

April 2016 | Mitigated Negative Declaration/Initial Study

SAN CLEMENTE HIGH SCHOOL CAMPUS IMPROVEMENTS

Capistrano Unified School District

Prepared for:

Capistrano Unified School District

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MITIGATED NEGATIVE DECLARATION

The Capistrano Unified School District (CUSD or District) has completed an Initial Study for the San Clemente High School Campus Improvements project. The Initial Study was completed in accordance with the California Environmental Quality Act (CEQA, California Public Resources Code §§ 21000 et seq.), and the State CEQA Guidelines (California Code of Regulations §§ 15000 et seq.).

The Initial Study concluded that the project would not have a significant effect on the environment with implementation of mitigation. Accordingly, this Mitigated Negative Declaration (MND) has been prepared for the proposed project.

LEAD AGENCY and PROJECT PROPONENT: Capistrano Unified School District

PROJECT TITLE: San Clement High School Campus Improvements

PROJECT LOCATION: The project site comprises the San Clemente High School campus at 700 Avenida Pico in the City of San Clemente, Orange County.

PROJECT DESCRIPTION: The proposed project involves a number of improvements in a portion of the lower campus of San Clemente High School, including the construction of a new two-story classroom building, circulation improvements, pedestrian walkways, and installation of new landscaping. Improvements within the lower campus would occur in an area that is currently developed with parking area and circulation improvements, as well as a basketball court. The remainder of the campus and the improvements within those areas would remain in their current condition and not undergo any changes under the proposed project.

EXISTING CONDITIONS: The project site encompasses the overall campus of San Clemente High School, which is a public school serving grade levels nine through twelve. The lower campus portion of the school where improvements would occur under the proposed project consists of parking area improvements (i.e., asphalt, concrete walkway and curb face, light polls, and minimal landscaping) and a basketball court.

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SUMMARY OF IMPACTS: The attached Initial Study was prepared to identify the potential effects on the environment from the construction and operation of the proposed project. Based on the environmental analysis contained in the Initial Study, the proposed project would have no impacts or less-than-significant environmental impacts associated with the following CEQA checklist environmental topics:

- Aesthetics
- Agriculture and Forestry Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soil
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation and Traffic
- Utilities and Service Systems

Based on the environmental analysis contained in the Initial Study, the proposed project would have significant environmental impacts associated with the following environmental topics: Air Quality (construction related) and Cultural Resources (archeological and paleontological resources). However, as substantiated in the Initial Study, the proposed project will not have a significant effect on the environment with the implementation of mitigation. After implementation of mitigation measures, no significant impacts would occur.

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- F. Traffic Counts and Intersection Calculation Worksheets

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Abbreviations and Acronyms

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

Abbreviations and Acronyms

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

Abbreviations and Acronyms

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

Abbreviations and Acronyms

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

Abbreviations and Acronyms

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1. Introduction

1.1 OVERVIEW

The Capistrano Unified School District (CUSD or District) prepared this Initial Study to evaluate the potential environmental consequences associated with the proposed San Clemente High School campus improvements, which include development of a new two-story classroom building, circulation improvements and other hardscape and landscape improvements in the lower campus of the school. As part of CUSD's approval process, the proposed project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). The Initial Study is a preliminary analysis prepared by the lead agency to determine whether an Environmental Impact Report or a Negative Declaration is required. If the Initial Study concludes that the project may have a significant effect on the environment, an Environmental Impact Report must be prepared. Otherwise, a Negative Declaration or Mitigated Negative Declaration is prepared. The information provided in this Initial Study supports the conclusion that a Mitigated Negative Declaration is the appropriate level of review for the proposed project.

1.2 ENVIRONMENTAL PROCESS

The completion of the environmental compliance process is governed by two principal regulations: California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] §§ 21000 et seq.) and the State CEQA Guidelines (California Code of Regulations [CCR] §§ 15000 et seq.). CEQA was enacted in 1970 by the California Legislature to disclose to decision makers and the public the significant environmental effects of proposed activities and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and state agencies, boards, commissions, and special districts (such as school districts and water districts). CUSD is the lead agency for the proposed project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed project.

PRC Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies...." In this case, CUSD would approve and carry out the proposed project and has, therefore, prepared this Initial Study to determine whether there is substantial evidence that implementation of the project would result in significant environmental impacts. An Initial Study is a preliminary environmental analysis to determine whether an environmental impact report (EIR), a mitigated negative declaration (MND), or a negative declaration (ND) is required for a project (CEQA Guidelines § 15063). An Initial Study is required to contain a project description; a description of the environmental setting; an identification of environmental effects by checklist or other similar form; an explanation of environmental effects; a discussion of mitigation for significant environmental effects; an evaluation of the project's consistency with existing, applicable land use controls; the names of persons who prepared the study; and identification of data sources.

1. Introduction

When an Initial Study identifies the potential for significant environmental impacts, the lead agency must prepare an EIR (CEQA Guidelines § 15064); however, if all impacts can be mitigated to a less-than-significant level, the lead agency can prepare an MND that incorporates mitigation measures into the project (CEQA Guidelines § 15070).

1.3 MITIGATED NEGATIVE DECLARATION AND SUPPORTING INITIAL STUDY

This Initial Study was prepared to determine if the proposed project would have a significant impact on the environment. The purposes of the Initial Study is to 1) provide the lead agency with information to use as the basis for deciding the proper type of CEQA document to prepare; 2) enable the lead agency to modify a project, mitigating adverse impacts before an EIR is prepared, thereby enabling the project to qualify for a negative declaration; 3) assist the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; 5) provide documentation of the factual basis for the findings in an ND or MND; 6) eliminate unnecessary EIRs; and 7) determine if the project is covered under a previously prepared EIR (CEQA Guidelines § 15063).

Based on the findings in this Initial Study, the District has determined that an MND is the appropriate level of environmental documentation for the proposed project. The mitigation measures in this Initial Study are designed to reduce or eliminate the potentially significant environmental impacts described herein. Mitigation measures are structured in accordance with the criteria in Section 15370 of the State CEQA Guidelines.

1.4 IMPACT TERMINOLOGY

The following terminology is used to describe the level of significance of impacts.

- A finding of ***no impact*** is appropriate if the analysis concludes that the project would not affect the particular topic area in any way.
- An impact is considered ***less than significant*** if the analysis concludes that it would cause no substantial adverse change to the environment and requires no mitigation.
- An impact is considered ***less than significant with mitigation incorporated*** if the analysis concludes that it would cause no substantial adverse change to the environment with the inclusion of environmental commitments or other enforceable mitigation measures.
- An impact is considered ***potentially significant*** if the analysis concludes that it could have a substantial adverse effect on the environment. If any impact is identified as potentially significant, an EIR would need to be prepared.

1. Introduction

1.5 ORGANIZATION OF THE INITIAL STUDY

The contents and format of this document are designed to meet the requirements of CEQA. The conclusions in this initial study are that the proposed project, as mitigated, would have no significant impacts. This document contains the following sections:

- **Section 1, Introduction**, identifies the purpose and scope of the MND and supporting Initial Study and the terminology used.
- **Section 2, Environmental Setting**, describes the existing conditions, surrounding land uses, general plan designations, and existing zoning of the project site and surrounding area.
- **Section 3, Project Description**, identifies the location, background, and describes the proposed project in detail.
- **Section 4, Environmental Checklist**, presents the CEQA checklist and the impact significance finding for each environmental topic.
- **Section 5, Environmental Analysis**, provides an evaluation of the environmental topics and a response to questions contained in the CEQA checklist and identifies mitigation measures, if required.
- **Section 6, References**, identifies all references and individuals cited in this Initial Study.
- **Section 7, List of Preparers**, identifies the individuals who prepared the MND and supporting Initial Study and technical studies and their areas of technical specialty.
- **Appendices**, present data supporting the analysis or contents of this Initial Study.
 - A. Air Quality and Greenhouse Gas Emission Background and Modeling Data
 - B. Phase I Cultural Resources Investigation
 - C. Geotechnical Investigation
 - D. Geologic and Environmental Hazards Assessment Report
 - E. Phase I Environmental Site Assessment
 - F. Traffic Counts and Intersection Calculation Worksheets

1. Introduction

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2. Environmental Setting

2.1 PROJECT LOCATION

The project site comprises the San Clemente High School campus at 700 Avenida Pico in the City of San Clemente (City), Orange County. The City is in the southernmost part of Orange County and is surrounded by the City of San Juan Capistrano and unincorporated Orange County to the north; the City of Dana Point and Pacific Ocean to the west; unincorporated San Diego County to the south; and unincorporated Orange County and San Diego County to the east. Figures 1, *Regional Location*, and 2, *Local Vicinity*, show the location of the project site within the regional and local contexts of Orange County and the City of San Clemente, respectively. Regional access to the project site is provided via Interstate 5 (I-5), with local access provided via Avenida Pico and Avenida Presidio (see Figure 2).

2.2 EXISTING CONDITIONS

Existing land uses on and surrounding the project site are shown in Figure 3, *Aerial Photograph*, while Figure 4, *Site Photographs*, depicts the existing conditions of the lower campus portion of the project site where building and circulation improvements would occur under the proposed project. As shown in Figure 3, the project site encompasses the overall campus of San Clemente High School, which is a public school serving grade levels nine through twelve. The campus comprises a number of one- and two-story buildings and structures and other site improvements associated with the high school. Campus-wide site improvements include parking areas and drive aisles; pedestrian paths and walkways; playfields and hardcourts; an outdoor swimming pool; and other hardscape and landscape improvements. As shown in Figure 4, the lower campus portion of the project site where improvements would occur consists of parking area improvements (i.e., asphalt, concrete walkway and curb face, light polls, and minimal landscaping) and a basketball court.

2.3 SURROUNDING LAND USE

The project site is surrounded by commercial uses and open space to the north; commercial uses and I-5 to the west; residential uses and I-5 to the south; and residential uses to the east (see Figure 3).

2.4 EXISTING ZONING AND GENERAL PLAN

Per the City of San Clemente General Plan (Centennial General Plan) land use map and zoning map, the project site is designated and zoned P (Public).

2. Environmental Setting

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Figure 1 - Regional Location
2. Environmental Setting



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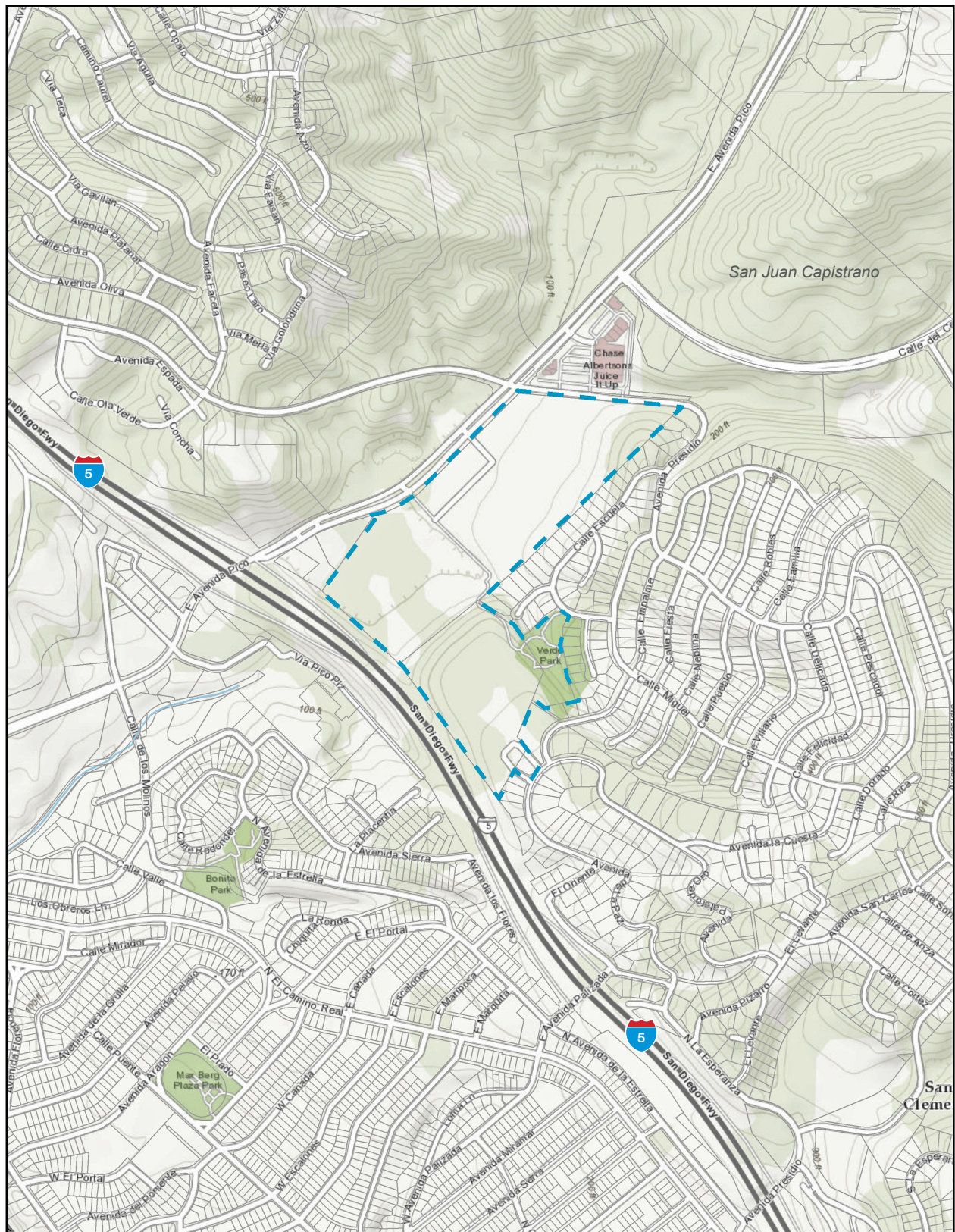
Source: ESRI, 2016

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2. Environmental Setting

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Figure 2 - Local Vicinity
2. Environmental Setting



— Project Site Boundary

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Scale (Feet)



Source: ESRI, 2016

PlaceWorks

2. Environmental Setting

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Figure 3 - Aerial Photograph
2. Environmental Setting



Project Site Boundary

Areas of Improvement

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Scale (Feet)



Source: Google Earth Pro, 2016

PlaceWorks

2. Environmental Setting

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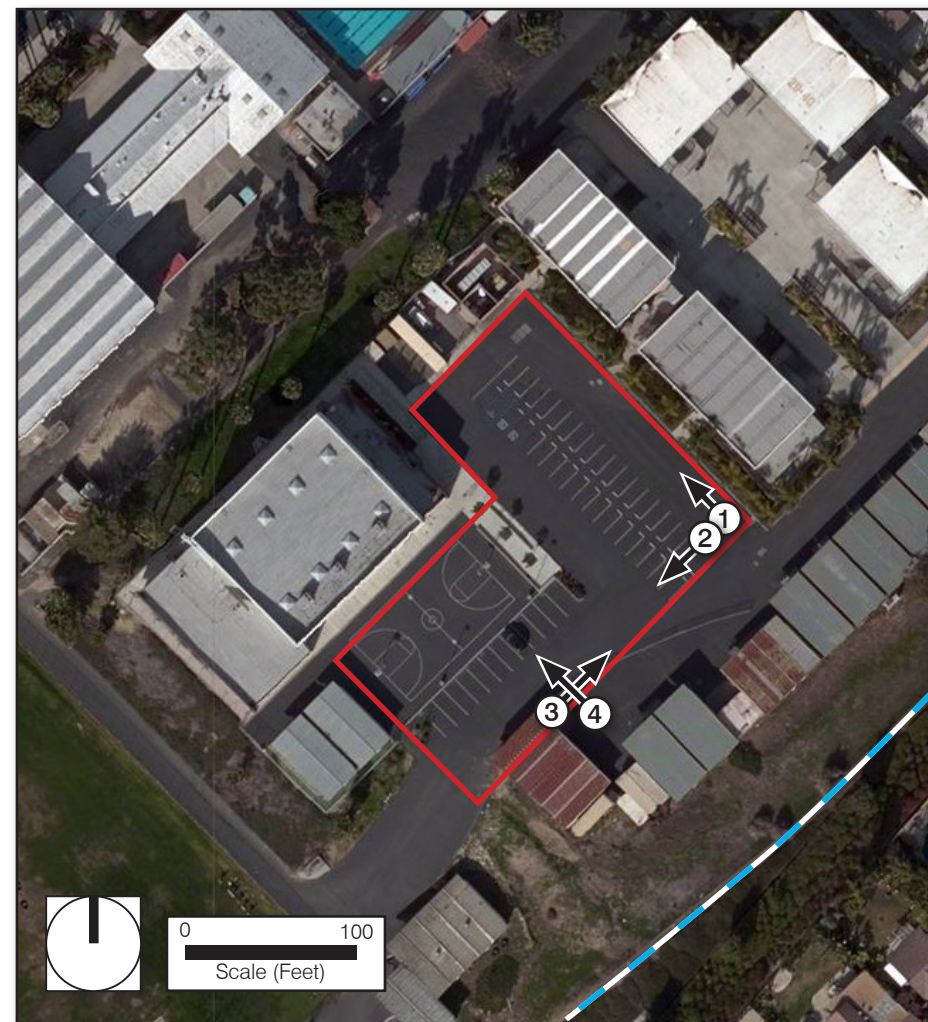
Figure 4 - Site Photographs
2. Environmental Setting



① View looking southwest across lower campus area of improvement.



