6



	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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I. AESTHETICS. Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. The existing campus is comprised of one- and two-story buildings. The proposed project includes the construction of new two-story buildings and one three-story building to replace existing one- and two-story buildings on the campus. However, the new three-story building would generally have the same finished floor elevation as the new two-story buildings due to the varying topography of the site. Additionally, there are no scenic vistas in the vicinity of the project site that would be obstructed by the proposed project. Therefore, no impact is identified for this issue area.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

The project site is located within an urbanized area, with no designated scenic highways, or scenic resources within the vicinity of the proposed project. The project activities would occur within the existing school campus. Therefore, no impact is identified for this issue area.

c) Substantially degrade the existing visual character or quality of the site and its surroundings?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project is the modernization of the existing school campus located in an urbanized area. The majority of the existing campus consists of portable and relocatable classroom structures. The proposed project would improve the visual character and quality of the site by constructing new buildings with a modern appearance. The new buildings would be built at a similar scale as the existing school buildings that are located on the northeast corner of the campus. Architectural renderings for the proposed project are provided as Figures 4 and 5. Therefore, the proposed project would not degrade the existing visual character of the surrounding area and a less than significant impact is identified for this issue area.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. As part of the project, lighting would be installed on the buildings for safety and security (as shown on Figure 6). However, all lighting would be directed downward or at a narrow beam angle, in order to focus all light within the campus. All lighting would comply with the City of San Diego regulations and would not be substantially different than the existing lighting on the campus and the surrounding area. As shown on Figure 6, exterior lighting levels would equal 0.0 horizontal foot-candles at the edge of the property line. In addition, a marquee sign will be installed upon completion of the construction of Phase 3A. However, the proposed marquee sign will include on/off/dimming controls provided by photocells, time clocks, and/or computer controls, and will be generally turned off by 10:00 pm consistent with current operations at other District schools. Furthermore, per District Policy No. 5000, the facility shall be in total darkness after hours. Custodians are required to turn off all interior and exterior lights prior to securing the site for the night. These policies would continue to be implemented with the proposed project consistent with current operations at the existing school and would not introduce new sources of nighttime lighting. Therefore, the proposed project would not create a new source of substantial light or glare that would adversely affect day or nighttime views in the area, and a less than significant impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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II. AGRICULTURE AND FORESTRY RESOURCES.

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California 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 Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Based on the farmland maps prepared by the California Department of Conservation (2010), the project site is not identified as containing Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. The project is located within an urbanized area and there are no existing agricultural lands or agricultural uses on-site. Therefore, there would be no impact to Prime Farmland, Unique Farmland, or Farmland of Statewide Importance.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is not zoned for agriculture and is not under a Williamson Act contract. Therefore, no impact is identified for this issue area.

- 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))?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project is located within an urbanized area. There are no existing forest lands, timberlands, or timberland zoned Timberland Production either on-site or in the immediate vicinity that would conflict with existing zoning or cause rezoning. Therefore, no impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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d) Result in the loss of forest land or conversion of forest land to non-forest use?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project is located within an urbanized area. There are no existing forest lands either on-site or in the immediate vicinity. The proposed project would not result in the loss of forest land or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue area.

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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

The proposed project is located within an urbanized area; there are no existing agricultural and forest land or uses either on-site or in the immediate vicinity. The proposed project would not involve any other changes that could result in conversion of farmland to non-agricultural use or conversion of forest land to non-forest use. Therefore, no impact is identified for this issue area.

III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

The proposed project is located within the San Diego Air Basin (SDAB), which is currently listed as a federal nonattainment area for ozone (8-hour) and a state nonattainment area for ozone (1-hour and 8-hour), PM₁₀, and PM_{2.5}. As such, the project site is located in an area where a regional air quality plan is being implemented. The proposed project would not increase enrollment capacity or the number of faculty on-site. In addition, the proposed project would not result in an increase in the population of the SDAB. Furthermore, based on the Air Quality and Greenhouse Gas Assessment prepared for the project (Appendix A of this Initial Study), no significant, long-term air quality impacts have been identified. As such, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan, and no impact is identified for this issue area.

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The following information is summarized from the Air Quality and Greenhouse Gas Assessment prepared by Rincon Consultants, Inc., dated July 2015. This report is provided as Appendix A of this Initial Study.

Construction Emissions

Based on the Air Quality and Greenhouse Gas Assessment (Appendix A of this Initial Study), the proposed project would generate minimal temporary air pollutant emissions associated with construction equipment exhaust, fugitive dust, and architectural coatings. Please refer to Table 5 of the Air Quality and Greenhouse Gas Assessment for a detailed description of the construction phase emissions. The level of emissions generated during the construction phase of the project would be minimal and would not exceed San Diego Air Pollution Control District (SDAPCD) significance thresholds, California Ambient Air Quality Standards (CAAQS) or National Ambient Air Quality Standards (NAAQS). Therefore, less than significant air quality impacts are expected during the construction phase of the project.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Operational Emissions

Based on Table 6 of the Air Quality and Greenhouse Gas Assessment (Appendix A of this Initial Study), the proposed project would generate operational emissions similar to those of the existing school. The level of operational emissions associated with vehicular trips, landscaping and architectural coating emissions as the structures are repainted over the life of the development, and energy sources (electricity and natural gas) would not exceed SDAPCD significance thresholds, CAAQS or NAAQS. Therefore, less than significant air quality impacts are expected during the operational phase of the project.

Conclusion

The estimated construction and operational emission levels produced by the proposed project are provided in Tables 5 and 6, respectively, of the Air Quality and Greenhouse Gas Assessment (Appendix A of this Initial Study). Based upon the findings, no construction or operational air quality impacts are anticipated during either phase of the project. In addition, the proposed project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. Therefore, a less than significant impact is identified for this issue area.

- c) 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 (including releasing emissions which exceed quantitative thresholds for ozone precursors)?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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Please see III a) and b) above. The project site is located in the central portion of the SDAB, which is currently listed as a federal nonattainment area for ozone (8-hour) and a state nonattainment area for ozone (1-hour and 8-hour), PM₁₀, and PM_{2.5}. As discussed in III b) above, the proposed project would not result in air quality impacts during either the construction or operational phases of the project. Therefore, the proposed project would not result in a cumulatively considerable net increase in any criteria pollutants for which the SDAB is nonattainment under or violate air quality standards. Therefore, a less than significant impact is identified for this issue area.