② View looking northwest across lower campus area of improvement.



- Project Site Boundary
- Area of Improvement
- ① Photo Location and Direction

Key Map



③ View looking northeast across lower campus area of improvement.



④ View looking northwest across lower campus area of improvement.

2. Environmental Setting

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3. Project Description

3.1 PROPOSED PROJECT

The proposed project involves a number of improvements in a portion of the lower campus of San Clemente High School (see Figures 3, *Aerial Photograph*, and 5, *Lower Campus Site Plan*), including the construction of a new two-story classroom building, circulation improvements, pedestrian walkways, and installation of new landscaping. The proposed improvements would only occur in a portion of the lower campus, as discussed below and shown in Figures 3 and 5. Figures 5 also show the boundaries/limits of the area of improvement associated with the lower campus. The remainder of the campus and the improvements within those areas would remain in their current condition and not undergo any changes under the proposed project.

3.1.1 Site Plan and Character

Improvements within the lower campus include construction of a new two-story classroom building and associated hardscape and landscape improvements in an area of the campus that is currently developed with parking area and circulation improvements, as well as a basketball court; refer to Figures 3 and 6, *Lower Campus Area of Improvement Demolition Site Plan*, for the existing layout and design of the parking area and circulation improvements within the lower campus area of improvements. The proposed improvements are consistent with the existing institutional uses onsite and with the P (Public) land use and zoning designations of the project site, which permit institutional uses by right.

The new classroom building would allow the high school staff to shift students from classrooms in the upper campus, as well as help alleviate overcrowding in other classrooms on the campus. The District does not have any plans at this time to improve or demolish the existing classroom building in the upper campus. The classroom building would be vacated and remain in its existing condition and not undergo any changes under the proposed project.

Construction of the proposed classroom building and associated improvements require demolition of various hardscape improvements (e.g., asphalt paving, concrete curb faces) associated with the existing parking area, and removal of a few parking area trees and metal storage bins/units. Improvements within this area also require the removal or relocation of an existing portable building. Site features and improvements to be demolished and removed are shown in Figures 3, 4, and 6.

As shown in Figures 5 and 7, the new two-story classroom building (37 feet in height) would be placed southeast of the existing auxiliary gymnasium and would abut the realigned fire access lane. The proposed classroom building would total approximately 22,541 square feet and be of light-wood frame construction with localized steel framing. It would feature a total of 24 standard classrooms and support spaces, 2 men's restrooms, 2 women's restrooms, and 4 staff restrooms; the number of classrooms and restrooms would be

3. Project Description

evenly split between the two floors. The building would also include an elevator with an elevator lobby area on each floor, as well as exterior stairs.

Figures 8, *Classroom Building Perspective*, and 9, *Classroom Building Elevations and Perspectives*, provide perspectives of the proposed classroom building and illustrate the conceptual building elevations and the proposed architectural style and elements of the building. As shown in these figures, the architectural style of the building is contemporary; building materials would consist of cement plaster walls, painted steel (columns & stairs), and aluminum storefront window/wall systems with high performance insulated glazing units.

The school's student and staff population is discussed below under Section 3.1.4, *Student and Staff Numbers*.

3.1.2 Parking

The proposed project would involve the removal of 37 parking spaces within the lower campus area of improvement; the spaces to be removed would not be replaced elsewhere on the campus. However, adequate parking is provided on the campus to accommodate addition of the proposed classroom building.

3.1.3 Landscaping

Planting Design

Under the proposed project, new landscaping would only be introduced within the limits/boundaries of the lower campus area of improvements. The proposed planting design would be characterized by utilizing a low water-use, low maintenance plant palette to tie into the existing campus. Plant species would include a combination of native and California adaptive species. Focal trees would be used to accent building entries. The overall landscape design would comply with local regulations and tie into the overall character of the campus.

Irrigation Design

The proposed irrigation design would utilize high efficiency irrigation technology, including low flow heads and a smart irrigation controller. The irrigation system would be designed with a master valve and flow sensor to automatically shut off irrigation in case of breakage. Weather-station capability would ensure the controller would water in the most efficient manner.

3.1.4 Student and Staff Numbers

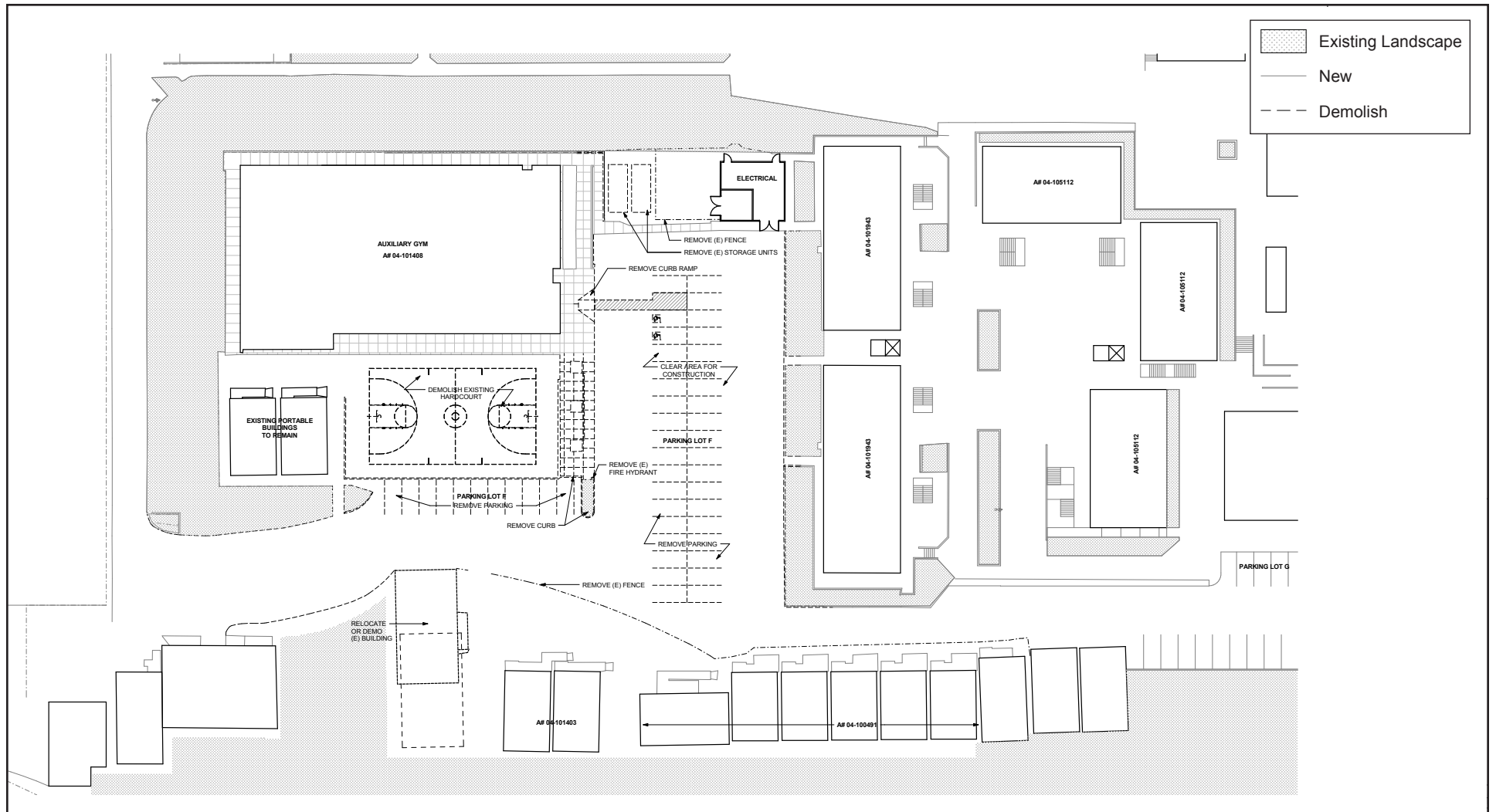
As noted above, the new classroom building would allow the high school staff to shift students from classrooms in the upper campus, as well as help alleviate overcrowding in other classrooms on the campus. The current student and staff population of the campus would remain as is upon completion of the proposed classroom building; no increases in the student or staff population would occur under the proposed project.



3. Project Description

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Figure 6 - Lower Campus Area of Improvement Demolition Site Plan
3. Project Description



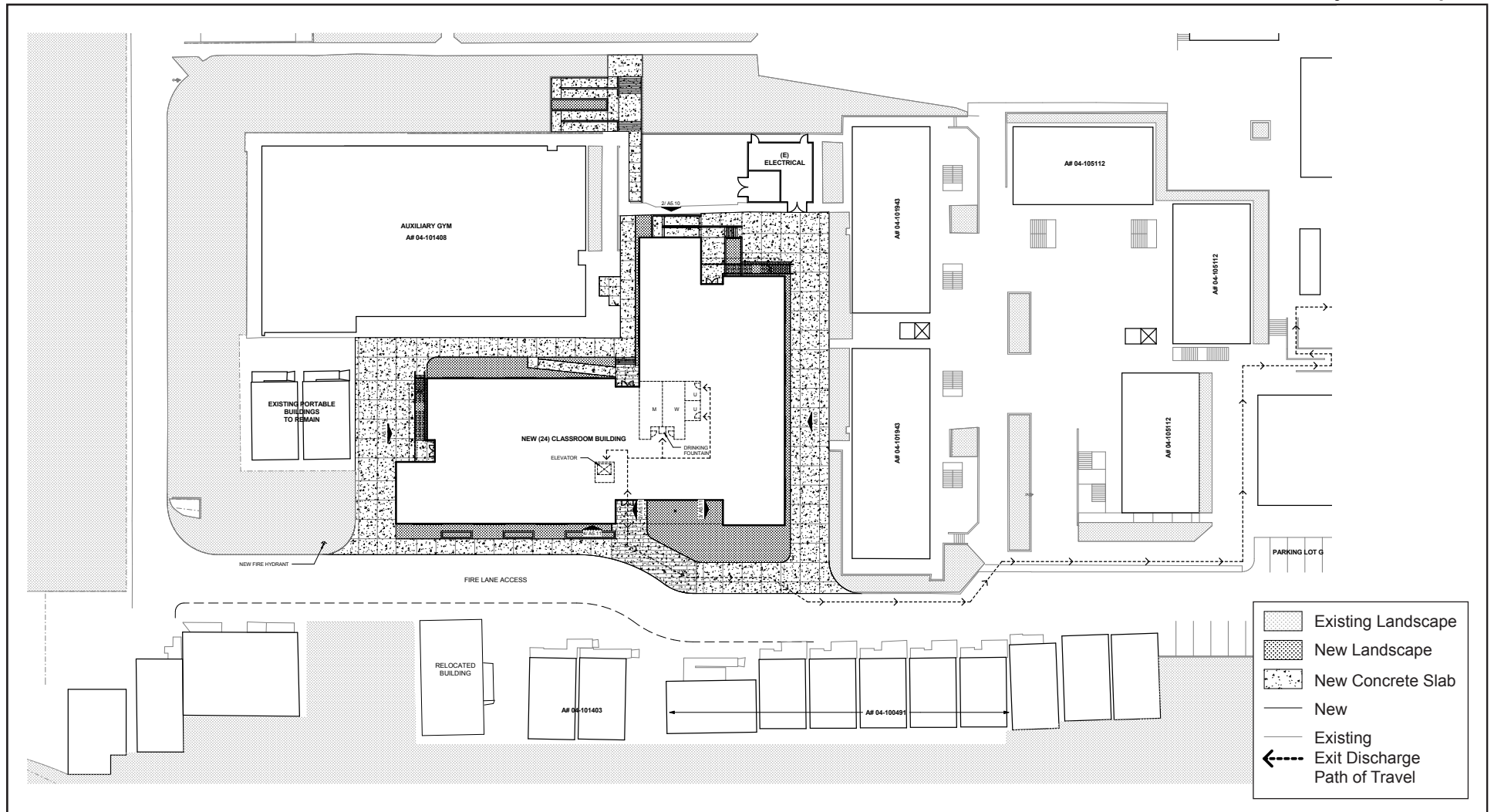
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3. Project Description

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Figure 7 - Lower Campus Area of Improvement Site Plan
3. Project Description



3. Project Description

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Figure 8 - Classroom Building Perspective
3. Project Description



3. Project Description

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Figure 9 - Classroom Building Elevations and Perspectives
3. Project Description



3. Project Description

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3. Project Description

3.1.5 Wet Utility Infrastructure

Potable Water and Sewer

As a part of the proposed project and to serve the needs of the new classroom building, a series of new potable water and sewer lines would connect to the existing water lines within the campus, which connect to the water and sewer mains along Avenida Pico and Avenida Presidio. The potable water system would be separate from the fire water system for supply to the new classroom building. The potable water system would be designed to meet the requirements of the 2013 California Plumbing Code; improvements would include new water pipes, water shut-off valves, valve boxes, and backflow preventers.

The fire water system would be designed to comply with NFPA (National Fire Protection Association) 24, “Standard for the Installation of Private Fire Service Mains and Their Appurtenances” 2013 Edition and with the Orange County Fire Authority Guideline B-10 for Fire Master Plans for public schools; improvements would include new water pipes, gate valves, back flow preventers, fire sprinklers, and fire hydrants.

The sanitary sewer system would be designed to meet the requirements of the 2013 California Plumbing Code; improvements would include new sewer pipes and yard boxes.

Proposed potable water and sewer infrastructure improvements would include trenching and exposing existing lines onsite for connections, trenching and installing new lines, and break-in connections to existing main lines. No offsite water or sewer line construction or upsizing would be required for the potable water and sewer systems to accommodate the proposed project.

Drainage

As a part of the proposed project a series of new drainage improvements would be implemented to serve the drainage needs of the new classroom building. The drainage system would be designed to meet the requirements of the 2013 California Plumbing Code; improvements would include new storm drain pipes and catch basins.

3.1.6 Sustainability

CUSD’s goal for the proposed project is to minimize the use of natural resources and incorporate sustainable design to the extent possible. In addition to the required 2013 Building and Energy Efficiency Standards and 2013 California Green Building Standards Code (CALGreen), the proposed classroom building would be designed in accordance with SDG&E’s (San Diego Gas & Electric) Savings By Design program, which is an optional program offered by SDG&E. The program encourages high-performance and energy-efficient, non-residential building design and construction. The program allows developers/participants to save money by reducing operating costs; increase comfort, health, and productivity for building occupants; and conserve natural resources.

3. Project Description

High performance design strategies/elements that have been integrated into the proposed classroom building include: dual insulated low-E glazing; efficient cool roof (high reflectance/low heat absorption); use of drought tolerant and native species of plants and trees; high efficiency irrigation technology; low water use plumbing fixtures; and LED energy efficient lighting for the interior and exterior of the proposed classroom building.

3.1.7 Project Construction and Phasing

Upon approval of the proposed project by the CUSD Board of Trustees, the proposed improvements would be completed in one phase, which includes demolition of the existing parking area improvements and construction of a new two-story classroom building and associated hardscape and landscape improvements in the lower campus area of improvements. Overall project construction is estimated to take approximately 10 months, beginning in August 2016. The school would remain in operation through the duration of the construction phase. The types of heavy construction equipment necessary to complete the proposed project would include but not be limited to bulldozers, grading tractors, and dump trucks. No soil import or export would be required, as the areas of improvement would balance.

3.2 LEAD AGENCY

CUSD is the lead agency under CEQA and has approval authority over the proposed project. This IS/MND must be adopted by the CUSD Board of Trustees (Board), confirming its adequacy in complying with the requirements of CEQA. The Board will consider the information in the IS/MND while deciding to approve or deny the proposed project. The analysis contained in this IS/MND is intended to provide environmental review for the whole of the proposed project, including planning, construction, and operation.

4. Environmental Checklist

4.1 BACKGROUND

1. Project Title: San Clemente High School Campus Improvements

2. Lead Agency Name and Address:

Capistrano Unified School District
33122 Valle Road
San Juan Capistrano, California 92675

3. Contact Person and Phone Number:

John Forney, Executive Director, Facilities, Maintenance & Operations
949.234.9543

4. Project Location:

The project site consists of the San Clemente High School campus at 700 Avenida Pico in the City of San Clemente, Orange County.

5. Project Sponsor's Name and Address:

Capistrano Unified School District
33122 Valle Road
San Juan Capistrano, California 92675

6. General Plan Designation: Public

7. Zoning: P (Public)

8. Description of Project:

The proposed project involves a number of improvements to the existing campus of San Clemente Hill High School; proposed improvements include a new two-story classroom building, circulation improvements, pedestrian walkways, and other hardscape and landscape improvements in a portion of the lower campus of the school. A more detailed description of the proposed project is provided in Section 3, *Project Description*.