- d) Expose sensitive receptors to substantial pollutant concentrates?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
--------------------------	--------------------------	-------------------------------------	--------------------------

Single- and multi-family residential dwelling units are located north and east of the project site. In addition, Pioneer Park is located west of the project site. However, as discussed in III b) above, the proposed project would result in less than significant air quality impacts during the construction or operational phases of the project. As such, the proposed project would not expose sensitive receptors to substantial pollutant concentrations and a less than significant impact is identified for this issue area.

- e) Create objectionable odors affecting a substantial number of people?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

The proposed project would not include industrial or agricultural uses that have the potential to emit objectionable odors. The proposed project would replace the existing school facilities with new school buildings and outdoor areas. As such, the proposed project would not create or emit objectionable odors that may affect a substantial number of people. Therefore, no impact is identified for this issue area.

IV. BIOLOGICAL RESOURCES. Would the project:

- a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies,

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. Based on a review of data available from SanGIS, the project site is considered urban/developed. According to the Biological Letter Report prepared for the slope repair project of the adjacent hillside (Appendix B of this Initial Study), the project site does not provide any habitat for candidate, sensitive, or special status species. In addition, although the proposed project would encroach minimally into undisturbed portions of the adjacent open space canyon, the canyon does not support sensitive species due to its disturbed and fragmented nature (Rocks, 2014). Furthermore, no threatened, endangered, or sensitive animal or plant species were observed on-site during general biological surveys conducted for the Biological Letter Report. Since no candidate, sensitive, or special status species are located on or adjacent to project site, no direct or indirect impacts would occur. Therefore, no impact is identified for this issue area.

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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. According to the Biological Letter Report prepared for the slope repair project of the adjacent hillside (Appendix B of this Initial Study), there are no riparian habitats or other sensitive natural communities within or in the vicinity of the project site. Therefore, no impact is identified for this issue area.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. The project site does not contain any federally protected wetlands as defined by Section 404 of the Clean Water Act. Therefore, no impact is identified for this issue area.

d) Interfere substantially with 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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

The proposed project would occur entirely within the premises of the existing school campus within an urbanized area, and is not a wildlife corridor used by migratory fish or wildlife species. Although the adjacent open space canyon contains Eucalyptus trees that have the potential to support nests protected under the Migratory Bird Treaty Act (MBTA), the proposed project does not include the removal of any such Eucalyptus trees. Therefore, no impact is identified for this issue area.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
--------------------------	--------------------------	--------------------------	-------------------------------------

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The proposed project would occur entirely within the premises of the existing school campus within an urbanized area and would not affect sensitive biological resources or involve the removal of any native tree species. In addition, the project site is not located within or adjacent to any Multi-Habitat Planning Area (MHPA) (Rocks, 2014). Furthermore, as stated in IV.a) above, no candidate, sensitive, or special status species are located on or adjacent to the project site. As such no direct or indirect impacts to biological resources would occur. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, and no impact is identified for this issue area.

- 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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. The project site is not located within or adjacent to any MHPA lands. As such, the proposed project would not conflict with the City of San Diego's Multiple Species Conservation Program (MSCP) Subarea Plan, which serves as the City's Natural Community Conservation Plan (NCCP). Therefore, no impact is identified for this issue area.

V. CULTURAL RESOURCES. Would the project:

- a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The following information is summarized from the Cultural and Historical Resources Existing Conditions Report dated July 22, 2014, and Historical Resources Evaluation (HRE) Report dated March 2015, prepared by ASM Affiliates, Inc. These reports are provided as Appendices C1 and C2, respectively of this Initial Study.

A records search was conducted at the South Coastal Information Center (SCIC) on July 2, 2014. The SCIC records search indicated that there are 15 previously recorded cultural resource sites and 212 historic addresses within a half-mile radius of the project site; however none were identified as intersecting the proposed project area. The cultural and historical resources survey identified two structures as potentially eligible for listing to the California Register of Historic Resources (CRHR) based on age criteria (older than 45 years), including the Recreation Center and Kindergarten building. According to the Cultural and Historical Resources Report, the Recreation Center was constructed in 1917, and the Kindergarten building was constructed in 1956. However, the Recreation Center would not be altered or demolished as part of the proposed project. In addition, the Grant K-8 school campus was identified as a potentially eligible historic district due to the campus' original date of construction and its association with the architectural firm of T.C. Kistner, Wright and Wright. As a result, a detailed HRE was conducted to determine the historical significance, if any, of the Kindergarten building and rest of the campus.

A detailed survey of the Kindergarten building was conducted as part of the HRE on October 27, 2014. Archival research and review of secondary sources was also conducted to develop a complete history of the site. Based on the results of the HRE, it was determined that the Kindergarten building is not recommended as eligible for the CRHR or the San Diego Register, either individually or as a contributor to a potential historic district. Although the building is associated with the historic theme of Education, sub-theme Post-War Growth in the San Diego Unified School District Population (1945-1960), this individual classroom building is not an adequate representation of this theme on its own. In addition, none of the other buildings on the campus were constructed during this period of significance; thus the school is not considered a potential historic district. As such, the Kindergarten building and the rest of the Grant K-8 campus are not considered historical resources in accordance with CEQA. Therefore, the proposed project is not anticipated to alter the historic context of the area, and no significant impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Cause a substantial adverse change in the significance of an archaeological resource as defined in §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. As stated above, a records search was conducted at SCIC indicated that there are 15 previously recorded cultural resource sites within a half-mile radius of the project site; however none were identified as intersecting the proposed project area (ASM, 2014). The project site has been substantially disturbed by grading activities associated with previous development of the school. Any significant archaeological resources would have likely been unearthed during past grading of the school. Minimal grading would be necessary for the proposed project, further reducing the potential that archaeological resources could be directly or indirectly impacted. Therefore, a less than significant impact is identified for this issue area.

c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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According to geologic mapping of the site, the project site is underlain with very old Paralic deposits (Qvop), which are broadly correlated with the Lindavista Formation (California Geological Survey, 2008). The Lindavista Formation has a moderate sensitivity for paleontological resources (Deméré, 1993). Paleontological resources are typically impacted when earthwork activities such as mass excavation and grading cut into geological deposits (formations) within which fossils are buried. Construction of the proposed project would require a significant amount of grading over the entire duration of the project (Phases 1 – 4). Although, the project site has been substantially disturbed by grading activities associated with previous development of the school, there is the potential that grading and excavation for the proposed project could penetrate the moderately sensitive Lindavista Formation. Such grading and excavation could potentially destroy previously undiscovered paleontological resources, which would be considered a significant impact. However, with implementation of Mitigation Measure CR-1, impacts to paleontological resources would be reduced to a level less than significant.

Mitigation Measure CR-1:

Prior to site grading, a qualified paleontologist (a qualified paleontologist is defined as an individual with a minimum MS or Ph.D. in paleontology or geology who is familiar with paleontological procedures and techniques, who is knowledgeable in the geology and paleontology procedures and techniques, and who has worked as a paleontological mitigation project supervisor in the County for at least 1 year) shall be retained by the District to prepare a Paleontological Assessment Report that includes record searches and reviews of the existing literature for the project area in order to determine the likelihood of fossils being impacted. If the report identifies impacts on highly sensitive paleontological deposits that cannot be avoided, the following additional measures shall be implemented to recover remains before they are lost or destroyed:

- The qualified paleontologist shall be present at the pre-construction meeting to consult with the grading and excavation contractors.
- If highly sensitive fossil-bearing deposits are likely to be impacted and the proposed construction methodology would allow for the recovery of fossils, then the following measures would be incorporated into the project Mitigation and Monitoring Reporting Program (MMRP).
 - If mitigation is necessary, then a Qualified Paleontologist shall attend pre-construction meetings to consult with the grading and excavation contractors concerning excavation schedules, paleontological field techniques, and safety issues.
 - A paleontological monitor shall be on-site on a full-time basis during the original cutting of previously undisturbed deposits of high sensitivity formations to inspect exposures for contained fossils. The paleontological monitor shall work under the direction of a qualified paleontologist. A paleontological monitor is defined as an individual who has experience in the collection and salvage of fossil materials.
 - If discovered, the Qualified Paleontologist (or Paleontological Monitor) shall recover fossils. In most cases, this

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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fossil salvage can be completed in a short period of time. However, some fossil specimens, such as complete large mammal skeleton, may require an extended salvage period. In these instances the Qualified Paleontologist (or Paleontological Monitor) shall be allowed to temporarily direct, divert, or halt grading to allow recovery of fossil remains in a timely manner. Because of the potential for the recovery of small fossil remains, such as isolated mammal teeth, it may be necessary in certain instances, to set up a screen-washing operation on the site.

- Fossil remains collected during the monitoring and salvage portion of the mitigation program shall be cleaned, repaired, sorted, and cataloged.
- Prepared fossils, along with copies of all pertinent field notes, photos, and maps, shall either be deposited (as a donation) in a scientific institution with permanent paleontological collections such as the San Diego Natural History Museum. Donation of the fossils shall be accomplished by financial support for initial specimen storage.
- A final summary report shall be completed and retained on file at the District that outlines the results of the mitigation program. This report shall include discussions of the methods used, stratigraphic section(s) exposed, fossils collected, and significance of recovered fossils.

d) Disturb any human remains, including those interred outside of formal cemeteries?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. The project site has been substantially disturbed by grading activities associated with previous development of the school. It is unlikely that any human remains would be found or disturbed. However, Mission Hills Calvary Cemetery (currently known as Pioneer Park) was located adjacent to the western boundary of the existing school campus. According to the HRE Report (Appendix C2 of this Initial Study), many early cemeteries were created on an as-needed basis, resulting in haphazardly placed burial plots and no formally surveyed and delineated cemetery boundaries. As such, it is possible that portions of the school site were used for burials at some time in the past, and human remains may potentially be present on the existing campus. However, the HRE Report concluded that the early designation of the area as a cemetery and the official survey and delineation of the cemetery boundaries and adjoining parcels by the City of San Diego in 1875 makes it unlikely that unknown burials extend into the proposed project area. In addition, the topography of the project area also makes it unlikely that human remains were interred outside of the surveyed boundaries of the Mission Hills Calvary Cemetery and within the project area. Furthermore, a review of historical newspaper records did not identify any burials that were disturbed during any of the previous construction projects within the school grounds. Therefore, the Mission Hills Calvary Cemetery would not be disturbed by the proposed project, and no impact is identified for this issue area.

VI. GEOLOGY AND SOILS. Would the project:

a) Expose people or structures to 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 known fault? Refer to Division of Mines and Geology Special Publication 42.

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is not located within an Alquist-Priolo Earthquake Fault Zone (California Geological Survey, 2010). Therefore, no impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
ii) Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The project site, like all of San Diego County, is in a seismically active area. The site is located in the Peninsular Range Geomorphic Province, which is identified by rugged, northwest trending mountain ranges to the east and coastal plains to the west. Several earthquake fault zones exist in the region creating the potential for earthquake damage on-site. No active or potentially active faults are located within the project site. However, the Rose Canyon fault is located approximately 1.5 miles south-southwest of the project site (SanGIS, 2009, City of San Diego, 2008b). The Rose Canyon fault is an active fault capable of generating an earthquake of magnitude 6.2 to 7.0 on the Richter Scale (City of San Diego, 2007). Due to the project site's proximity to this fault and general location within a seismically active region, it is likely that the project site would experience at least one moderate to major earthquake during the design life of the facilities, which is considered a significant impact. However, mandatory compliance with the Title 24 standards of the current Uniform Building Code (UBC) during the design and construction of the project would minimize seismic ground shaking effects in the event of a major earthquake. Therefore, a less than significant impact is identified for this issue area.

iii) Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See VI a) ii. Liquefaction can occur when loose sandy soils combine with a shallow groundwater table. The project site is underlain with urban land (Ur), which is not considered to be an expansive soil (USDA, 1973). In addition, groundwater was not encountered during subsurface investigations conducted for the slope repair project for the adjacent eroding hillside (Ninyo & Moore, 2012). Therefore, a less than significant impact is identified for this issue area.

iv) Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. No landslides have been encountered at the site or adjacent properties that may affect the site. The 2008 City of San Diego Seismic Safety Study references the site as "Category 52 – Other level areas, gently sloping to steep terrain, favorable geologic structure, and low risk." Therefore, a less than significant impact is identified for this issue area.

b) Result in substantial soil erosion or loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. According to the USDA Soil Survey, the proposed project site is underlain with Ur, which consists of closely built-up areas in cities where buildings, streets, and sidewalks cover almost the entire surface. The soil has been so altered by urban works that identification is not feasible (USDA, 1973). Therefore, a less than significant impact is identified for this issue area.