9. Surrounding Land Uses and Setting:

The project site is surrounded by commercial uses and open space to the north; commercial uses and I-5 to the west; residential uses and I-5 to the south; and residential uses to the east.

10. Other Public Agencies Whose Approval Is Required: None

4. Environmental Checklist

4.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

4.3 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

Date

Printed Name

For

4. Environmental Checklist

4.4 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 may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an 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.
- 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. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a) Earlier Analyses Used. Identify and state where they are available for review.
 - b) Impacts Adequately Addressed. Identify which effects 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. A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
- 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 are free to use different formats; however, lead agencies should normally address the questions from this checklist 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.

4. Environmental Checklist

4.5 ENVIRONMENTAL CHECKLIST

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Would the project:				
a) Have a substantial adverse effect on a scenic vista?				X
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) Substantially degrade the existing visual character or quality of the site and its surroundings?				X
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X
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?				X
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?			X	
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X	
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)?			X	

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d) Expose sensitive receptors to substantial pollutant concentrations?		X		
e) Create objectionable odors affecting a substantial number of people?			X	
f) Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School? [PRC § 21151.8 (a)(1)(D)]				X
g) Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste? [PRC § 21151.8 (a)(2)]				X
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, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				X
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?				X
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?				X
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in § 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?		X		
d) Disturb any human remains, including those interred outside of formal cemeteries?			X	
e) Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?			X	
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 a known fault? Refer to Division of Mines and Geology Special Publication 42.				X
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
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?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
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?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				X

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			X	
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?			X	
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
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?			X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?				X
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?				X
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?				X
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?			X	
i) Does the proposed school site contain one or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood?				X
j) Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?				X
k) Is the project site a hazardous substance release site identified by the state Department of Health Services in a current list adopted pursuant to §25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code?			X	

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements?			X	
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)?			X	
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 a substantial erosion or siltation on- or off-site			X	
d) Substantially alter the existing drainage pattern of the site or area, including through the 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?			X	
e) Create or contribute runoff water which would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?			X	
f) Otherwise substantially degrade water quality?			X	
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?				X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?				X
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?				X
j) Inundation by seiche, tsunami, or mudflow?				X
X. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
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?				X
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?				X
XI. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				X
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?				X

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. NOISE. Would the project result in:				
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X	
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?			X	
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?				X
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?				X
XIII. POPULATION AND HOUSING. Would the project:				
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X
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?			X	
b) Police protection?			X	
c) Schools?				X
d) Parks?				X
e) Other public facilities?				X
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?				X
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?				X

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. TRANSPORTATION AND 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 freeways, pedestrian and bicycle paths, and mass transit?			X	
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?			X	
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?				X
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X	
e) Result in inadequate emergency access?				X
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?				X
XVII. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Exceed waste water treatment requirements of the applicable Regional Water Quality Control Board?			X	
b) Require or result in the construction of new water or waste water treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X	
d) Have sufficient water supplies available to serve the project from existing entitlements and resources or are new or expanded entitlements needed?			X	
e) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			X	
g) Comply with federal, state, and local statutes and regulations related to solid waste?				X

4. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			X	
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.)			X	
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X		

4. Environmental Checklist

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5. Environmental Analysis

Section 4.6 provided a checklist of environmental impacts. This section provides an evaluation of the environmental topics in the checklist and identifies mitigation measures, if required.

5.1 AESTHETICS

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

No Impact. Open space hillside areas within the City are visible to the north and northwest of the project site; the surrounding hills are visible from the residential neighborhoods southeast of the project site and from I-5. The nearest residential use to the project site is approximately 210 feet southeast of the proposed two-story classroom building. Because of the distance to the existing residences, the proposed classroom building would not block private views of the surrounding hills; additionally, the project site sits at a much lower elevation than the residences to the southeast. The proposed classroom building would also not block any public views to passerby along I-5, as the project site sits at a much lower elevation than the travel lanes of I-5. Therefore, no impact on scenic vistas would occur and no mitigation measures are necessary.

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

No Impact. According to the California Scenic Highway Mapping System of the California Department of Transportation, the project site is not on or near a state-designated scenic highway (Caltrans 2011). The nearest designated state scenic highway to the site is State Route 91 (SR-91), approximately 30 miles to the north. Therefore, no impact on scenic resources along a state-designated scenic highway would occur and no mitigation measures are necessary.

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

No Impact. Development of the two-story classroom building and pedestrian and circulation improvements under the proposed project would not result in the degradation of the existing visual character or quality of the site and its surroundings. Figures 8, *Classroom Building Perspective*, and 9, *Classroom Building Elevations and Perspectives*, provide perspectives of the proposed classroom building and illustrate the conceptual building elevations and the proposed architectural style and elements of the building. As shown in Figures 9 and 10, the architectural style of the building is contemporary; the design of the proposed classroom building would be compatible with and complementary to the design of the other buildings on campus. The height and scale of the proposed classroom building would also be comparable with other buildings onsite. Considering the scale and palette of the existing campus context, the classroom building would be designed to fit seamlessly within the context of the existing campus. Therefore, no impact would occur and no mitigation measures are necessary.

5. Environmental Analysis

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

Less Than Significant Impact. As shown in Figure 3, *Aerial Photograph*, the project site is developed with the campus of San Clemente High School, which consists of a number of buildings and structures, parking areas and drive aisles, and other site improvements associated with the school. Sources of nighttime light and glare exist within the confines of the project site, which are associated with lighting for the existing buildings (exterior and interior), pedestrian walkways, and parking areas. Additionally, other sources of light and glare exist in the project area; these sources include lights associated with the surrounding streets and commercial and residential uses.

The proposed project would introduce exterior lighting for the new classroom building, as well as for the new pedestrian walkways surrounding the classroom building. These new sources of lighting have the potential to increase nighttime light and glare in the project area. However, the new light sources that would be introduced under the proposed project would be similar to those that currently occur throughout the campus. Additionally, as with the existing light sources on the campus, the lights associated with the proposed project would be directed toward the interior of the site so as not to create impacts to motorists on the surrounding streets or residential uses. All exterior lighting would be designed, arranged, installed, directed, shielded, and maintained in such a manner as to contain direct illumination onsite, thereby preventing excess illumination and light spillover onto adjoining land uses and/or roadways. Lighting would be installed to accommodate safety and security on the campus while minimizing impacts on surrounding land uses.

Therefore, project development would not result in the addition of a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts would be less than significant and no mitigation measures are necessary.

5.2 AGRICULTURE AND FORESTRY RESOURCES

Would the project:

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

No Impact. The proposed project involves a number of site and building improvements to an existing high school in an urbanized area of the City. As shown in Figure 3, *Aerial Photograph*, the project site consists of a number of buildings and structures, parking areas and drive aisles, and other site improvements associated with the school. According to California Resource Agency's Department of Conservation online "California Important Farmland Finder", the project site is not designated as Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance (CRADC 2016); the project is designated as Urban and Built-Up Land. Additionally, the project site and surrounding area are not currently used for agricultural purposes. Development of the proposed project would not convert farmland to nonagricultural use. Therefore, no impact to farmland would occur and no mitigation measures are necessary.

5. Environmental Analysis

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

No Impact. Per the City's zoning map, the project site is zoned P (Public). The site is not zoned for agricultural use, and project development would not conflict with such zoning. Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. The project site is developed with the campus of San Clemente High School, and there is no Williamson Act contract in effect onsite. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. The project site is not designated or zoned for forest or timber land or used for forestry. As stated above, the project site is zoned P (Public) and is developed with the campus of San Clemente High School. Additionally, the trees onsite to be removed are ornamental trees and are not cultivated for forest resources. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. See response to Section 5.2(c), above.

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

No Impact. See responses to Sections 5.2(a), (b), and (c), above.

5.3 AIR QUALITY

This section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthful pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the project site, and air quality modeling can be found in Appendix A.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast Air Quality Management District (SCAQMD), is designated nonattainment for O₃, and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2014a).

5. Environmental Analysis

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

Would the project:

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

Less Than Significant Impact. A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the air quality management plan (AQMP). It fulfills the CEQA goal of informing decision makers of the environmental efforts of the project under consideration at an early enough stage to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to clean air goals in the AQMP. The most recently adopted comprehensive plan is the 2012 AQMP, adopted on December 7, 2012 (see Appendix A to this Initial Study for a description of the 2012 AQMP).

Regional growth projections are used by SCAQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. The proposed project is not considered a regionally significant project that would warrant Intergovernmental Review by SCAG under CEQA Guidelines section 15206.

The proposed project involves construction of a new two-story classroom building and would not result in an increase in enrollment at the existing high school. The land use is consistent with City of San Clemente's underlying General Plan land use designation, and the site currently operates as a high school. Therefore, it would not have the potential to substantially affect the regional growth projections. Additionally, the regional emissions generated by construction and operation of the proposed project would be less than the SCAQMD emissions thresholds, and SCAQMD would not consider the project a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. Therefore, the proposed project would not affect the regional emissions inventory or conflict with strategies in the AQMP. Impacts are less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. The following describes project-related impacts from short-term construction activities and long-term operation of the proposed project.

Short-Term Air Quality Impacts

Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust emissions from off-road diesel-powered construction equipment; 2) dust generated by grading, earthmoving, and other construction activities; 3) exhaust emissions from on-road vehicles and 4) off-gas emissions of volatile organic compounds (VOCs) from application of asphalt, paints, and coatings.

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Construction activities would occur on approximately 1 acre of the 47-acre project site. Construction would involve asphalt demolition; site preparation; site grading; utility trenching; construction of the new classroom building; asphalt paving; architectural coating; and portable building hauls. Construction activities would start in the summer of 2016 and would take approximately 9 months. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2013.2.2, based on the project's preliminary construction schedule, phasing, and equipment list provided by the District. The construction schedule and equipment mix is based on preliminary engineering and is subject to changes during final design and as dictated by field conditions. Results of the construction emission modeling are shown in Table 1. As shown in the table, air pollutant emissions from construction-related activities would be less than their respective SCAQMD regional significance threshold values. Therefore, air quality impacts from project-related construction activities would be less than significant and no mitigation measures are necessary.

Table 1 Maximum Daily Regional Construction Emissions

Source	Criteria Air Pollutants (lbs/day) ^{1,2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
2016 Asphalt Demolition + Site Preparation	3	26	21	<1	2	2
2016 Asphalt Demolition + Site Preparation + Rough Grading + Utility Trenching	4	37	30	<1	3	3
2016 Asphalt Demolition + Site Preparation + Rough Grading + Utility Trenching + Asphalt Demo Debris Haul + Fine Grading	5	45	37	<1	4	3
2016 Utility Trenching + Fine Grading	1	11	9	<1	1	1
2016 Building Construction	2	21	14	<1	2	1
2017 Building Construction	2	19	14	<1	1	1
2017 Building Construction + Asphalt Paving + Architectural Coating	21	28	21	<1	2	2
2017 Building Construction + Portable Building Haul + Finishing/Landscaping	3	23	18	<1	2	1
2017 Finishing/Landscaping	<1	3	3	<1	<1	<1
Maximum Daily Emissions	21	45	37	<1	4	3
SCAQMD Regional Threshold	75	100	550	150	150	55
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2013.2.2.

Notes: Totals may not equal 100 percent due to rounding.

¹ The construction schedule is based on the preliminary information provided by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD of construction equipment and phasing for comparable projects.

² Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.

Long-Term Operation-Related Air Quality Impact

Long-term air pollutant emissions generated by the proposed project would be generated by area sources (e.g., landscape fuel use, aerosols, and architectural coatings) and energy use (natural gas) associated with the proposed new classroom building. Since the proposed project would not increase in enrollment at the existing high school, it would not generate new trips. Criteria air pollutant emissions for the proposed project were

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modeled using CalEEMod. Table 2 identifies criteria air pollutant emissions from the proposed project. As shown in the table, project-related air pollutant emissions would not exceed the SCAQMD's regional emissions thresholds for operational activities. Overall, long-term operation-related impacts to air quality would be less than significant and no mitigation measures are necessary.

Table 2 Maximum Daily Regional Operational Phase Emissions

Source	Criteria Air Pollutants (lbs/day)					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Area	1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Total Emissions	1	<1	<1	<1	<1	<1
SCAQMD Regional Threshold	55	55	550	150	150	55
Exceeds Regional Threshold?	No	No	No	No	No	No

Source: CalEEMod Version 2013.2.2.
Notes: Highest winter or summer emissions are reported. Totals may not total to 100 percent due to rounding.

- c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?**

Less Than Significant Impact. The SoCAB is designated as nonattainment for O₃ and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead under the National AAQS (CARB 2014a). According to SCAQMD methodology, any project that does not exceed or can be mitigated to less than the daily threshold values would not add significantly to a cumulative impact (SCAQMD 1993). As demonstrated above, project-related construction and operational activities would not result in emissions in excess of SCAQMD's significant thresholds. Therefore, the proposed project would not result in a cumulatively considerable net increase in criteria pollutants. Impacts would be less than significant and no mitigation measures are necessary.

- d) Expose sensitive receptors to substantial pollutant concentrations?**

Less Than Significant Impact With Mitigation Incorporated. The proposed project could expose sensitive receptors to elevated pollutant concentrations if it would cause or contribute significantly to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

Construction LSTs

Localized significance thresholds (LSTs) are based on the California AAQS, which are the most stringent AAQS that have been established to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. Construction LSTs are based on the size of the project site, distance

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to the nearest sensitive receptor, and Source Receptor Area. Receptors proximate to the project site are the residences to the south and east.

Air pollutant emissions generated by construction activities are anticipated to cause temporary increases in air pollutant concentrations. Table 3 shows the maximum daily construction emissions (pounds per day) generated during onsite construction activities compared with the SCAQMD's LSTs.

Table 3 Localized Construction Emissions

Source	Pollutants(lbs/day) ^{1,2}			
	NO _x	CO	PM ₁₀	PM _{2.5}
2016 Asphalt Demolition + Site Preparation	25	18	1.90	1.79
2016 Asphalt Demolition + Site Preparation + Rough Grading + Utility Trenching	34	25	2.66	2.48
2016 Asphalt Demolition + Site Preparation + Rough Grading + Utility Trenching + Asphalt Demo Debris Haul + Fine Grading	41	30	3.57	3.0023
2016 Utility Trenching + Fine Grading	10	7	0.75	0.69
2016 Building Construction	20	12	1.24	1.17
2017 Building Construction	18	11	1.12	1.05
2017 Building Construction + Asphalt Paving + Architectural Coating	27	18	1.75	1.65
2017 Building Construction + Portable Building Haul + Finishing/Landscaping	21	14	1.26	1.18
2017 Finishing/Landscaping	3	3	0.14	0.13
SCAQMD ≤1.00-acre LST	91	696	4.00	3.00
Exceeds LST?	No	No	No	Yes

Source: CalEEMod Version 2013.2.2., and SCAQMD 2008 & 2011.

Notes: **Bold** = Exceed Threshold. In accordance with SCAQMD methodology, only onsite stationary sources and mobile equipment occurring on the proposed project site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the proposed project site in Source Receptor Area (SRA) 21.

¹ The construction schedule is based on the preliminary information provided by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD of construction equipment and phasing for comparable projects.

² Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street sweeping with Rule 1186-compliant sweepers.

As shown in Table 3, the maximum daily NO_x, CO, and PM₁₀ construction emissions generated from onsite construction-related activities would be less than their respective SCAQMD LSTs. However, PM_{2.5} emissions generated during the overlapping asphalt demolition, site preparation, rough grading, utility trenching, asphalt demo debris haul, and fine grading phases would exceed the SCAQMD LSTs. Therefore, project-related construction activities would have the potential to expose sensitive receptors to substantial pollutant concentrations without implementation of mitigation.

Table 4 shows the emissions that would be generated with implementation of Mitigation Measure AQ-1, which requires watering disturbed areas at least three times per day. As shown in the table, emissions of PM_{2.5} would be reduced to below the SCAQMD LSTs for the overlapping asphalt demolition, site preparation,

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rough grading, utility trenching, asphalt demo debris haul, and fine grading phases. Therefore, with incorporation of mitigation, construction LST impacts would be less than significant.

Table 4 Localized Construction Emissions – Mitigated

Source	Pollutants(lbs/day) ^{1,2}			
	NO _x	CO	PM ₁₀	PM _{2.5}
2016 Asphalt Demolition + Site Preparation	25	18	1.90	1.79
2016 Asphalt Demolition + Site Preparation + Rough Grading + Utility Trenching	34	25	2.65	2.47
2016 Asphalt Demolition + Site Preparation + Rough Grading + Utility Trenching + Asphalt Demo Debris Haul + Fine Grading	41	30	3.51	2.99
2016 Utility Trenching + Fine Grading	10	7	0.75	0.69
2016 Building Construction	20	12	1.24	1.17
2017 Building Construction	18	11	1.12	1.05
2017 Building Construction + Asphalt Paving + Architectural Coating	27	18	1.75	1.65
2017 Building Construction + Portable Building Haul + Finishing/Landscaping	21	14	1.26	1.18
2017 Finishing/Landscaping	3	3	0.14	0.13
SCAQMD ≤1.00-acre LST	91	696	4.00	3.00
Exceeds LST?	No	No	No	No

Source: CalEEMod Version 2013.2.2., and SCAQMD 2008 & 2011.