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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See VI a) ii), iii) and iv). Therefore, a less than significant impact is identified for this issue area.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. The project site is underlain with Ur, which is not considered to be an expansive soil (USDA, 1973). In addition, adherence with the standards of the current UBC and Standard Engineering Methods for Expansive Soils during the design and construction of the project would ensure that the proposed development would not be affected by any expansive soils encountered on-site. Therefore, a less than significant impact is identified for this issue area.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project does not include the use of septic tanks. The proposed project would occur entirely within the existing school campus, which currently utilizes the City's wastewater disposal network. The new modernized campus would be connected to this system and would not require an alternative wastewater disposal system. Therefore, soil suitability for wastewater disposal is not an issue and no impact is identified for this issue area.

VII. GREENHOUSE GAS EMISSIONS. Would the project:

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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California adopted Assembly Bill 32 (AB 32), the Global Warming Solutions Act, in 2006. The law requires the California Air Resources Board (CARB) to adopt regulations to require reporting and verification of statewide greenhouse gas (GHG) emissions and to monitor and enforce compliance with that program. As part of this effort, CARB will adopt a statewide GHG emissions limit equivalent to the statewide GHG emissions levels in 1990, to be achieved by 2020.

Senate Bill 97 (SB 97), signed in August 2007, acknowledges that climate change is an environmental issue that requires analysis in CEQA documents. Pursuant to SB 97, the Resources Agency adopted amendments to the State CEQA Guidelines which provide general regulatory guidance on the analysis and mitigation of GHG emissions in CEQA documents, while giving lead agencies the discretion to set quantitative or qualitative thresholds. As the CEQA lead agency for the proposed project, the District does not have significance thresholds for GHG emissions. However, the City of San Diego (City) has developed interim guidelines, which were used in this analysis. In 2010, the City released a memorandum titled *Addressing Greenhouse Gas Emissions from Projects Subject to CEQA*, which provides a 900 metric ton of carbon dioxide equivalent (MTCO₂e) screening threshold for determining when a GHG analysis is required. The 900 MTCO₂e screening threshold is based on available guidance from the California Air Pollution Control Officer Association (CAPCOA) white paper. If GHG emissions associated with a proposed project exceed the 900 MTCO₂e screening threshold, the project would have a significant impact related to climate change unless the project reduces emissions by at least 28.3% from the CARB 2020 "business-as-usual" (BAU) forecast model.

Based on the Air Quality and Greenhouse Gas Assessment (Appendix A of this Initial Study), the combined construction, stationary and mobile source emissions for the proposed project would total approximately 1,370.4 MTCO₂e, which would exceed the 900 MTCO₂e screening threshold assuming unmitigated BAU emissions. As such, the proposed project must demonstrate a reduction in BAU emissions by 28.3% to avoid a significant GHG emissions impact. However, the BAU calculations for the proposed project are an estimate of BAU emissions that would be expected to occur without implementation of any GHG reducing features or mitigation, consistent with AB 32. As further detailed in the Air Quality and Greenhouse Gas Assessment, implementation of design features and State reduction measures would have a combined total reduction rate of 30.28% compared to the BAU scenario. As such, GHG emissions associated with the proposed project would be reduced by more than 28.3% as compared to the BAU scenario.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Furthermore, as described in the project description, the proposed project would be designed to comply with the CalGreen Code and would various CHPS criteria. The proposed project is located in proximity to existing public transportation and would facilitate both bicycle and pedestrian access. It would also minimize energy consumption, including transportation energy, water conservation and solid waste reduction through building siting, orientation, and design. The proposed project would also include additional high performance attributes that promote energy efficiency and improve indoor air quality, ultimately reducing the project's GHG emission contribution. These design measures would promote land use alterations that limit GHG emissions and reduce wasteful, inefficient and unnecessary energy consumption. Additionally, the proposed project would be required, through permit conditions, to be designed to comply with requirements of Part 6, Title 24 of the California Building Standards Code – California Energy Code. The proposed project would be consistent with the Climate Change and Sustainable Policies of the City's General Plan, as well as with the OPR strategies identified in the Air Quality and Greenhouse Gas Assessment (Appendix A). As such, the proposed project would be consistent with all applicable GHG reduction plans, policies and regulations, including the objectives of AB 32, SB 97, SB 375, and the CHPS program. Therefore, the proposed project is not anticipated to generate a substantial amount of greenhouse gas emissions, and a less than significant impact is identified for this issue area.

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

See VII a). As described above, GHG emissions associated with the proposed project would be reduced by 30.28% with the implementation of design features and State reduction measures, which is below the 28.3% threshold for significant GHG emissions impacts. As such, the proposed project is not anticipated to result in a substantial contribution of greenhouse gas emissions. Furthermore, the proposed project would be designed and constructed to comply with the CalGreen Code and would meet various CHPS criteria. Therefore, the proposed project would not conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing greenhouse gas emissions, and a less than significant impact is identified for this issue area.

VIII. 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?

The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. The proposed project would not involve a significant increase in the routine transport, use and disposal of small amounts of hazardous materials currently associated with typical school cleaning and maintenance of the school. The transport, use and disposal of these materials would continue to be handled in compliance with all applicable laws and regulations and would not create a significant hazard to the public or the environment. Therefore, a less than significant impact is identified for this issue area.

- 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?

See VIII a). A less than significant impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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See VIII a) above. The proposed project would not emit hazardous emissions or require the handling of hazardous or acutely hazardous materials or substances. Therefore, a less than significant impact is identified for this issue area.