Notes: In accordance with SCAQMD methodology, only onsite stationary sources and mobile equipment occurring on the proposed project site are included in the analysis. LSTs are based on receptors within 82 feet (25 meters) of the proposed project site in Source Receptor Area (SRA) 21.

¹ The construction schedule is based on the preliminary information provided by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD of construction equipment and phasing for comparable projects.

² Includes implementation of fugitive dust control measures required by SCAQMD under Rule 403, including watering disturbed areas a minimum of three times per day (per Mitigation Measure AQ-1), reducing speed limit to 15 miles per hour on unpaved surfaces, and street sweeping with Rule 1186-compliant sweepers.

Mitigation Measure

AQ-1

Prior to issuance of any construction permits, the construction contractor(s) shall prepare a dust control plan (Plan) and implement the following measures during construction activities in addition to the existing requirements for fugitive dust control under South Coast Air Quality Management District Rule 403 to further reduce PM₁₀ and PM_{2.5} emissions. The Plan shall be submitted to and verified by the District's Executive Director, Facilities, Maintenance and Operation. The Executive Director or designee shall verify compliance that these measures have been implemented during normal construction site inspections.

- During construction, the construction contractor shall sweep streets with Rule 1186-compliant, PM₁₀-efficient vacuum units on a daily basis if silt is carried over to adjacent public thoroughfares or occurs as a result of hauling.

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- During construction, the construction contractor shall water exposed ground surfaces and disturbed areas a minimum of every three hours on the construction site and a minimum of three times per day.
- During construction, the construction contractor shall limit onsite vehicle speeds on unpaved roads to no more than 15 miles per hour.

Operation LSTs

Operation of the proposed project would not result in the generation of substantial quantities of emission from onsite, stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions that would require a permit from SCAQMD include industrial land uses, such as chemical processing and warehousing operations where substantial truck idling could occur onsite. The proposed project does not fall within these categories of uses. While operation of the proposed project would result in the use of standard onsite mechanical equipment such as heating, ventilation, and air conditioning units in addition to occasional use of landscaping equipment for project site maintenance, air pollutant emissions generated from these activities would be nominal (see Table 2, *Maximum Daily Regional Operational Phase Emissions*). Therefore, localized air quality impacts related to stationary-source emissions would be less than significant and no mitigation measures are necessary.

Carbon Monoxide Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 parts per million (ppm) or the eight-hour standard of 9.0 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds.

The SoCAB has been designated attainment under both the national and California AAQS for CO. Under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection by more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited—in order to generate a significant CO impact (BAAQMD 2011). Since student enrollment capacity would not increase, the proposed project would not generate new vehicle trips. Furthermore, the SoCAB has since been designated as attainment under both the national and California AAQS for CO. The proposed project would not have the potential to substantially increase CO hotspots at intersections in the vicinity of the project site. Therefore, localized air quality impacts related to mobile-source emissions would be less than significant and no mitigation measures are necessary.

Health Risk Assessment

SCAQMD currently does not require health risk assessments to be conducted for short-term emissions from construction equipment. Emissions from construction equipment primarily consist of diesel particulate matter (DPM). The Office of Environmental Health Hazards Assessment (OEHHA) has recently adopted new guidance for the preparation of health risk assessments issued in March 2015. OEHHA has developed a

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cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. The proposed project would be developed in approximately 9 months, which would limit the exposure to on- and offsite receptors. SCAQMD currently does not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. In addition, as demonstrated above, construction activities would not exceed LST significance thresholds. For the reasons stated above, it is anticipated that construction emissions would not pose a threat to onsite and offsite receptors at or near the school, and project-related construction health impacts would be less than significant. No mitigation measures are necessary.

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

Less Than Significant Impact. The proposed project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to SCAQMD Rule 402, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants; compost facilities; landfills; solid waste transfer stations; fiberglass manufacturing facilities; paint/coating operations (e.g., auto body shops); dairy farms; petroleum refineries; asphalt batch plants; chemical manufacturing; and food manufacturing facilities. The uses proposed by the project do not fall within the aforementioned land uses. Emissions from construction equipment, such as diesel exhaust and volatile organic compounds from architectural coatings and paving activities, may generate odors. However, these odors would be low in concentration, temporary, and are not expected to affect a substantial number of people. Therefore, odor impacts would be less than significant and no mitigation measures are necessary.

f) Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School?

No Impact. The proposed project would not result in an increase in enrollment at the existing high school; therefore, no new sensitive receptors would be introduced into the area. No impact would occur and no mitigation measures are necessary.

g) Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic

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corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste?

No Impact. The proposed project would not result in an increase in enrollment at the existing high school; therefore, no new sensitive receptors would be introduced into the area. No impact would occur and no mitigation measures are necessary.

5.4 BIOLOGICAL RESOURCES

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?

No Impact. As shown in Figure 3, *Aerial Photograph*, the project site is developed with the campus of San Clemente High School. Vegetation throughout the campus, including the two areas of improvements under the proposed project, consists of ornamental trees, shrubs, and grass. There is no suitable habitat for sensitive species within the confines of the project site. Additionally, there are no candidate, sensitive or special status species on the project site. Therefore, no impact would occur and no mitigation measures are necessary.

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?

No Impact. Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies; that are known to provide habitat for sensitive animal or plant species; or are known to be important wildlife corridors. Riparian habitats are those occurring along the banks of rivers and streams. As shown in Figure 3, the project site is developed with the campus of San Clemente High School. There are no riparian habitats or other sensitive natural community on or near the project site. Additionally, per Figure C-2 (Environmentally Sensitive Habitat Areas) of the City's General Plan Coastal Element, the project site is not within or near an environmentally sensitive habitat area. Therefore, no impact would occur and no mitigation measures are necessary.

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?

No Impact. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as swamps, marshes, and bogs. As shown in Figure 3, the project site is developed with the campus of San Clemente High School; there are no wetlands present on or near the project site. Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. The areas of improvement within the project site consist of parking lots, drive aisles, and other hardscape and landscape improvements associated with the campus of San Clemente High School. The overall project site is not available for overland wildlife movement. However, as part of the proposed project, a number of ornamental trees would be removed within the areas of improvement. The trees to be removed may provide suitable habitat, including nesting habitat, for migratory birds under the federal Migratory Bird Treaty Act (MBTA) and under Section 3513 et seq of the California Fish and Wildlife (CDFW) Code. CDFW Code 3513 provides protection to the birds listed under the MBTA, essentially all native birds. Additionally, Section 3503 of the CDFW Code makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. The MBTA implements the United States' commitment to four treaties with Canada, Japan, Mexico, and Russia for the protection of shared migratory bird resources. The MBTA governs the taking, killing, possession, transportation, and importation of migratory birds, their eggs, parts, and nests. Under the provisions of the MBTA, it is unlawful "by any means or manner to pursue, hunt, take, capture (or) kill" any migratory birds except as permitted by regulations issued by USFWS. The term "take" is defined by USFWS regulation to mean to "pursue, hunt, shoot, wound, kill, trap, capture or collect" any migratory bird or any part, nest or egg of any migratory bird covered by the conventions, or to attempt those activities. USFWS administers permits to take migratory birds in accordance with the MBTA.

The District would be required to comply with the MBTA by either avoiding site clearing, demolition or grading activities during the breeding/nesting season (February 1 to September 1, as defined by CDFW) or conducting a site survey for nesting birds prior to commencing such activities during the nesting season. Adherence to the MBTA regulations would ensure that if construction occurs during the breeding/nesting season, appropriate measures would be taken to avoid impacts to nesting birds, if any are found. With adherence to the MBTA requirements, impacts would be less than significant and no mitigation measures are necessary.

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

No Impact. Site clearance under the proposed project would involve the removal of a few ornamental trees from the proposed areas of improvement. However, the trees to be removed are ornamental and none are species that are considered sensitive and protected by local ordinances. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. The project site, which is developed with the campus of San Clemente High School, does not contain suitable habitat for sensitive species and is not within an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur and not mitigation measures are necessary.

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5.5 CULTURAL RESOURCES

The analysis in this section is based partly on the following technical study, which is included as Appendix B to this Initial Study:

- Phase I Cultural Resources Investigation, McKenna et al., January 29, 2016.

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

No Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Project development does not involve the demolition of any buildings or structures. The proposed project involves development of a new classroom building and associated hardscape and landscape improvements in an area of the lower campus that is currently developed with parking area and circulation improvements, which would be demolished under the proposed project. Additionally, a review by McKenna et al. of aerial photographs confirmed the auxiliary gym and surrounding improvements were completed between 2005 and 2009, making all improvements to the southeast of the gym (including the proposed area of improvements) modern additions to the campus and of no historical significance (McKenna 2016).

Project implementation also requires the removal or relocation of an existing portable building within the proposed area of improvements. However, a review by McKenna et al. of aerial photographs confirmed the portable classrooms and offices (abutting the southern end of the proposed area of improvements, including the one to be removed or relocated) were not present in 1997. The portable buildings are a modern addition to the campus and of no historical significance.

Therefore, no impact to historical resources would occur and no mitigation measures are necessary.

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

Less Than Significant With Mitigation Incorporated. The proposed project involves the development of a new classroom building and parking and circulation improvements in an area of the lower campus that is currently development with parking area and circulation improvements, which would be demolished under the proposed project. As the area of improvements has already been previously disturbed and developed, it has already been subject to similar construction and ground-disturbing activities associated with the proposed project. No archaeological or paleontological resources were identified during prior development of the proposed area of improvements (or within the overall campus development) and none were encountered during recent site surveys conducted by McKenna et al. as a part of the Cultural Resources Investigation prepared for the proposed project (see Appendix B). It is also unlikely that any such resources would be uncovered or affected during project-related grading and construction activities. Additionally, the potential for archeological or paleontological resources to be present in site soils that would be disturbed is lower than the potential would be on an undisturbed site. Furthermore, the recent survey by McKenna et al. of the

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proposed area of improvements confirmed there was no “native soil” exposed for visual inspection. The area is fully built and all improvements are modern.

However, while unlikely, the presence of subsurface archaeological or paleontological resources in the proposed area of improvements remains possible and could be affected by ground-disturbing activities associated with grading and construction in this area of the campus. While much of the area appears to be developed with minimal subsurface disturbances (e.g. asphalt pavement for parking and preparation of pads for temporary structures), it is possible that subsurface disturbance under the proposed project might occur at levels not previously disturbed (e.g., deeper excavation than previously performed in certain locations), or may uncover undiscovered archeological or paleontological resources at the site.

As a part of the Cultural Resources Investigation, McKenna et al. completed a standard archaeological records check through the California State University, Fullerton, South Central Coastal Information Center (records search provided in the appendices of the Cultural Resources Investigation). This research was designed to provide baseline information on studies completed within the area (one mile radius), site forms for recorded resources, and data pertaining to significant or listed properties in the area. In addition to the standard archaeological records check, McKenna et al. reviewed previous completed reports, obtained information on the historic development of the area, and assessed the relative level of sensitivity for the project area to yield historic or prehistoric archeological or paleontological resources. As concluded in the Cultural Resources Investigation, although there is no physical evidence of prehistoric archaeological resources for the overall school campus, the proposed area of improvements (as is the overall campus) is still considered highly sensitive for archeological resources. The campus is also considered highly sensitive for paleontological resources in relatively shallow contexts (McKenna 2016). This conclusion is based on the extent of resources identified within one mile of the school campus and the limited impacts that have occurred within the proposed area of improvements.

Furthermore, Figure C-2 (Locations of Historic and Prehistoric Archeological Resources) of the City’s General Plan Cultural Resources Element depicts the general location of areas within the City that potentially contain sensitive archeological resources; the project site appears to be within or abutting one of these areas.

For these reasons, potential impacts to archeological and/or paleontological resources could occur as a result of project-related construction activities. However, with implementation of Mitigation Measure CUL-1, impacts to archeological and paleontological resources would be reduced to less than significant levels.

Mitigation Measures

CUL-1 Prior to the commencement of demolition and grading activities in the proposed area of improvements, the District shall establish an archaeological/paleontological monitoring program to adequately identify and accurately record any resource(s) identified during demolition and grading activities. The contracted archaeological/paleontological monitor shall cover:

- Demolition or relocation of any existing structures and pavements.
- Grading and excavations needed to prepare the project area for new development.

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- All trenching for infrastructure and/or connections to existing infrastructure.
- Any areas identified as staging points that may be outside the actual project area boundaries (but still on the campus).

The archaeological monitoring program shall be completed using standard procedures and under the supervision of a trained supervisor meeting the Secretary of the Interior standards. If any prehistoric cultural resources are identified, a Native American (Juaneño) representative shall be added to the monitoring program. The program shall include the preparation of a technical report documenting the program and its findings.

The paleontological monitoring program shall follow standard policies and include a trained monitor, a plan for the identification, recovery, and curation of the materials recovered (if any), and preparation of a technical report documenting the program and its findings.

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

Less Than Significant With Mitigation Incorporated. See response to Section 5.5(b), above.

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

Less than Significant Impact. There are no known human remains on or near the project site, and there are no cemeteries within the vicinity of the site. Additionally, the proposed areas of improvement have already been previously disturbed and developed; they have already been subject to similar construction and ground-disturbing activities associated with the proposed project. Therefore, the likelihood that human remains may be discovered during site clearing and grading activities is considered extremely low. However, development of the proposed classroom building would involve ground-disturbing activities that could have the potential to disturb previously undiscovered sub-surface human remains, if any exist. For example, the classroom building may involve deeper excavation than previously performed in this area of the project site.

In the unlikely event that human remains are uncovered during ground-disturbing activities, California Health and Safety Code Section 7050.5 requires that disturbance of the site shall remain halted until the Los Angeles Coroner has conducted an investigation into the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. The coroner is required to make a determination within two working days of notification of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority or if the coroner recognizes or has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

Compliance with existing law regarding the discovery of human remains would reduce potential impacts to human remains to less than significant levels. No mitigation measures are necessary.

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e) **Would the project cause a substantial adverse change in the significance of a tribal cultural resource as defined in Public Resources Code 21074?**

Less than Significant Impact. Assembly Bill 52 requires meaningful consultation with California Native American Tribes on potential impacts to Tribal Cultural Resources, as defined in Public Resources Code §21074. A tribe must submit a written request to the relevant lead agency if it wishes to be notified of projects within its traditionally and culturally affiliated area. The lead agency must provide written, formal notification to the tribes that have requested it within 14 days of determining that a project application is complete, or deciding to undertake a project. The tribe must respond to the lead agency within 30 days of receipt of the notification if it wishes to engage in consultation on the project, and the lead agency must begin the consultation process within 30 days of receiving the request for consultation. Consultation concludes when either 1): the parties agree to mitigation measures to avoid a significant effect, if one exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. AB 52 also addresses confidentiality during tribal consultation per Public Resources Code §21082.3(c).

McKenna et al. conducted the Native American consultation under AB 52 by contacting the Native American Heritage Commission (NAHC) and inquiring into the presence/absence of significant tribal cultural resources and sites in the general area. In December 2015, NAHC provided McKenna et al. with a list of potential tribes for consultation purposes for the purpose of mitigating potential impacts to tribal cultural resources under CEQA. McKenna et al. also obtained a listing of Native Americans within Orange County and, where applicable, San Diego County, who have requested notification of projects and who may have information pertaining to a specific project area. Letters were sent to each of the tribes in early December 2015, which requested comments and responses from each of the tribes (the NAHC letter and letters sent to each of tribes are provided in Appendix B).

To date, only one of the tribes (United Coalition to Protect Panhe [UCPH]) responded to the letters sent by McKenna et al. However, the tribe did not request formal consultation under AB 52. The tribe (UCPH) simply requested that they continue to be kept informed of the proposed project and that they looked forward to further participation in the environmental review process. The comments or responses received by UCPH were incorporated into the Cultural Resources Investigation. Additionally, none of the others tribes responded to the consultation letters sent by McKenna et al.

Furthermore, as concluded above in Section 5.5(b), potential impacts to archeological and/or paleontological resources as a result of project-related construction activities would be reduced to less than significant levels with implementation of Mitigation Measure CUL-1.

Based on the preceding, impacts to tribal cultural resource would be less than significant and no mitigation measures are necessary.

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5.6 GEOLOGY AND SOILS

The analysis in this section is based partly on the following technical study, which is included as Appendix C to this Initial Study:

- Geotechnical Investigation, NMG Geotechnical, Inc. December 22, 2015.
 - Geologic and Environmental Hazards Assessment Report, PlaceWorks, February 2016.
- 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 a known fault? Refer to Division of Mines and Geology Special Publication 42.**

No Impact. The project site is not in or near an Alquist-Priolo Earthquake Fault Zone. The nearest Alquist-Priolo Earthquake Fault Zone is approximately 21.7 miles northeast of the project site for the Elsinore Fault (PlaceWorks 2016a). The closest major active fault to the project site is the Newport-Inglewood Fault, which is offshore approximately 4.8 miles west of the site (NMG 2015). Additionally, based on available data, no faults (active, potentially active, or inactive) are beneath the project site or projecting toward the site. Due to the distance to these faults and the fact that there are no faults that cross or are in proximity of the project site, the potential for surface rupture of a fault to occur on the site is considered negligible. Furthermore, based on a review of readily-available geologic literature and the City's General Plan, the project site is not on a pressure ridge (PlaceWorks 2016a). Therefore, development of the proposed project would not expose people or structures to substantial hazards arising from surface rupture of a known active fault. No impact would occur and no mitigation measures are necessary.

ii) **Strong seismic ground shaking?**

Less Than Significant Impact. The most significant geologic hazard to the design life of the proposed classroom building is the potential for moderate to strong ground shaking resulting from earthquakes generated on the faults within the seismically active southern California region. Given its location in this seismically active region, it is anticipated that the project site will periodically experience strong ground shaking as the result of earthquakes. As noted above, the nearest active fault to the project site is the Newport-Inglewood Fault, which is offshore approximately 4.8 miles west of the site.

However, the project site is not at greater risk of seismic activity or impacts than other sites in southern California. Seismic shaking is a risk throughout southern California. Additionally, the state regulates development in California through a variety of tools that reduce hazards from earthquakes and other geologic hazards. The California Building Code (CBC; California Code of Regulations, Title 24, Part 2) contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. The CBC contains provisions for earthquake safety based on factors including

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occupancy type, the types of soil and rock onsite, and the strength of ground motion with specified probability of occurring at the site. Design and construction of the proposed classroom building would be required to adhere to the provisions of the CBC. Compliance with the requirements of the CBC for structural safety during a seismic event would reduce hazards from strong seismic ground shaking.

Additionally, seismic design parameters for the proposed project have been provided in the Geotechnical Investigation prepared for the proposed project (see Appendix C); the seismic design parameters are based on the most current (2013) CBC. The proposed classroom building and other project-related site improvements would be designed and constructed in compliance with the recommendations provided in the Geotechnical Investigation, which would help reduce any potential hazards from strong seismic ground shaking.

Therefore, compliance with the CBC and implementation of the recommendations of the Geotechnical Investigation would reduce impacts resulting from strong seismic ground shaking to less than significant levels. No mitigation measures are necessary.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Other seismic-related ground failures are discussed in their respective sections: ground rupture (see Section 5.6(a)(i)) and landslides (see Section 5.6(a)(iv)).

Liquefaction refers to loose, saturated sand or silt deposits that behave as a liquid and lose their load-supporting capability when strongly shaken. Loose granular soils and silts that are saturated by relatively shallow groundwater are susceptible to liquefaction. The project site is located within an area of potential liquefaction, as defined by the State's Seismic Hazard Mapping Act (NMG 2015). Additionally, as shown in Figure S-1 (Geologic, Seismic and Soil Hazards Map) of the City's General Plan Safety Element, the project site is within an area of potential liquefaction. However, as concluded in the Geotechnical Investigation (see Appendix C), based on NMG's review of the groundwater and underlying bedrock conditions at the site, the liquefaction potential is considered very low to nil. In addition, the proposed project is required to be evaluated for the potential for liquefaction under the oversight of California Geological Survey and Division of the State Architect. Therefore, impacts resulting from liquefaction would be less than significant and no mitigation measures are necessary.

iv) Landslides?

Less than Significant Impact. Landslides are the downslope movement of geologic materials. Slope failures in the form of landslides are common during strong seismic shaking in areas of steep hills. The adjacent hillside to the southeast of the project site, which supports existing residential development, is mapped in a seismic hazard zone for earthquake-induced landslide potential. The slope of the hillside is approximately 25-feet high. However, the distance to the toe of slope was measured during the site reconnaissance conducted by NMG; it is located approximately 200 linear feet away from the new classroom building that would be developed under the proposed project. Additionally, based on review by NMG of the final geotechnical reports documenting grading of the slope and associated residential development, the slope was adequately engineered. Furthermore, the 10-foot-high slope adjacent to the

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new classroom building consists of artificial fill overlying cohesive, uniform terrace deposits; this slope was also adequately engineered (NMG 2015). Therefore, the potential for earthquake-induced landslides onsite from either the hillside or slope is considered low to nil. Impacts related to landslides would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Erosion is the movement of rock and soil from place to place, and is a natural process. Common agents of erosion in the project region include wind and flowing water. Significant erosion typically occurs on steep slopes where stormwater and high winds can carry topsoil down hillsides. Erosion can be increased greatly by earthmoving activities if erosion-control measures are not used. Following is a discussion of the potential erosion impacts resulting from the proposed project's construction and operational phases.

Construction Phase

Project development would involve excavation, grading, and construction activities that would disturb soil and leave exposed soil on the ground surface. Common means of soil erosion from construction sites include water, wind, and being tracked offsite by vehicles. These activities could result in soil erosion. However, project development is subject to local and state codes and requirements for erosion control and grading during construction. Project development is required to comply with standard regulations, including South Coast Air Quality Management District Rules 402 and 403, which would reduce construction erosion impacts. Rule 403 requires that fugitive dust be controlled with best available control measures so that the presence of such dust does not remain visible in the atmosphere beyond the property line of the emissions source. Rule 402 requires dust suppression techniques be implemented to prevent dust and soil erosion from creating a nuisance offsite.

Additionally, the Construction General Permit (CGP) issued by the State Water Resources Control Board (SWRCB), effective July 17, 2012, regulates construction activities to minimize water pollution, including sediment. The proposed improvements at the project site would be subject to National Pollution Discharge Elimination System (NPDES) permitting regulations, including the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP), which is further discussed in Section 5.9, *Hydrology and Water Quality*. The proposed project's construction contractor would be required to prepare and implement a SWPPP and associated BMPs in compliance with the CGP during grading and construction. Types of BMPs that are incorporated in SWPPPs are described in Table 5.

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Table 5 Construction BMPs

Category	Purpose	Examples
Erosion Controls and Wind Erosion Controls	Cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind	Mulch, geotextiles, mats, hydroseeding, earth dikes, swales
Sediment Controls	Filter out soil particles that have been detached and transported in water.	Barriers such as straw bales, sandbags, fiber rolls, and gravel bag berms; desilting basin; cleaning measures such as street sweeping
Tracking Controls	Minimize the tracking of soil offsite by vehicles	Stabilized construction roadways and construction entrances/exits; entrance/outlet tire wash.
Non-Storm Water Management Controls	Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance, and fueling of vehicles and equipment. Conduct various construction operations, including paving, grinding, and concrete curing and finishing, in ways that minimize non-stormwater discharges and contamination of any such discharges.	BMPs specifying methods for: paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing.
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater.	Spill prevention and control, stockpile management, and management of solid wastes and hazardous wastes.

Source: CASQA 2003.

Adherence to the BMPs to be specific in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. Therefore, soil erosion impacts from project-related grading and construction activities would not occur and soil erosion impacts would be less than significant. No mitigation measures are necessary.

Operational Phase

After project completion, the areas of improvement would be developed with a new classroom building, drive aisles, and other hardscape and landscape improvements; there would be no areas of exposed soil. Upon project completion, the potential for soil erosion or the loss of topsoil is expected to be extremely low. Project operation would not result in substantial soil erosion. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Hazards from liquefaction and lateral spreading are addressed above in Section 5.6(a)(iii), and landslide hazards are addressed above in Section 5.6(a)(iv).

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Subsidence

The major cause of ground subsidence is withdrawal of groundwater. The project site is not above or near a groundwater basin. Additionally, groundwater encountered during NMG's recent investigation conducted as a part of the Geotechnical Investigation was at a depth of 39 feet below existing ground surface (NMG 2015); no shallow groundwater was encountered onsite. Furthermore, the project site is already developed with similar buildings, which have not been subject to any occurrences of subsidence. Therefore, impacts related to subsidence would be less than significant and no mitigation measures are necessary.

Collapsible Soils

As stated in the site-specific Geotechnical Investigation prepared for the proposed project (see Appendix C), the results of consolidation tests conducted by NMG did not indicate any hydro-collapse potential onsite. Additionally, the Geotechnical Investigation contains recommendations for site preparation and grading for the proposed classroom building. The classroom building would be designed and constructed in compliance with the recommendations provided in the Geotechnical Investigation. Therefore, impacts related to collapsible soils would be less than significant and no mitigation measures are necessary.

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?

Less Than Significant Impact. Expansive soils shrink or swell as the moisture content decreases or increases; the shrinking or swelling can shift, crack, or break structures built on such soils. As stated in the Geotechnical Investigation prepared for the proposed project (see Appendix C), most of the onsite material is of high expansion potential. However, recommendations have been provided in the Geotechnical Investigation for reducing hazards from expansive soils. Project development would comply with the recommendations of the Geotechnical Investigation and would not exacerbate hazards arising from expansive soils.

Additionally, through the development review process, the California Geologic Survey and Division of the State Architect ensure that school buildings are tested for, and if necessary, sufficiently mitigated for any expansive soil condition encountered. Therefore, impacts related to expansive soils would be less than significant and no mitigation measures are necessary.

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

No Impact. Project development would include installation of sewer laterals connecting to existing sewer lines within the school campus. The proposed classroom building does not include the use of septic tanks or other alternative wastewater disposal systems. Therefore, no impact would occur and no mitigation measures are necessary.

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5.7 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO₂), methane (CH₄), and ozone (O₃)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydro fluorocarbons, per fluorocarbons, and chlorofluorocarbons.^{1, 2}

This section analyzes the proposed project's contribution to global climate change impacts in California through an analysis of project-related GHG emissions. Information on manufacture of cement, steel, and other “life cycle” emissions that would occur as a result of the project are not applicable and are not included in the analysis.³ A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A.

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

Less Than Significant Impact. Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

¹ Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

² Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of PM emitted from burning fuels. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (CARB 2014b). However, state and national GHG inventories do not yet include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

³ Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

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The proposed project would generate GHG emissions from energy use (indirectly from purchased electricity use and directly through fuel consumed for building heating) and area sources (e.g., equipment used on-site, consumer products, coatings). Annual GHG emissions were calculated for construction and operation of the project. Annual average construction emissions were amortized over 30 years and included in the emissions inventory to account for GHG emissions from the construction phase of the project. Project-related GHG emissions are shown in Table 6. As shown in the table, the proposed project at buildout would generate 87 metric tons of carbon dioxide-equivalent (MTCO_{2e}) emissions annually. The total GHG emissions onsite from the project would be nominal and would not exceed the SCAQMD's bright-line threshold of 3,000 MTCO_{2e}.⁴ Therefore, the proposed project's cumulative contribution to GHG emissions is less than significant and no mitigation measures are necessary.

Table 6 Project-Related GHG Emissions at Buildout

Source	MTCO _{2e} /year	Percent of Project Total
Area	<1	<1%
Energy ¹	79	91%
Amortized Construction Emissions ²	8	9%
Total Emissions	87	100%
SCAQMD's Bright-Line Threshold	3,000	NA
Exceeds Bright-Line Threshold	No	NA

Source: CalEEMod Version 2013.2.2.

Notes: Percent changes from each source may not total to 100 percent due to rounding. MTCO_{2e} = metric tons of carbon dioxide-equivalent

¹ Assumes implementation of the 2013 California Green Building Standards Code (CALGreen) and 2013 Building and Energy Efficiency Standards. The 2013 Building and Energy Efficiency Standards are 30 percent more energy efficient than the 2008 Standards for non-residential buildings and 25 percent more energy efficient for residential buildings than the 2008 Standards. Additionally, implementation of the SDG&E's Savings by Design program, which is 10 percent more energy efficient relative to the 2013 Building and Energy Efficiency Standards, is also assumed for the proposed project. Overall, modeling assumes all structures onsite would be 37 percent more energy-efficient than the 2008 building code for non-residential structures.

² Construction emissions are amortized over a 30-year project lifetime per recommended SCAQMD methodology.

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

No Impact. The California Air Resources Board's (CARB's) Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by Assembly Bill (AB) 32, which is to return to 1990 emission levels by year 2020. To estimate the reductions necessary, CARB projected statewide 2020 business-as-usual (BAU) GHG emissions and identified that the state as a whole would need to reduce GHG emissions by 28.5 percent from year 2020 BAU to achieve the target of AB 32 (CARB 2008). The GHG emissions forecast was updated as part of the First Update to the Scoping Plan. In the First Update to the Scoping Plan, CARB projected that statewide BAU emissions in 2020 would be approximately 509 million MTCO_{2e}.⁵ Therefore, to achieve the AB 32 target of 431 million MTCO_{2e} (i.e., 1990 emissions

⁴ This threshold is based on a combined threshold of 3,000 MTCO_{2e} for all land use types, proposed by SCAQMD's Working Group based on a survey of the GHG emissions inventory of CEQA projects. Approximately 90 percent of CEQA projects' GHG emissions inventories exceed 3,000 MTCO_{2e}, which is based on a potential threshold approach cited in CAPCOA's white paper, "CEQA and Climate Change."

⁵ The BAU forecast includes GHG reductions from Pavley and the 33% Renewable Portfolio Standard (RPS).

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levels) by 2020, the State would need to reduce emissions by 78 million MTCO₂e compared to BAU conditions, a reduction of 15.3 percent from BAU in 2020 (CARB 2014b).^{6, 7}

Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard (LCFS), California Appliance Energy Efficiency regulations, California Renewable Energy Portfolio standard, changes in the Corporate Average Fuel Economy (CAFE) standards, and other early action measures as necessary to ensure the state is on target to achieve the GHG emissions reduction goals of AB 32. Also, new buildings are required to comply with the 2013 Building and Energy Efficiency Standards and 2013 California Green Building Code (CALGreen). In addition, the proposed classroom building would be designed in accordance with SDG&E's Savings By Design program. The program encourages high-performance and energy-efficient, non-residential building design and construction. Under the Savings by Design program, the proposed project would be 10 percent more efficient than the required 2013 California Building and Energy Efficiency Standards. The project's GHG emissions would be reduced from compliance with statewide measures that have been adopted since AB 32 was adopted.

In addition to AB 32, the California legislature passed Senate Bill (SB) 375 to connect regional transportation planning to land use decisions made at a local level. SB 375 requires the metropolitan planning organizations to prepare a Sustainable Communities Strategy (SCS) in their regional transportation plans to achieve the per capita GHG reduction targets. For the Southern California Association of Governments (SCAG) region, the SCS was adopted in April 2012 (SCAG 2012) and SCAG is currently updating the SCS. The SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency for governments and developers. The proposed project is consistent with the underlying General Plan land use designation and would not interfere with SCAG's ability to implement the regional strategies outlined in the Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS).

Based on the preceding, no impact would occur and no mitigation measures are necessary.

5.8 HAZARDS AND HAZARDOUS MATERIALS

The analysis in this section is based partly on the following technical study, which is included as Appendices D and E to this Initial Study:

- Geologic and Environmental Hazards Assessment Report, PlaceWorks, February 2016.
- Phase I Environmental Site Assessment, PlaceWorks, January 2016.

⁶ If the GHG emissions reductions from Pavley I and the Renewable Electricity Standard are accounted for as part of the BAU scenario (30 million MTCO₂e total), then the State would need to reduce emissions by 108 million MTCO₂e, which is a 20 percent reduction from BAU.

⁷ In May 2014, CARB completed a five year update to the 2008 Scoping Plan. CARB recalculated the 1990 GHG emission levels with the updated global warming potential (GWP) in the Intergovernmental Panel on Climate Change's Fourth Assessment Report, and the 427 MMTCO₂e 1990 emissions level and 2020 GHG emissions limit, established in response to AB 32, is slightly higher, at 431 MMTCO₂e (CARB 2014b).

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

Less Than Significant Impact. Project-related construction activities would not require or involve extensive or ongoing use of acutely hazardous materials or substances. While grading and construction may involve activities requiring the transport, storage, use, or disposal of some hazardous materials, such as onsite fueling or servicing of construction equipment, the activities would be short term and would be subject to federal, state, and local health and safety requirements.

The types of hazardous materials associated with project operation would generally be limited to maintenance, janitorial, and repair activities, such as commercial cleansers, lubricants, paints, etc. All hazardous materials used at the campus would be stored, handled, and disposed of in compliance with regulations of the Environmental Protection Agency (EPA), Occupational Safety and Health Administration, and Orange County Environmental Health.⁸ The requirements of these agencies would be incorporated into the design and operation of the proposed project. For example, this would include providing for and maintaining appropriate storage areas for hazardous materials and installing or affixing appropriate warning signs and labels. Compliance with existing regulations would also include training construction workers and school staff on containing and cleaning up hazardous materials spills that such personnel could safely contain and clean; maintenance of hazardous materials spill containment and cleanup supplies onsite; implementing school evacuation procedures as needed; and contacting the appropriate hazardous materials emergency response agency immediately pursuant to requirements of regulatory agencies.