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?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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Based on a review of the Cortese List data resources (DTSC EnviroStor database; DTSC corrective action sites; Leaking underground storage tank sites from State Water Resources Control Board [SWRCB] GeoTracker database; Solid waste disposal sites identified by SWRCB with waste constituents above hazardous waste levels outside the waste management unit; and "Active" cease and desist orders and cleanup abatement orders from SWRCB), the Grant K-8 School campus is not located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5. However, burned waste was observed on the eroding hillside located adjacent to the southern portion of the school during grading and slope repair activities. There is the potential that burned waste may be present under the school site, and subsequently may be encountered during construction of the proposed project. As such, the proposed project has the potential to result in a significant hazardous waste impact in the event burned waste is encountered during construction. However, implementation of Mitigation Measure HZ-1 would reduce potential hazardous waste impacts to a level less than significant.

Mitigation Measure HZ-1:

In the event burned waste is encountered during construction of the proposed project, that material shall be handled in accordance with state and local laws and regulations and under the oversight of the California Department of Toxic Substances Control (DTSC).

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project site is located less than 2 miles northeast of San Diego International Airport (SDIA), within Review Area 2 of the SDIA Airport Influence Area (AIA) as designated in the Airport Land Use Compatibility Plan (ALUCP) (San Diego County Regional Airport Authority, 2014). As such, the proposed project is subject to the provisions of Federal Aviation Regulations (FAR) Part 77. However, the FAA has determined that the proposed project does not pose a hazard to air navigation. In addition, the proposed project would be designed in conformance with the design regulations for Review Area 2 provided in the ALUCP. The proposed project would not create substantial amounts of glare or lighting nor would it exceed the height limits for the area which would result in a hazard to air navigation. Furthermore, the San Diego County Airport Land Use Commission (ALUC) was consulted and indicated that the FAA's determination of no hazard to air navigation satisfies the consultation requirements provided in the ALUCP, and a consistency determination is not required (Pers. comm., Gowens, November 21, 2014). Therefore, a less than significant impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is not located within the vicinity of a private airstrip and would not result in a safety hazard for people residing or working in the project area. Therefore, no impact is identified for this issue area.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. Access to the campus would continue to be provided from an existing driveway along Washington Place. As such emergency access to the campus would not significantly change with the proposed project. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan, and no impact is identified for this issue area.

h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. However, the project site is located adjacent to an open space canyon and in an area designated as a Very High Fire Hazard Severity Zone (California Department of Forestry and Fire Protection's Fire and Resource Assessment Program, 2007). Nonetheless, the proposed project would be required to comply with all City Fire Codes and Regulations and the City's Brush Management Regulations and Landscape Standards (FPB Policy B-08-1). In addition, the proposed project would be the continuation of an existing use and would not increase enrollment capacity or the number of faculty on site. As such, the proposed project would not expose any additional students or faculty to fire hazards associated with adjacent wildlands. Therefore, a less than significant impact is identified for this issue area.

IX. HYDROLOGY AND WATER QUALITY. Would the project:

a) Violate any water quality standard or waste discharge requirement?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project site is located within the Pueblo San Diego Hydrologic Unit, San Diego Mesa Hydrologic Area, Lindbergh Hydrologic Subarea (908.21) (RWQCB, 2011). The nearest receiving water body is the San Diego Bay. According to the California 303(d) list published by the San Diego Regional Water Quality Control Board (RWQCB), the San Diego Bay is listed as impaired for the following:

- Benthic Community Effects
- Sediment Toxicity
- Copper
- Total and Fecal Coliform
- Enterococcus
- Mercury

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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- Polycyclic Aromatic Hydrocarbons
- Polychlorinated Biphenyls
- Zinc
- Chlordane

The proposed project would occur entirely within the premises of the existing school campus within an urbanized area and would not create additional impermeable surface area. In addition, the proposed project would not add a substantial amount of contaminants that would violate any water quality standard or waste discharge requirements. However, construction of the proposed project has the potential to impact water quality by potentially increasing erosion during construction and transporting construction-related debris into downstream surface waters. The proposed project would be required to comply with all storm water quality standards during and after construction. For each phase of the proposed project, a Storm Water Pollution Prevention Plan (SWPPP) would be required. In addition, the proposed project would implement standard Best Management Practices (BMPs), as identified in the SWPPP, during construction and operation to ensure the project does not violate any water quality standards. Therefore, a less than significant impact is identified for this issue area.

- b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project does not propose to use groundwater. In addition, the proposed project would occur entirely within the premises of the existing school campus and would not result in an increase in the amount of impermeable surface area affecting groundwater recharge. Therefore, a less than significant impact is identified for this issue area.

- c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is currently developed and is located within the existing school campus in an urbanized area. There are no natural drainage courses on, or immediately adjacent to, the project site. The proposed project would not result in an alteration of existing drainage courses or substantial alteration of topography of the area. Any runoff from the site would continue to be accommodated by the existing on-site drainage system. Therefore, implementation of the project would not result in substantial erosion or siltation impacts on- or off-site. No impact is identified for this issue area.

- d) Substantially alter the existing drainage pattern of the site or area, including through alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is currently developed and is located within the existing school campus in an urbanized area. There are no streams or rivers on or adjacent to the project site. The proposed project would not result in an alteration of existing drainage courses or substantial alteration of topography of the area. Any runoff from the site would continue to be accommodated by the existing on-site drainage system. Therefore, no impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

The proposed project is the WSM of the existing school campus located in an urbanized area. The project site currently drains and would continue to drain into the existing municipal storm drain system located within the project site. The amount of runoff would not substantially change with implementation of the proposed project and there would be no additional source of polluted runoff. Therefore, a less than significant impact is identified for this issue area.

f) Otherwise substantially degrade water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project is the WSM of the existing school campus located in an urbanized area. The project area drains into the existing municipal storm drain system and there are no natural drainages on or adjacent to the project site. In addition, there are no new uses or operations proposed which would degrade water quality. Therefore, no impact is identified for this issue area.