Compliance with applicable health and safety requirements, including manufacturers' product labels, would ensure that no significant hazard to the public, the students, or the environment would result through the routine transport, use, or disposal of hazardous materials during the project construction and operational phases. Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact.

Hazardous Materials Associated with Project Construction and Operation

See response to Section 5.8(a), above. The analysis provided in Section 5.8(a) concludes that impacts due to the use, storage, transportation, and disposal of hazardous materials during the project construction and operation phases would be less than significant.

Hazardous Materials Existing Onsite

Project development requires demolition of existing parking and circulation improvements in the proposed area of improvements (see Figures 3, *Aerial Photograph*, and 4, *Site Photographs*, for hardscape improvements to

⁸ Orange County Environmental Health is the Certified Unified Program Agency (CUPA) for Orange County; the Certified Unified Program coordinates and makes consistent enforcement of several state and local laws governing hazardous materials.

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be demolished). No building or structures would be demolished. Additionally, as concluded in the Phase I Environmental Site Assessment (ESA) prepared for the proposed project, no recognized environmental conditions (RECs) were identified for the project site. Additionally, controlled RECs, historic RECs and known environmental conditions associated with the project site were not identified (PlaceWorks 2016b). Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less than Significant Impact. Project construction and operation would not cause substantial hazards to persons on campus for the reasons stated above in Section 5.8(a). Therefore, impacts would be less than significant and no mitigation measures are necessary.

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

Less than Significant Impact. California Government Code Section 65962.5 requires the compiling of lists of the following types of hazardous materials sites: hazardous waste facilities subject to corrective action; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated.

A search of regulatory agency databases (state and federal) containing known and suspected sites of environmental contamination was conducted as a part of the Phase I ESA prepared for the proposed project (see Appendix E). As concluded in the Phase I ESA, the school campus was listed in the following databases searched:

- The school campus is listed on the California Hazardous Material Incident Report System (CHMIRS) database for a “test tube sized” release of mercury on June 23, 2015. The release of a small quantity of mercury was located over 350 feet north of the proposed area of improvements, and was cleaned up by the Orange County Fire Authority. Based on the small quantity, cleanup that took place, and the distance from the proposed area of improvements, no impact is expected from this listing.
- The school campus is listed on the registered Underground Storage Tank (UST) list. A 350 gallon waste oil UST is located near the auto shop classroom building over 850 feet northeast of the proposed area of improvements. No violations or leaks were reported. Based on the regulatory status and distance from the proposed area of improvements, no impact is expected from this listing.
- The school campus was identified as having disposed of laboratory waste and other chemicals under Hazardous Waste Manifests. All such waste was disposed of in accordance with applicable regulations and requirements, including preparation of the Uniform Hazardous Waste Manifest, which is the shipping document that travels with hazardous waste from the point of generation, through

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transportation, to the final treatment, storage, and disposal facility. Based on the regulatory status, no impact is expected from this listing.

Additionally, based on the Phase I ESA and Geologic and Environmental Hazards Assessment Report prepared for the proposed project, the project site is not located within a 10-mile radius of any naturally-occurring serpentine rock or rock formations that may contain a significant quantity of asbestos. The nearest outcrop of serpentine rock is located on Santa Catalina Island offshore and southwest of the site.

Based on the preceding, impacts would be less than significant and no mitigation measures are necessary.

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

No Impact. There are no public-use airports within two miles of the project site. Project development would not cause hazards related to aircraft safety hazards. Therefore, no impact would occur and no mitigation measures are necessary.

- 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?**

No Impact. There are no heliports or other private air strips near or in the vicinity of the project site. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. The local emergency response plan in effect is the Orange County Emergency Plan, which is developed and maintained by the Emergency Management Division of the Orange County Sheriff's Department. Project construction and operation would not block roadways or otherwise impair emergency access to surrounding land uses. All construction staging and activities would occur onsite. Additionally, public schools are built to more rigorous building and safety standards than are many other types of buildings; and schools are therefore often used as evacuation centers during disaster responses. Therefore, no impact would occur and no mitigation measures are necessary.

- 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?**

Less Than Significant Impact. The project site is not in a fire hazard severity zone as mapped by the California Department of Forestry and Fire Prevention (CAL FIRE 2011). Therefore, project development would not subject people or structures to wildfire hazards. Impacts would be less than significant and no mitigation measures are necessary.

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- i) **Does the proposed school site contain one or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood?**

No Impact. The project site is developed with the campus of San Clemente High School. There are no chemical pipelines within a 1,500-foot radius, according to the National Pipeline Mapping System online mapping database (NPMS 2016). Additionally, based on the response from the Southern California Gas Company, there are no high-pressure natural gas pipelines within a 1,500-foot radius of the project site (PlaceWorks 2016a). Furthermore, no underground or aboveground pipelines carrying hazardous materials or hazardous wastes were identified on or in proximity of the project site during development of the existing campus. Therefore, no impact would occur and no mitigation measures are necessary.

- j) **Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?**

No Impact. Section 17213 of the California Education Code and Section 21151.8 of the California Public Resources Code prohibit construction of a school on a current or former hazardous waste disposal site or solid waste disposal site. Based on a site inspection conducted by PlaceWorks staff and information reviewed for preparation of the Phase I ESA (see Appendix E), the school campus is not located on a current or former disposal site; the site is developed with the campus of San Clemente High School. Therefore, no impact would occur and no mitigation measures are necessary.

- k) **Is the project site a hazardous substance release site identified by the state Department of Health Services in a current list adopted pursuant to §25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code?**

Less Than Significant Impact. See response to Section 5.8(d), above.

5.9 HYDROLOGY AND WATER QUALITY

The analysis in this section is based partly on the following technical study, which is included as Appendix D to this Initial Study:

- Geologic and Environmental Hazards Assessment Report, PlaceWorks, February 2016.

- a) **Violate any water quality standards or waste discharge requirements?**

Less Than Significant Impact.

Construction Phase

Project development would include preparation and implementation of a SWPPP and implementation of BMPs outlined in the SWPPP (see Section 5.6(b) above for description). Implementation of the BMPs would

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reduce impacts of project construction on stormwater quality. Therefore, construction-related impacts would be less than significant and no mitigation measures are necessary.

Operation Phase

Regulations on waste discharges to storm drains are set forth in the Municipal Stormwater Permit for the San Diego Region, Order No. R9-2013-0001 issued by the San Diego Regional Water Quality Control Board (SDRWQCB) in 2013. The District would prepare and implement a water quality management plan (WQMP) identifying BMPs that would be included in the project design and installed during project construction to minimize stormwater pollution. Low-impact development (LID) BMPs are required as part of the project. LID BMPs maximize infiltration, provide retention, slow runoff, minimize impervious footprint, direct runoff from impervious areas into landscaping, and construct impervious surfaces to minimum widths necessary. There are many practices that have been used to adhere to these principles such as bioretention facilities, rain gardens, vegetated rooftops, rain barrels, and permeable pavements. The proposed project's WQMP would specify BMPs in two other categories.

- **Source Control BMPs** reduce the potential for pollutants to enter runoff. Source control BMPs are divided into two types:
 - Structural source control BMPs are included in the design of projects and include roof runoff controls, protection of slopes and channels, efficient irrigation, and storm drain system signage.
 - Nonstructural source control BMPs consist of activity restrictions, such as requiring that trash can lids be closed at all times and prohibiting outdoor cooking; education of school staff; and periodic inspections and maintenance of water quality features such as catch basins and filters.
- **Treatment Control BMPs** remove pollutants from contaminated stormwater before the water is discharged offsite. Treatment control BMPs include filters and biofiltration through constructed project landscape elements such as bioswales, infiltration trenches, and/or infiltration basins.

Project operation would comply with the water quality requirements set forth by SDRWQCB through preparation of a WQMP. Implementation of the BMPs in the WQMP would reduce impacts of project operation on stormwater quality. Therefore, operational-related impacts would be less than significant and no mitigation measures are necessary.

- 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)?**

Less than Significant Impact. The project site is not over or near a groundwater recharge basin and is not used for intentional groundwater recharge; the site is developed with the campus of San Clemente High School. Therefore, the proposed project would not substantially interfere with groundwater supplies or groundwater recharge. Impacts would be less than significant and no mitigation measures are necessary.

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Impacts to groundwater supplies are further discussed in Section 5.17(d), below.

- 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 a substantial erosion or siltation on- or off-site.**

Less Than Significant Impact. Erosion and siltation impacts potentially resulting from the proposed project would, for the most part, occur during the project's sites preparation and grading phase. However, there is also a potential for erosion and siltation to occur during project operation. Following is a discussion of the potential impacts that could occur during the construction and operation phases of the proposed project.

Project Construction

As discussed above in Section 5.9(a), the District would prepare and implement a SWPPP during grading and construction activities. The SWPPP would specify BMPs the District would implement prior to and during grading and construction to minimize erosion and siltation impacts on- and offsite. For example, BMPs would include but are not limited to: installation of perimeter silt fences, installation of silt fences around stockpile and covering of stockpiles, and stabilization of disturbed areas where construction ceases for a determined period of time (e.g., one week) with erosion controls. Adherence to the BMPs in the SWPPP would reduce, prevent, or minimize soil erosion from project-related grading and construction activities. Therefore, construction-related impacts would be less than significant and no mitigation measures are necessary.

Project Operation

Project development would not alter the existing drainage pattern on the school campus. The project would include installation of a storm drain from the edge of the proposed classroom building to a storm drain connection on the school campus. At project completion, the areas of improvement would consist of a classroom building, driveway improvements, and landscaped areas. There would be no areas of bare or disturbed soil onsite that would be vulnerable to erosion or siltation. All areas would either be paved or landscaped. Therefore, development of the proposed project would not substantially alter the existing drainage pattern of the project site or area in a manner that would result in substantial erosion or siltation on- or offsite. Operation-related impacts would be less than significant and no mitigation measures are necessary.

- d) Substantially alter the existing drainage pattern of the site or area, including through the 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?**

Less Than Significant Impact. Project development would not alter the existing drainage pattern on the school campus. Project development would include installation of an onsite drainage system connecting to a storm drain on the school campus, as described above in Section 5.9(c). Additionally, the project site and surrounding area have already been planned and engineered to accommodate stormwater runoff. Therefore, project development would not substantially alter the existing drainage pattern of the site or substantially

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increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. Impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. The project site and surrounding area have been planned and engineered to accommodate stormwater runoff. Additionally, the proposed project would include the installation of LID BMPs that would minimize runoff from the site through a variety of measures such as minimizing impervious areas. Therefore, runoff from the proposed areas of improvement would not exceed the capacity of proposed onsite or existing offsite drainage facilities. Impacts would be less than significant and no mitigation measures are necessary.

f) Otherwise substantially degrade water quality?

Less Than Significant Impact. Water quality impacts would be less than significant, as substantiated above in Section 5.9(a).

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?

No Impact. The project site is not located within a 100-year flood zone as indicated on the Federal Emergency Management Agency Flood Insurance Rate Map (FIRM) Number's 06059C0528J (effective December 3, 2009) and 06073C0100F (effective May 16, 2012) covering the project site and surrounding area (FEMA 2016). Additionally, the proposed project does not include the development of housing. Therefore, no impact would occur and no mitigation measures are necessary.

h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?

No Impact. As noted above, the project site is outside of a 100-year flood zone (FEMA 2016). Development of the proposed project would not impede or redirect flood flows. Therefore, no impact would occur and no mitigation measures are necessary.

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?

No Impact. According to the California Emergency Management Agency maps (2007), the project site does not lie within a zone of potential dam inundation (PlaceWorks 2016a). Therefore, no impact would occur and no mitigation measures are necessary.

j) Inundation by seiche, tsunami, or mudflow?

No Impact. The following describes potential impacts to people and structures from seiches, tsunamis, and mudflows. As demonstrated below, the proposed project would not expose people or structures to inundation by seiche, tsunami, or mudflow.

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Seiche

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam or other artificial body of water. There are no water storage facilities or bodies of water on or topographically upgradient in the immediate vicinity of the project site that could pose a flood hazard to the site due to a seiche or failure of an aboveground reservoir. Therefore, no impacts from a seiche would occur and no mitigation measures are necessary.

Tsunami

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. As shown in Figure S-3 (Tsunami Potential Inundation Map) of the City's General Plan Safety Element, the project site is not in a tsunami inundation risk area. Additionally, according to the Tsunami Inundation Map for Emergency Planning, the project site is not within a Tsunami Inundation Area (PlaceWorks 2016a). Therefore, no impacts from a tsunami would occur and no mitigation measures are necessary.

Mudflow

A mudflow is a landslide composed of saturated rock debris and soil with a consistency of wet cement. There is an existing hillside adjacent to the southeast portion of the project site; however, as stated above in Section 5.6(a)(iv), the hillside has been adequately engineered. Therefore, the hillside is unlikely to generate substantial mudflows. No impacts from a mudflow would occur and no mitigation measures are necessary.

5.10 LAND USE AND PLANNING

a) Physically divide an established community?

No Impact. The project site is surrounded by commercial uses and open space to the north; commercial uses and I-5 to the west; residential uses and I-5 to the south; and residential uses to the east (see Figure 3, *Aerial Photograph*). While there are established residential communities to the south and east, development of the proposed project would not physically divide these communities. All improvements under the proposed project would occur within the confines of the project site and no roadways or other infrastructure improvements that would bisect or transect the existing residential communities would be introduced. Additionally, access to the residential communities would not be interrupted as a result of the project development, as residents of the community do not have to cross the project site to access their community. Therefore, the proposed project would not create any land use barriers or otherwise divide or disrupt the physical arrangement of the existing residential communities. No impacts would occur and no mitigation measures are necessary.

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- 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?**

No Impact. Per the City's General Plan land use map and zoning map, the project site is designated and zoned P (Public). The proposed improvements are consistent with the existing institutional uses onsite and with the Public land use and zoning designations of the project site, which permit institutional uses by right. Project implementation would not lead to a change of existing land uses or require a change of the existing land use or zoning designations or regulations. Therefore, no land use impacts would occur and no mitigation measures are necessary.

- c) Conflict with any applicable habitat conservation plan or natural community conservation plan?**

No Impact. The project site, which is developed with the campus of San Clemente High School, does not contain suitable habitat for sensitive species and is not within an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan. Therefore, no impact would occur and not mitigation measures are necessary.

5.11 MINERAL RESOURCES

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

No Impact. The project site is mapped as Mineral Resource Zone 1 (MRZ-1) and MRZ-3 by the California Geological Survey: MRZ-1 indicates that it is in an area where no significant mineral deposits are present, or where it is judged that such deposits are unlikely to be present; MRZ-3 indicates areas containing mineral deposits the significance of which cannot be evaluated from available data (CGS 1994). The project site is developed with the campus of San Clemente High School and is not available for mining. Additionally, the project site is in an urbanized area of the City and surrounded by commercial and residential uses. There are no active mines on or next to the project site (OMR 2016). Furthermore, the project site is not in a Mineral Resource Area; the nearest such area to the site is approximately 4.5 miles to the northeast within the San Juan Creek area (OCPW 2012). Therefore, project development would not cause a loss of availability of a known mineral resource valuable to the region and the state or a loss of availability of a mineral resource recovery site. No impact would occur and no mitigation measures are necessary.

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

No Impact. See response to Section 5.11(a), above.

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5.12 NOISE

Noise Descriptors

Noise is most often defined as unwanted sound. Although sound can be easily measured, the perception of noise and the physical response to sound complicate the analysis of its impact on people. People judge the relative magnitude of sound sensation in subjective terms such as “noisiness” or “loudness.”

The following are brief definitions of terminology used in this section:

- **Sound.** A disturbance created by a vibrating object, which, when transmitted by pressure waves through a medium such as air, is capable of being detected by a receiving mechanism, such as the human ear or a microphone.
- **Noise.** Sound that is loud, unpleasant, unexpected, or otherwise undesirable.
- **Decibel (dB).** A unitless measure of sound on a logarithmic scale.
- **A-Weighted Decibel (dBA).** An overall frequency-weighted sound level in decibels that approximates the frequency response of the human ear.
- **Equivalent Continuous Noise Level (L_{eq}).** The mean of the noise level, energy averaged over the measurement period.
- **Community Noise Equivalent Level (CNEL).** The energy average of the A-weighted sound levels occurring during a 24-hour period, with 5 dB added from 7:00 PM to 10:00 PM and 10 dB from 10:00 PM to 7:00 AM.

With respect to projected increases, noise impacts can be broken down into three categories. The first is “audible” impacts, which refer to increases in noise level that are perceptible to humans. Audible increases in general community noise levels generally refer to a change of 3 dB or more since this level has been found to be the threshold of perceptibility in exterior environments. The second category, “potentially audible” impacts, refers to a change in noise level between 1 and 3 dB. This range of noise levels was found to be noticeable to sensitive people in laboratory environments. The last category includes changes in noise level of less than 1 dB that are typically “inaudible” to the human ear except under quiet conditions in controlled environments. Only “audible” changes in noise levels at sensitive receptor locations (i.e., 3 dB or more) are considered potentially significant. Note that a doubling of traffic flows (i.e., 10,000 vehicles per day to 20,000 per day) would be needed to create a 3 dB increase in traffic-generated noise levels.

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Existing Conditions

The portion of the lower campus where improvements would occur (proposed area of improvements) is surrounded by permanent classroom buildings to the northeast; portable classrooms to the southeast; two portable classrooms and a turf playfield to the southwest; and a gymnasium, an electrical building, and a small paved area to the northwest. The proposed area of improvements is surrounded by single-family residences (upslope from the campus to the southeast); the school's football/soccer stadium to the southwest; a second gymnasium to the northwest; and additional classroom buildings to the northeast (see Figures 3, *Aerial Photograph*, and 5, *Lower Campus Site Plan*). The nearest on-campus parking lot to the proposed area of improvements (other than the existing, onsite lot) is a lot along the southeast campus boundary approximately 205 feet to the northeast. Other than this onsite lot, there are driveways near the proposed area of improvements, but they are fire access roadways and do not carry substantial vehicular traffic.

The major existing noise source on the proposed area of improvements is operational noise from motor vehicles. Another noise source is people talking. The school day (counting from Period 1) extends from 7:55 AM to 2:45 PM Tuesday through Friday, and 8:20 AM to 2:45 PM Monday.

Pertinent Noise Standards

City of San Juan Capistrano Noise Ordinances

Pertinent Operational Noise Standards

Exterior noise standards for residential, public, and institutional districts in San Juan Capistrano are set forth in Municipal Code Section 9-3.531.

- 65 dB(A) between 7:00 AM and 7:00 PM
- 55 dB(A) between 7:00 PM and 10:00 PM
- 45 dB(A) between 10:00 PM and 7:00 AM

Pertinent Construction Noise Standards

Construction noise is exempt from exterior noise standards set forth in Municipal Code Section 9-3.531 if the construction activities are conducted between 7:00 AM and 6:00 PM Monday through Friday or 8:30 AM to 4:30 PM Saturday.

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

Less Than Significant Impact.

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Operational Noise Impacts

On-Campus Impacts

Student-Related Noise Sources

Project development would not result in an increase the overall number of students or staff on campus and, therefore, is not expected to increase area-wide noise generation from motor vehicle trips. However, project development could increase numbers of students and staff in the area immediately surrounding the proposed classroom building, as compared to existing conditions. The proposed classroom building would have capacity for 648 students at the state loading standard of 27 seats per classroom for secondary schools. Considering existing uses on the campus surrounding the proposed area of improvements – permanent and portable classroom buildings, a gymnasium, and a turf playfield – any such increases in numbers of people surrounding the proposed classroom building would not be substantial. Therefore, no substantial increase in noise from people talking would occur.

Stationary Equipment Noise Sources

Heating, ventilation, and air conditioning equipment on top of the proposed classroom building would be similar to such equipment on existing adjacent and nearby buildings on the campus. Additionally, this equipment would be placed within appropriate sound enclosures or parapets such that the operations would not be notably different than existing conditions in and around the proposed area of improvements and would not exceed the City's exterior noise standards. Therefore, no significant impacts would occur and no mitigation measures are necessary.

Off-Campus Impacts

The nearest residential property lines to the proposed area of improvements are approximately 185 feet to the southeast. Since sound diminishes rapidly with distance, any operational noise emissions from either increased numbers of people talking or new mechanical equipment would be reduced such that project-related sources would not exceed the City's noise standards (at these nearest receptors or beyond).

Construction Noise Impacts

Construction would occur between 7:00 AM and 4:00 PM Monday through Friday, during the time when construction noise is exempted from the City's noise standards. Project-generated construction noise would not exceed the City's noise standards. Therefore, impacts would be less than significant and no mitigation measures are necessary. Additional discussion is also presented below under Section 5.12(d), below.

b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Ongoing Operations Vibration Impacts

For potential project-generated vibration impacts to nearby receptors, the proposed project would not include equipment that could generate substantial levels of long-term groundborne vibration levels.

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Therefore, vibration from onsite project sources is not significant, and no further evaluation of ongoing vibration impacts would be required. No mitigation measures are necessary.

Short-Term Construction Vibration Impacts

Construction activities can generate ground vibration that varies depending on the construction procedures, equipment used, and proximity to vibration-sensitive uses. Such vibrations may have two types of potential impacts: (a) architectural damage to nearby buildings and (b) annoyance to vibration-sensitive receptors.

Construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance. Table 7 shows the peak particle velocities of some common construction equipment and haul trucks (loaded trucks).

Table 7 Typical Vibration Levels Produced by Common Construction Equipment

Equipment	Peak Particle Velocity in inches per second		
	at 25 feet	At 50 feet	at 150 feet
Vibratory Roller	0.210	0.074	0.014
Large Bulldozer	0.089	0.031	0.006
Loaded Trucks	0.076	0.027	0.005
Jackhammer	0.035	0.012	0.002
Small Bulldozer	0.003	0.001	0.000

Source: FTA 2006

The most intense vibration from construction activities is generated by blasting and pile driving; however, the proposed project is not expected to involve such activities. Rather, project construction is expected to involve use of dump trucks, skip loaders, rollers, back hoes, concrete pumps, and a crane.

Vibration-Induced Architectural Damage

The threshold at which there is a risk of architectural damage to typical wood-framed buildings is 0.2 in/sec (FTA 2006). Building damage is not normally a factor unless the project requires blasting and/or pile driving (FTA 2006). No blasting, pile driving, or hard rock ripping/crushing activities are anticipated for the proposed project.

The highest PPV shown in Table 7 is 0.210 inches per second for use of a vibratory roller at 25 feet. This is just above the threshold for risk of architectural damage. However, demolition, site preparation, and grading are not expected to involve use of vibratory rollers. The remaining PPV levels in Table 7 are well below the 0.2 PPV threshold for risk of architectural damage at 25 feet.

On-Campus Impacts

While there is a possibility that some equipment used during the demolition, site preparation, and grading phases of the site construction may be within 25 feet of existing, on-campus buildings, effects of these activities cannot be considered as impacts under CEQA (since a project cannot produce impacts onto itself). Nonetheless, these vibration effects would still be a concern regarding potential architectural damage to

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immediately adjacent, on-campus buildings. As such, the following Project Design Features (PDF) would ensure that existing campus buildings would not experience undue vibration-induced damage from nearby project-related construction activities.

PDF-NOI-1: The following procedures to reduce potential vibration damage effects should be implemented during construction, as practical:

- Prior to initiation of construction, District staff should coordinate with the construction contractor to discuss alternative methods of construction for vibration-intense activities in close proximity to existing structures. As part of this coordination, the construction contractor should identify construction methods not involving vibration-intensive equipment or activities. For example, the use of small-sized bulldozers would produce less vibration than using medium or large bulldozers.⁹
- The District or constructor contractor should implement reduced-vibration alternative methods (as identified during project review) when the subsequent excavation, grading, and construction work is conducted in close proximity to existing structures.
- If possible, vibration-intense construction activities should take place during times when nearby sensitive receptors (residences) are at their lowest utilization/occupancy.
- Prior to the initiation of construction, the construction contractor should inspect and report on the current structural condition of the existing buildings within 50 feet from where construction equipment would be used; to the extent feasible.
- During construction, if any vibration levels cause cosmetic or structural damage to existing buildings in close proximity to the project site, the District shall immediately issue “stop-work” orders to the construction contractor to prevent further damage. Work shall not restart until the building is stabilized and/or preventive measures are implemented to relieve further damage to the building(s).

Off-Campus Impacts

The nearest residences to the site of the proposed classroom building are approximately 185 feet away and vibration at the residences would be well below the threshold for risk of damage at this distance. Therefore, off-campus vibration damage impacts would be less than significant and no mitigation measures are necessary.

Vibration Annoyance

The threshold for vibration annoyance at vibration-sensitive uses is 78 VdB (FTA, 2006). Vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames. It

⁹ ‘Small’ bulldozers are taken to be less than 20,000 pounds in operating weight. Typical examples would be Caterpillar D3, D4, or D5 models. ‘Medium’ bulldozers are taken to be between 25,000 and 60,000 pounds in operating weight. Typical examples would be Caterpillar D6 and D7 models. ‘Large’ bulldozers are taken to be greater than 80,000 pounds in operating weight. Typical examples would be Caterpillar D8 through D11 models.

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is typically not perceptible outdoors and impacts are based on the distance to the nearest building (FTA 2006). The effect on buildings near a construction site depends on soil type, ground strata, and receptor building construction. Vibration can range from no perceptible effects at the lowest levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight damage at the highest levels.

On-Campus Impacts

The activities generating the most intense vibration would be demolition, site preparation, and grading. Other construction activities generate much less vibration than these three phases. The project construction activities are planned for the summer of 2016 when the school would not be in session.¹⁰ The District's high school summer school program consists of online courses and there would be negligible students or staff on the school campus during the summer. Therefore, on-campus vibration annoyance effects or disturbances would be less than significant and no mitigation measures are necessary.

Off-Campus Impacts

Since vibration dissipates quickly with distance and the nearest residences are approximately 185 feet from the construction zone, vibration levels would be below the 78 VdB threshold for vibration-induced annoyance. Additionally, construction would take place during the least sensitive hours of the day when less people would be expected to be in the nearby residences. Therefore, off-campus vibration annoyance impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. Project-generated operational noise from people talking near the proposed classroom building would be a less than significant impact, as substantiated in Section 5.12(a), above.

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

Less Than Significant Impact. Project construction would involve demolition of the existing parking area improvements and construction of a new two-story classroom building and associated hardscape and landscape improvements. The entire construction period is estimated to be approximately 10 months long. The noisiest portions, however (i.e., the demolition, site preparation, and grading phases), are expected to take a total of two months and are planned for the summer of 2016. The last day of instruction for the 2015-2016 school year at CUSD schools is Thursday June 9, 2016, and the next school year (2016-17) will start on August 15, 2016. No summer school is offered at San Clemente High School. Construction would occur between 7:00 AM and 4:00 PM, during the less noise-sensitive part of the day and per the City's noise standard.

Construction activities would increase noise levels on and near the proposed area of improvements above existing levels. Construction of the classroom building would involve some earthwork, as site preparation and

¹⁰ The last day of instruction for the 2015-2016 school year at CUSD schools is Thursday June 9, 2016, while the 2016-17 school year will start on August 15, 2016.

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foundation construction would involve grading to greater depths than would have been done for construction of the existing parking lot on the site. However, earthwork on this developed portion of the campus would be somewhat less than earthwork for construction on vacant land – therefore, the construction noise estimate here is conservative. The demolition, site preparation, and grading portions of construction would typically be the noisiest periods of activity, since generally the largest and most powerful equipment is used during these activities. Thereafter, building construction, application of architectural coatings, paving, and landscaping activities typically generate substantially less noise than demolition and grading activities do. Noise produced from construction is commonly held to decrease at a rate of at least 6 decibels (dB) per doubling of distance; conservatively ignoring other attenuation effects from air absorption, ground effects, and/or shielding/scattering effects.¹¹ For example, a dozer that generates 85 dBA at 50 feet would measure 79 dBA at 100 feet, 73 dBA at 200 feet, 67 dBA at 400 feet, and 61 dBA at 800 feet (at –6 dB per doubling). Likewise, construction noise would increase by approximately 6 dB per halving of distance (while the receiver was still in the free-field zone of sound propagation). Composite construction noise (by phase) from industrial development is estimated as 89 dBA L_{eq} when measured at a distance of 50 feet from the construction effort (Bolt Beranek and Newman, 1971).

On-Campus Impacts

The nearest existing, on-campus structure to the site of the proposed classroom building is the gymnasium, approximately 22 feet to the northwest. Gymnasiums are less noise-sensitive than classroom buildings because (a) gymnasium uses – such as athletic activities and assemblies – generate their own internal noise and (b) are not designed or used as primary instructional spaces (which would require suitable interior acoustical characteristics). The nearest existing classroom buildings to the site of the proposed classroom building are two portable buildings approximately 25 feet to the southwest. As such, construction noise at the portable classrooms would be approximately six dB greater than 89 dBA L_{eq} – that is, approximately 95 dBA L_{eq} at the building façade. Assuming a typical exterior-to-interior sound reduction characteristic of 20 to 25 dB (EPA, 1974), the resulting interior levels would be in the range of 70 to 75 dBA L_{eq} . This would be a clearly unacceptable instructional environment per commonly used industry standards (LASUD 2015 and ANSI/ASA 2010).¹²

Portable classrooms have thinner walls – and are therefore more susceptible to exterior noise intrusion – than are classrooms in permanent buildings. As noted above, effects of these project-related construction activities cannot be considered as impacts under CEQA (since a project cannot produce impacts onto itself). Nonetheless, these noise effects would still be a concern regarding potential intrusion, annoyance, and disruption to immediately adjacent, on-campus instructional spaces. Therefore, implementation of the following Project Design Features (PDF) would ensure that existing campus buildings would not experience undue noise effects to learning environments due to nearby project-related construction activities.

¹¹ As sound energy travels outward from the source, spreading loss accounts for a 6 dB decrease in noise level. Soft ground and atmospheric absorption effects can decrease this by an additional 1.5 dB.

¹² For example, the Los Angeles Unified School District requires the analysis of acoustical environments and related building components (such as heating, ventilation, and air conditioning [HVAC]) with the design goal of achieving interior classroom noise levels of less than 55 dBA L_{10} or 45 dBA L_{eq} with maximum (unoccupied) reverberation times of 0.6 seconds. Noise reduction methods needed to attain these goals shall include, but are not limited to, sound walls, building and/or classroom insulation, HVAC modifications, double-paned windows, and other design features (LAUSD 2015).

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PDF-NOI-2: The following procedures to reduce potential noise intrusion effects should be implemented during construction, as practical:

- During the construction of the proposed classroom building, the District shall either:
 - (1) Relocate students to campus facilities that are at least 100 feet from the edge of the construction zone or that do not face the construction site,
- OR
- (2) Erect a temporary noise barrier/curtain between the construction zone and all classrooms. The temporary sound barrier shall have a minimum height of 12 feet and be free of gaps and holes and must achieve a Sound Transmission Class (STC) of 35 or greater. The barrier can be (a) a $\frac{3}{4}$ -inch-thick plywood wall or (b) a hanging blanket/curtain with a surface density of at least 2 pounds per square foot (Thalheimer 2000). For either configuration, the construction side of the barrier shall have an exterior lining of sound absorption material with a Noise Reduction Coefficient (NRC) rating of at least 0.7.

Off-Campus Impacts

The nearest off-campus receptors would be the residential uses that are approximately 185 feet to the southeast of the proposed area of improvements. At this distance, composite construction noise would be reduced to a conservatively estimated level of approximately 77 to 78 dBA Leq (due to distance attenuation alone). Since construction activities would be limited to relatively small equipment (i.e., bulldozers, grading tractors, dump trucks, skip loaders, back hoes, concrete pumps, and a crane), would take place during the least sensitive hours of the day, and would conform to the time-of-day restrictions of the City's Municipal Code, construction noise impacts would be less than significant and no mitigation measures are necessary.

- 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 area to excessive noise levels?**

No Impact. There are no public-use airports within five miles of the project site (AirNav, 2016). Project development would not expose people onsite to excessive airport-related noise levels. Therefore, no impact would occur and no mitigation measures are necessary.

- 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?**

No Impact. There are no heliports or other private air strips within five miles of the project site (AirNav, 2016). Project development would not expose people onsite to excessive heliport- or airstrip-related noise levels. Therefore, no impact would occur and no mitigation measures are necessary.

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5.13 POPULATION AND HOUSING

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

No Impact. The proposed project does not include the development of new homes or businesses and would not extend utilities infrastructure offsite into currently served and unserved areas. The proposed project the construction of a new classroom building and other site improvements to an existing high school campus. No increase in the number of students or staff would occur under the proposed project. The proposed classroom building would be added to alleviate overcrowding at San Clemente High School; it would allow the high school staff to shift students from overcrowded classrooms to the new classrooms, thereby freeing up space in existing classrooms. Therefore, no impact would occur and no mitigation measures are necessary.

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

No Impact. As shown in Figures 3, *Aerial Photograph*, the project site is developed with the campus of San Clemente High School. No housing exists on the project site. Therefore, project development would not displace housing or people. No impact would occur and no mitigation measures are necessary.

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

No Impact. See response to Section 5.13(b), above.

5.14 PUBLIC SERVICES

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

- a) **Fire protection?**

Less than Significant Impact. The Orange County Fire Authority (OCFA) provides fire protection and emergency medical services to the existing school. The closest fire station to the project site is Station 60 at 121 Avenida Victoria in Sn Clemente, approximately one mile to the southeast. Considering the existing firefighting resources available to the school, project impacts on fire protection and emergency services are not expected to occur. Additionally, OCFA would be involved in the proposed project's development review process in order to ensure that the necessary fire prevention and emergency response features are incorporated. All site and building improvements proposed under the project would be subject to review and approval by OCFA.