g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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Based on the Federal Emergency Management Agency Flood Insurance Rate Map (FEMA, 2012), the project site is not located within a 100-year flood hazard area. The proposed project is the WSM of the existing school campus and does not include development of housing. Therefore, no impact is identified for this issue area.

h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See IX g). The project site is not located within an identified 100-year flood hazard area (FEMA, 2012). Therefore, no impact is identified for this issue area.

i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is not located within a 100-year flood hazard (FEMA, 2012), nor located near any levee or dam. Therefore, no impact is identified for this issue area.

j) Inundation by seiche, tsunami, or mudflow?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The project site is located inland and is not located in the vicinity of any major water body that would result in inundation by seiche, tsunami or mudflow. Therefore, no impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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X. LAND USE AND PLANNING. Would the project:

- | | | | | |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Physically divide an established community? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|--|--------------------------|--------------------------|--------------------------|-------------------------------------|

The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. The school has been located on this site for over a century (originally opened in 1914), making it part of the community. As such, the proposed project would not divide an established community. Therefore, no impact is identified for this issue area.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. The project would not expand the footprint of the campus and is consistent with the project site's City of San Diego General Plan land use designation of School. Implementation of the proposed project would not result in any inconsistencies with the advisory land use plans and policies; and, therefore, no significant land use and planning impact has been identified for this issue area.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| c) Conflict with applicable habitat conservation plan or natural community conservation plan? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

See IV. f). The proposed project would occur entirely within the premises of the existing school campus within an urbanized area and is not located within an area under the jurisdiction of the City of San Diego's MSCP Subarea Plan, which serves as the City's NCCP. As such, the proposed project would not conflict with the City's MSCP Subarea Plan. Therefore, no impact is identified for this issue area.

XI. MINERAL RESOURCES. Would the project:

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| a) Result in the loss of availability of a known mineral resource that would be of future value to the region and residents of the state? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. According to the Conservation Element of the City of San Diego General Plan, the project site has a Mineral Land Classification of MRZ-3, which is identified as an area containing mineral deposits the significance of which cannot be evaluated from available data (City of San Diego, 2008a). There are no identified mineral resources that would be affected or "lost" as a result of the project. Therefore, no impact is identified for this issue area.

- | | | | | |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|
| 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? | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
|---|--------------------------|--------------------------|--------------------------|-------------------------------------|

The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. The proposed project would be developed wholly within the existing school site and would not require additional land. There are no locally important mineral resource recovery sites delineated on any local plan, specific plan or general plan, or in the vicinity of the project site. Therefore no impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XII. NOISE. Would the project result in:

- a) Exposure of persons to or generation noise levels in excess of standards established in local general plan or noise ordinance, or applicable standards of other agencies?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The following information is summarized from the Noise Impact Study prepared by Rincon Consultants, Inc., dated July 2014. This report is provided as Appendix D of this Initial Study.

Existing Conditions

Noise is generally defined as loud, unpleasant, unexpected, or undesired sound that is typically associated with human activity and interferes with or disrupts normal activities. The human environment is characterized by a certain consistent noise level, which varies by location and is termed ambient noise. Although exposure to high noise levels has been demonstrated to cause hearing loss, the principal human response to environmental noise is annoyance. The response of individuals to similar noise events is diverse and influenced by the type of noise, perceived importance of the noise and its appropriateness in the setting, time of day and type of activity during which the noise occurs and sensitivity of the individual.

Some land uses are considered sensitive to noise. Noise sensitive areas are land uses associated with indoor and/or outdoor activities that may be subject to stress and/or significant interference from noise. Noise sensitive areas often include residential dwellings, mobile homes, hotels, motels, hospitals, nursing homes, educational facilities and libraries. Industrial and commercial land uses are not generally considered sensitive to noise.

Noise exposure goals for various types of land uses reflect varying noise sensitivities associated with each use. Noise sensitive receptors in the project area include single-family residences located adjacent to and east of the site, as well as to the north of the site across Washington Place. Pioneer Park to the west is also considered a sensitive receptor.

Construction Noise

According to the Noise Impact Study (Appendix D of this Initial Study), the nearest sensitive receptors are single-family residences located approximately 50 feet north and east of the school property. However an existing parking lot located along the eastern boundary would remain in place during construction, which would place the active construction area approximately 100 feet from the nearest receptor. Based on the Noise Impact Study, construction activities could generate noise levels as high as 88 dBA on the project site at a reference distance of 25 feet from the equipment, although sustained noise levels would not be that high. Actual noise levels would fluctuate throughout the day and may periodically exceed 88 dBA depending on the type and location of equipment used and whether multiple pieces of equipment are operating simultaneously in the same area. As such, construction noise could result in a significant temporary increase in noise levels. To avoid, minimize, or reduce construction-related noise impacts, the San Diego Municipal Code (SDMC) Section 59.5.0404 limits construction noise to an average of 75 dBA over a 12-hour period between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday. In addition, temporary construction noise would be further reduced with the implementation of Mitigation Measures N-1 through N-3. Therefore, construction-related noise impacts would be reduced to a less than significant level with mitigation.

Operational Noise

Noise associated with the operations of the proposed project would be substantially lower than the construction noise, consistent with the existing uses on-site, and would not generate noise levels in excess of any established standards. The proposed project would not increase the number of students or faculty onsite; thus, traffic and associated noise would not increase as a result of the proposed project. Therefore, operation of the proposed project would not expose persons to or generate noise levels in excess of standards and a less than significant impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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Conclusion

Construction of the proposed project has the potential to result in significant temporary noise impacts to sensitive receptors located adjacent to the project site. However, construction of the proposed project would occur between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday in accordance with SDMC Section 59.5.0404. In addition, implementation of Mitigation Measures N-1 through N-3 would reduce impacts to a less than significant level. Operational noise levels for the proposed project would be similar to existing noise levels, which do not currently exceed the exterior noise limits for residential uses.

Mitigation Measure N-1:

The construction contractor shall develop and implement a noise control plan that includes a noise control monitoring program to ensure sustained construction noise levels do not exceed 75 decibels over a 12-hour period at the nearest sensitive receivers. The plan may include the following requirements:

- Contractor shall turn off idling equipment.
- Contractor shall perform noisier operation during the times least sensitive to receptors. Internal combustion engines should be equipped with a muffler of a type recommended by the manufacturer and in good repair. All diesel equipment shall be operated with closed engine doors and shall be equipped with factory-recommended mufflers.
- Electrical power shall be used to run air compressors and similar power tools and to power any temporary structures, such as construction trailers or security staff facilities.
- For all noise-generating construction activities, additional noise attenuation techniques shall be employed as necessary to reduce noise levels. Such techniques shall include, but are not limited to, the use of sound blankets on individual pieces of construction equipment, sound absorptive panels, noise shrouds, and temporary sound barriers that meet a sound transmission class (STC) rating of 25 between construction sites and nearby sensitive receptors as specified in the noise control plan. Stationary noise-generating equipment, such as generators and compressors, should be located as far as practically possible from the nearest residential property lines.

Mitigation Measure N-2:

The construction contractor shall limit the number of large pieces of equipment (i.e., bulldozers or concrete mixers) operating adjacent to sensitive receptors (i.e., residential homes) to one at any given time.

Mitigation Measure N-3:

The District shall provide notification to residential occupants adjacent to the project site at least 24 hours prior to initiation of construction activities that could result in substantial noise levels at outdoor or indoor living areas. This notification should include the anticipated hours and duration of construction and a description of noise reduction measures being implemented at the project site. The notification should include a telephone number for local residents to call to submit complaints associated with construction noise.

b) Exposure of persons to or generation excessive groundborne vibrations or groundborne noise levels?

Please see XII a) above. Operational activities associated with the proposed project would be the same as those that currently occur under existing conditions. As such, the proposed project would not result in any operational groundborne vibration or noise impacts. As discussed under XII a) above, the nearest sensitive receptors are single-family residences located approximately 50 feet north and east of the school property. Based on the Noise Impact Study, construction of the proposed project could potentially generate groundborne vibrations at a maximum level of 87 VdB at a distance of 25 feet and 81 VdB at a distance of 50 feet, depending on the equipment being used and the type of construction activity occurring. As such vibration levels may exceed the groundborne velocity threshold of 72 VdB at residences and or buildings where people sleep located adjacent to the project site. However, construction of the proposed project would occur between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday in accordance with SDMC Section 59.5.0404 and the use of equipment that would result in

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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groundborne vibrations would be intermittent during construction. In addition, 100 VdB is the threshold where minor damage can occur in fragile buildings. However, vibration levels during construction of the proposed project are not expected to exceed 87 VdB, which is below the threshold where damage may occur. Thus, structural damage associated with vibration is not expected to occur as a result construction activities for the proposed project. Therefore, a less than significant impact is identified for this issue area.

- c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Please see XII a) above. The proposed project is not anticipated to result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project. Therefore, a less than significant impact is identified for this issue area.

- d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

Please see XII a) above. As discussed above, construction of the proposed project has the potential to result in a significant temporary increase in noise levels at sensitive receptors surrounding the project site. However, construction of the proposed project would occur between the hours of 7:00 a.m. and 7:00 p.m. Monday through Friday in accordance with SDMC Section 59.5.0404. In addition, implementation of Mitigation Measures N-1 through N-3 identified above would reduce impacts to a less than significant level. Therefore, a less than significant impact is identified for this issue area with mitigation.

- 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 expose people residing or working in the project area to excessive noise levels?

The proposed project site is located less than 2 miles northeast of SDIA, within Review Area 2 of the SDIA AIA as designated in the ALUCP (San Diego County Regional Airport Authority, 2014). However, the project site is located outside of the 60 dB CNEL noise contour, which has been established in the SDIA ALUCP as the threshold above which noise compatibility standards apply. In addition, the proposed project is merely a continuation of an existing use, and would not increase the number of students or faculty present onsite which may be exposed to excessive noise levels. Therefore, impacts would be less than significant for this issue area.

- f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?

There are no private airstrips within the vicinity of the project site. Therefore, no impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XIII. POPULATION AND HOUSING. Would the project?

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project is the WSM of the existing school campus. The proposed project would serve the existing student population and would not increase enrollment capacity. The proposed project would serve an existing need and would not result in a need for new housing; generate new employment; or, result in the extension of roads or other infrastructure. Therefore, implementation of the proposed project would not induce substantial population growth in the area either directly or indirectly. No impact is identified for this issue area.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No housing exists within the Grant K-8 School campus. Therefore, no impact is identified for this issue area.

- c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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No people reside within the Grant K-8 School campus. As such, no people would be displaced. Therefore, no impact is identified for this issue area.

XIV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

- a) Fire protection?
 b) Police protection?
 c) Schools?
 d) Parks?
 e) Other public services?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The proposed project would not result in a change in the existing school's function and would not result in an increase need of public services. The proposed project is located in an urbanized area with sufficient public services to serve the proposed project. As such, the proposed project would not have an adverse physical effect on the environment because the project does not require new or significantly altered services or facilities to be constructed. Therefore, no impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XV. 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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project would serve the existing student population and would not increase enrollment capacity. In addition, the proposed project would not increase population, generating a demand for recreational uses. The project site is not located in an area planned for recreational uses. Therefore, no impact is identified for this issue area.

- 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?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project is the WSM of the existing school campus and would not require the provision of new recreational facilities. Additionally, the proposed project would not increase population, generating a demand for recreational uses. Therefore, no impact is identified for this issue area.

XVI. TRANSPORTATION/TRAFFIC. Would the project

- a) Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeway, pedestrian and bicycle paths, and mass transit?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project would occur entirely within the premises of the existing school campus within an urbanized area. The proposed project would serve the existing student population and would not result in an increase in enrollment capacity that would generate an increase in average daily trips to and from the school. As such, the proposed project would not impact the performance of the circulation system. Therefore, no impact is identified for this issue area.

- b) Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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See XVI a) above. Therefore, no impact is identified for this issue area.

- c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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The proposed project does not include air transportation, and would not result in a change in air traffic patterns, air traffic levels, or a change in location. Therefore, no impact is identified for this issue area.

- d) Substantially increase hazards due to design features (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The existing surrounding circulation network would not change with the implementation of the proposed project. Students, parents, and faculty would continue to use the existing school access located along Washington Place. Currently, student pick-up and drop-off occurs on Washington Place. The proposed project would not increase enrollment capacity or the number of faculty onsite, and thus would not increase traffic congestion or potential safety hazards during typical student pick-up and drop-off times. Therefore, no impact is identified for this issue area.

- e) Result in inadequate emergency access?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project would not significantly alter the existing emergency access to the site. The project would be designed to maintain adequate emergency access pursuant to the California Code of Regulations and Education Code. Therefore, no impact is identified for this issue area.

- f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities?

<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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The proposed project would not conflict with any adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. Therefore, no impact is identified for this issue area.

XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:

- a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project is the WSM of the existing school campus located in an urbanized area and would not increase enrollment capacity or the number of faculty onsite. As such, the proposed project is not anticipated to generate increased amounts of wastewater and would not exceed wastewater treatment facility capacity. Therefore, a less than significant impact is identified for this issue area.

- b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The project site is an existing school campus with adequate water and wastewater facilities. The proposed project is the WSM of the existing school campus and would not increase enrollment capacity or the number of faculty onsite. The proposed project is not anticipated to result in an increase in the need for more water and/or wastewater, and would continue to be accommodated by the existing facilities. It would not require an expansion of existing, or construction of new, water or wastewater treatment facilities. Therefore, a less than significant impact is identified for this issue area.

	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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c) Require or result in construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project is the WSM of the existing school campus located in an urbanized area. The proposed project would not develop any undeveloped areas and thus would not increase the amount of impermeable surfaces on-site. Any runoff from the site would continue to be accommodated by the City of San Diego's storm water drainage facilities. Therefore, a less than significant impact is identified for this issue area.

d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project is the WSM of the existing school campus located in an urbanized area. The proposed project would not increase enrollment capacity or the number of faculty onsite. As such, the proposed project is not anticipated to result in an increase in the need for additional water. The City of San Diego supplies water to the existing school and would continue to supply a sufficient amount of water. Therefore, a less than significant impact is identified for this issue area.

e) 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?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project is the WSM of the existing school campus, which is located in an urbanized area with adequate wastewater facilities. The proposed project would not increase enrollment capacity or the number of faculty onsite. The proposed project is not anticipated to result in an increase in the existing wastewater demands and would not exceed capacity for the project site. Therefore, a less than significant impact is identified for this issue area.

f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal need?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project is the WSM of the existing school campus currently served by a landfill for solid waste disposal needs. During construction, non-recyclable solid waste would be taken to a permitted landfill with sufficient capacity to accommodate the project's disposal needs. Operation of the proposed project would not result in an increase in solid waste generation since the project would not increase enrollment capacity or the number of faculty onsite. Therefore, a less than significant impact is identified for this issue area.

g) Comply with federal, state and local statutes and regulations related to solid waste?

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project would continue to generate municipal solid waste acceptable for solid waste haulers and landfill operators at its current rate. The school would continue to comply with federal, state and local regulations related to solid waste and recycling. Therefore, a less than significant impact is identified for this issue area.

Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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XVIII. MANDATORY FINDINGS OF SIGNIFICANCE.

- a) Does the project 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, 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?

<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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The project site is located within an existing school campus within an urbanized area. As discussed above, the project site and surrounding area do not support sensitive biological resources. In addition, it was determined that no cultural or historical resources are present onsite that may be impacted by the proposed project. However, the project site is underlain by the Lindavista Formation, which has a moderate paleontological resource sensitivity. As such, excavation and grading during construction of the proposed project has the potential to uncover previously undiscovered paleontological resources. However, implementation of Mitigation Measure CR-1 would reduce impacts to a less than significant level. Therefore, a less than significant impact is identified for this issue area.

- 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.)

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project is the WSM of the existing school campus. The proposed project would not increase enrollment capacity or the number of faculty onsite. In addition, based on the analysis provided in this Initial Study, the proposed project would not result in any impacts that are individually limited, but cumulatively considerable. All of the potential impacts identified in this Initial Study are able to be mitigated to below a level of significance. Therefore, a less than significant impact is identified for this issue area.

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

<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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The proposed project is the WSM of the existing school campus. Based on the analysis provided in this Initial Study, the proposed project would not result in any potential impacts to the health or well-being of human beings either directly or indirectly. All of the potential impacts identified in this Initial Study are able to be mitigated to below a level of significance. Therefore, a less than significant impact is identified for this issue area.

References:

Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated. See the sample question below. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

- ASM Affiliates, Inc., 2015. Historical Resources Evaluation Report for Grant K-8 School San Diego, San Diego County, California, March 2015.
- ASM Affiliates, Inc., 2014. Cultural and Historical Resource Existing Conditions Report in Support of the Grant K-8 Whole Site Modernization Project, San Diego, California, July 22, 2014.
- California Department of Conservation, Division of Land Resource Protection, 2010. Farmland Mapping and Monitoring Program, 2010.
- California Department of Forestry and Fire Protection's Fire and Resource Assessment Program, 2007. Fire Hazard GIS layer, 2007.
- California Department of Toxic Substances Control, 2011. List of Toxic Substances Available on-line at <http://www.dtsc.ca.gov/databases/Calsites/CorteseList.cfm> visited on October 26, 2011.
- California Environmental Protection Agency, 2011. Cal/EPA "Cortese" List: Data Resources. Available online at <http://www.calepa.ca.gov/sitecleanup/corteselist> visited on October 26, 2011.
- California Geological Survey, 2010. Alquist-Priolo Earthquake Fault Zone Maps. Available online at http://www.quake.ca.gov/gmaps/ap/ap_maps.htm visited on October 31, 2011.
- California State Office of Historic Preservation, 2011. California Historical Resources Information System, available online at <http://www.ohp.parks.ca.gov> visited on October 11, 2011.
- City of San Diego, 2011. San Diego Municipal Code, Chapter 13 Zones (131.0406-.0415). October 2011.
- City of San Diego, 2008a. Progress Guide and General Plan, City of San Diego, March 2008, and Program Environmental Impact Report, certified March 10, 2008.
- City of San Diego, 2008b. Seismic Safety Study, Geologic Hazards and Faults, 2008.
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