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Furthermore, the fire water system for the proposed classroom building would be designed to comply with NFPA (National Fire Protection Association) 24, “Standard for the Installation of Private Fire Service Mains and Their Appurtenances” 2013 Edition and with the Orange County Fire Authority Guideline B-10 for Fire Master Plans for public schools; waster system improvements would include new water pipes, gate valves, back flow preventers, fire sprinklers, and fire hydrants.

Therefore, implementation of the proposed project would not substantially increase demands for fire protection or emergency medical services at the school nor require construction of new or expanded fire stations. Impacts would be less than significant and no mitigation measures are necessary.

b) Police protection?

Less Than Significant Impact. The project site is within the service area of the Orange County Sheriff’s Department (OCSD). Sheriff’s patrols in the project region are based from the OCSD station at 100 Avenida Presidio in the San Clemente City Hall. The proposed project, which includes the development of a new classroom building (no increase in student population would occur), is not expected to cause a need for new or expanded police facilities or additional officers. Adequate police service is currently provided to the school campus and would continue to under the proposed project. Additionally, on-campus police (as needed) and security cameras are currently provided around the school. Therefore, impacts would be less than significant and no mitigation measures are necessary.

c) Schools?

No Impact. Demand for schools in an area is usually determined by the area’s population. The proposed project does not include the development of new homes, which lead to an increase in student generation and thereby, the need for additional school facilities. The proposed project would not induce population growth in the area, either directly or indirectly. The proposed project involves a number of improvements in a portion of the lower campus area of the school, including the construction of a new two-story classroom building. Addition of the proposed classroom building would have a favorable impact on school facilities by relieving existing overcrowding at San Clemente High School. Therefore, no impact would occur and no mitigation measures are necessary.

d) Parks?

No Impact. See response to Section 5.15, *Recreation*, below.

e) Other public facilities?

No Impact. Demand for library facilities in an area is usually determined by the area’s population. The proposed project does not include the development of new homes, which lead to an increase in population and thereby, the need for additional library facilities. The proposed project involves a number of improvements in a portion of the lower campus area of the school, including the construction of a new two-story classroom building. The student population of the school would continue to make use of and be served by the existing library on campus. Project development would not require the construction of new or expanded library facilities. Therefore, no impacts would occur and no mitigation measures are necessary.

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5.15 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?**

No Impact. Demand for parks and recreational facilities in an area are usually determined by the area's population. The proposed project does not include the development of new homes, which lead to an increase in population and thereby, the need for additional park and recreation facilities. The proposed project involves a number of improvements in a portion of the lower campus area of the school, including the construction of a new two-story classroom building. The existing student population would continue to make use of and be served by the existing school sports and recreational facilities onsite. No expansion of or modifications to the existing school sports and recreational facilities onsite would occur under the proposed project. Therefore, the proposed project would not increase the use of existing neighborhood and regional parks or other recreational facilities, nor would it require construction of new or expanded parks or recreational facilities. No impacts to park and recreational facilities would occur and no mitigation measures are necessary.

- 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?**

No Impact. See response to Section 5.15(a), above.

5.16 TRANSPORTATION/TRAFFIC

Methodology

Definition of Level of Service

Roadway capacity is generally limited by the ability to move vehicles through intersections. A level of service (LOS) is a standard performance measurement to describe the operating characteristics of a street system in terms of the level of congestion or delay experienced by motorists. Service levels range from A through F, which relate to traffic conditions from best (uncongested, free-flowing conditions) to worst (total breakdown with stop-and-go operation).

Intersection Level of Service

The intersection LOS analysis is based on the traffic volumes observed during the peak hour conditions. The peak hours selected for analysis are the highest volumes that occur in four consecutive 15-minute periods from 7 to 9 AM and from 4 to 6 PM on weekdays.

In conformance with the City's requirements, existing AM and PM peak hour operating conditions for the key signalized study intersections were evaluated using the Intersection Capacity Utilization (ICU) method. The ICU technique is intended for signalized intersection analysis and estimates the volume to capacity (V/C) relationship for an intersection based on the individual V/C ratios for key conflicting traffic movements. The ICU value translates to an LOS estimate. Descriptions of the LOS letter grades for signalized intersections

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and the relationship between the various volume-to-capacity (V/C) ratios are provided in Table 8. To determine the LOS at the study area signalized intersections per the City of San Clemente requirements, the ICU calculations use a lane capacity of 1,600 vehicles per hour (vph) for left turn, thru, and right-turn lanes, and a dual left-turn capacity of 3,200 vph.

Table 8 Intersection LOS Criteria for Signalized Intersections

Level of Service	Description	V/C Ratio
A	Operations with very low delay occurring with favorable progression and/or short cycle length.	0.000–0.600
B	Operations with low delay occurring with good progression and/or short cycle lengths.	0.601–0.700
C	Operations with average delays resulting from fair progression and/or longer cycle lengths. Individual cycle failures begin to appear.	0.701–0.800
D	Operations with longer delays due to a combination of unfavorable progression, long cycle lengths, or high V/C ratios. Many vehicles stop and individual cycle failures are noticeable.	0.801–0.900
E	Operations with high delay values indicating poor progression, long cycle lengths, and high V/C ratios. Individual cycle failures are frequent occurrences. This is considered to be the limit of acceptable delay.	0.901–1.000
F	Operation with delays unacceptable to most drivers occurring due to over saturation, poor progression, or very long cycle lengths.	Over 1.000

Source: City of San Clemente Centennial General Plan, 2014.

Typically, the operations of unsignalized intersections are measured in delays of seconds using the Highway Capacity Methodology (HCM). Per the HCM methodology, the worst-case approach delay was calculated at unsignalized intersections. The level of service corresponds to the delay calculated. Tables 8 and 9 describe the level of service concept and the operating conditions expected under each level of service for signalized and unsignalized intersections. The software Synchro Version 9 was used to determine the LOS at the study area unsignalized intersections.

Table 9 Intersection LOS Criteria for Unsignalized Intersections

LOS	Average Delay per Vehicle (seconds)
A	0 to 10.00
B	10.01 to 15.00
C	15.01 to 25.00
D	25.01 to 35.00
E	35.01 to 50.00
F	50.01 and up

Source: Highway Capacity Manual, Transportation Research Board, 2000.

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Acceptable LOS and Thresholds of Significance

Goal M-1.01 of the City's General Plan, the City has established LOS D as the minimum level of service for its roadway system, except for where LOS E is deemed appropriate to accommodate complete streets facilities. A project would have a significant impact at a study area intersection if it causes the level of service to deteriorate from a satisfactory LOS to an unsatisfactory LOS. If a facility is already operating at unsatisfactory LOS and the project causes an increase in delay, it is considered a significant cumulative impact.

Existing Conditions

Study Roadway System

Avenida Pico along the school campus frontage consists of four southbound lanes and three northbound lanes with a raised median. No on-street parking is permitted. There are sidewalks and "bicycles may use full lane" signs on both sides of the roadway. Avenida Pico north of Interstate 5 (I-5) is classified as a Major Arterial – that is, a six-lane divided highway – in the City's General Plan. Avenida Pico has a diamond interchange with I-5 near the west corner of the school campus. The posted speed limit is 35 miles per hour; and 25 miles per hour (school zone) when children are present.

Avenida Presidio on the school campus frontage consists of two through lanes – one eastbound and one westbound – with a continuous striped two way left turn lane. It becomes a two-lane undivided roadway south of the school campus. There are sidewalks on both sides of the street. No on-street parking is permitted. The posted speed limit is 25 miles per hour in a school zone. Avenida Presidio is classified as a collector in the City's General Plan.

Calle Empalme is a two-lane local street with a posted speed limit of 25 miles per hour. Sidewalks are present on both sides of the street. On-street parking is permitted except for the hours of 7 AM to 1 PM on the first and third Mondays of each month for street sweeping.

Avenida la Cuesta is a two-lane local street with a posted speed limit of 25 miles per hour. The segment of Avenida la Cuesta on the access route to the upper school campus has sidewalks on both sides of the roadway. On-street parking is permitted except for the hours of 7 AM to 1 PM on the first and third Thursdays of each month for street sweeping.

Solano is a two-lane loop driveway with one-way flow-through circulation and one double-row of parking spaces between the two sides of the loop. Solano intersects Avenida la Cuesta twice: the northeasterly of the two intersections is the ingress intersection and the southwesterly the egress intersection. The southwest (three-way) intersection is controlled with all-way stop signs. Parking or stopping curbside is prohibited by red curbs on most of Solano except for part of the northeast side of the egress side of the loop. No parking prohibition for street sweeping is posted on the portion of curb where parking is permitted.

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Study Area Intersections

Based on the proposed project plans and the estimate of trips that would be diverted to the school driveways off Avenida Pico and Avenida Presidio, the following intersections were analyzed to evaluate potential impacts with implementation of the proposed project:

1. I-5 Southbound Ramps at Avenida Pico
2. I-5 Northbound Ramps at Avenida Pico
3. High School at Avenida Pico
4. Triton Way at Avenida Pico
5. Calle Frontera/Avenida Presidio at Avenida Pico
6. Avenida Presidio at Northern Driveway
7. Avenida Presidio at Southern Driveway

Intersections 1 and 2 on the I-5 interchange are under the jurisdiction of Caltrans. The remaining intersections (3 to 7) are under the City of San Clemente jurisdiction. All study intersections except 6 and 7 are signalized.

Campus Access and Parking

The major access to the lower campus is provided from Avenida Pico via two signalized driveways: the High School Driveway is a two-lane driveway used for ingress only, and the Triton Way driveway is a three-lane driveway used for egress. Triton Way at the intersection with Avenida Pico consists of one right-turn-only lane, one left-turn-only lane, and one shared left-right turn lane. These driveways are the major access points to the campus and serve the largest parking lot adjacent to Avenida Pico and the student drop-off loop. In addition, two minor driveways limited to right-in/right-out movements are located at Avenida Pico west of the intersection with Avenida Presidio, these driveways primarily provide access to the parking lot of the administrative buildings in the northwest corner of the campus. The lower campus is also accessed via two driveways off Avenida Presidio that allow for full access.

Access to upper campus is via the Solano loop off Avenida La Cuesta. It can be reached from the north via Avenida Presidio towards Calle Empalme, or from the south via Avenida La Cuesta or Avenida Caballeros. The Solano loop has two lanes that serve a student pick-up/drop-off loop and a parking lot with 27 spaces.

Existing Intersections Operations

Existing Traffic Volumes

Turn movement volumes for weekday AM and PM peak hours for intersections 3 to 7 and for the Solano loop were obtained on December 2, 2015. Traffic counts for intersections 1 and 2 were obtained from the traffic technical report prepared for the City of San Clemente Centennial General Plan (F&P 2013). A reasonableness check was performed to ensure that the traffic flow is conserved and the counts are compatible with recent 2015 counts. The intersection count worksheets are included in Appendix F.

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Existing Conditions Intersection Operations Analysis

The intersection operations analysis results are summarized in Table 10. As shown in this table, all study area signalized intersections currently operate at acceptable LOS during the peak hours. The egress of the southern school driveway (intersection 6) experiences delays considered LOS E, as vehicles attempting to make a left to Avenida Presidion experience delays. Per HCM calculations the 95th percentile queue (the queue length that is not exceeded 95 percent of the time) is 109 feet, which equates to 5 vehicles. It should be noted that this LOS E is for the driveway egress; there are no delays at Avenida Presidio, as the thru movements do not stop. The intersection LOS calculation worksheets for existing conditions are provided in Appendix F.

Table 10 Existing Conditions Intersection Level of Service

Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
		ICU or Delay(s)	LOS	ICU or Delay(s)	LOS
Avenida Pico and I-5 Southbound on/off ramp	Signalized	0.63	B	0.69	B
Avenida Pico and I-5 Northbound on/off ramp	Signalized	0.68	B	0.68	B
Avenida Pico and School Driveway	Signalized	0.47	A	0.37	A
Avenida Pico and Triton Way	Signalized	0.41	A	0.42	A
Avenida Pico and Cle Frontera/Ave Presidio	Signalized	0.58	A	0.67	B
Avenida Presidio and North Driveway	Unsignalized	41.8	E	14.0	B
Avenida Presidio and South Driveway	Unsignalized	17.8	C	12.5	B

Note: LOS calculation worksheets included in Appendix F.

¹ Unsignalized intersections based on the delay at the worst-case approach. Signalized intersections based on v/c.

Existing Transit and Non-Motorized Transportation

The Orange County Transit Authority (OCTA) provides regular transit service in the project area via routes 191 and 193. Currently, the nearest bus stops to the school campus is located adjacent to the school on Avenida Pico just west of the High School Driveway, and on Calle Frontera just north of the intersection with Avenida Pico.

Paved sidewalks are located along all roadways in the project study area. Crosswalks with pedestrian signal heads are located on the west, north and south legs of the intersection of Calle Frontera/Avenida Presidio at Avenida La Pata. A Class II bike lane is located on Avenida Pico east of Trinton Way.

- 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 freeways, pedestrian and bicycle paths, and mass transit?**

Less Than Significant Impact. The proposed project includes the construction of a new two-story classroom building and associated improvements on a portion of the lower campus. The new classroom

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building would allow the high school staff to shift students from classrooms in the upper campus, as well as help alleviate overcrowding in other classrooms on the campus. Since there would be no increase in capacity or enrollment under the proposed project, there would be no net increase in vehicular trips with implementation of the proposed project. However, elimination of the use of the classrooms in the upper campus may result in potential traffic impacts due to a shift of traffic patterns in the vicinity of the school. The existing parking lot and site access on Solano loop and the pedestrian path that links the upper campus to the lower campus would not undergo any changes and remain as is.

Traffic counts were collected at the major school access driveways at the upper and lower campus during the AM and PM peak hours. The traffic counts taken at the Solano loop driveway, which provides access to the upper campus, indicate that in the AM peak hour there are 261 vehicles that egress the driveway. In the PM peak hour only 14 vehicles egressed the driveway, as student pickup occurs around 3:00 PM, prior to the typical peak hour traffic on streets. It is anticipated that a proportion of the vehicle trips related to student drop-off and pick-up at the upper campus would be diverted to the driveways off Avenida Pico and Avenida Presidio, which provide access to the lower campus. To estimate the potential number of vehicle trips that would be diverted from the upper campus to the lower campus, the traffic volumes collected at the campus driveways were reviewed. In addition, the estimate took into account the school attendance boundary, the location of the residential areas in the City, and the circulation network in the study area. It should be noted that the Solano loop, the upper campus parking lot and the pedestrian access would not be removed. For the purpose of this analysis it is anticipated that approximately 80 percent of the vehicle trips would be diverted to the driveways in the lower campus.

Existing Plus Project Traffic Condition

To assess Existing Plus Project traffic condition, existing traffic was combined with project traffic. The intersection operations for the Existing Plus Project traffic condition were calculated and are provided in Table 11.

Table 11 Existing Plus Project Conditions Intersection Level of Service

Intersection	Traffic Control	AM Peak Hour		PM Peak Hour	
		ICU or Delay(s)	LOS	ICU or Delay(s)	LOS
Avenida Pico and I-5 Southbound on/off ramp	Signalized	0.66	B	0.69	B
Avenida Pico and I-5 Northbound on/off ramp	Signalized	0.71	C	0.68	B
Avenida Pico and School Driveway	Signalized	0.49	A	0.37	A
Avenida Pico and Triton Way	Signalized	0.46	A	0.42	A
Avenida Pico and Calle Frontera/Avenida Presidio	Signalized	0.61	B	0.67	B
Avenida Presidio and North Driveway	Unsignalized	85.8	F	14.1	B
Avenida Presidio and South Driveway	Unsignalized	20.6	C	12.7	B

Notes: LOS calculation worksheets included in Appendix F.

¹ Unsignalized intersections based on the delay at the worst-case approach. Signalized intersections based on v/c.

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As shown in Table 11, all study intersections would experience minor additional delays with addition of the proposed project; however, all intersections would continue to operate at acceptable LOS. No impacts at intersections would occur with the proposed project. The greatest increase in utilization (ICU v/c) would occur at the intersections of Avenida Pico and I-5 Southbound Ramps and at Avenida Pico at Calle Frontera/Avenida Presidio, which would experience an increase in v/c of 0.03. All signalized intersections would continue to operate at acceptable LOS with the anticipated traffic redistribution caused by the proposed project.

At the school driveways, the greatest increase in delay would occur at the north driveway exit (intersection 6), where the left bound approach to exit the school campus would experience a delay of 85.8 seconds that results in LOS F. Per HCM calculations, the 95th percentile queue (the queue length that is not exceeded 95 percent of the time) would be 220 feet, which equates to nine vehicles. It should be noted that northbound and southbound thru traffic on Avenida Presidio would not experience any delays as there are no stops on Avenida Presidio. Therefore, all queues and delays would be contained within the school driveways on campus. These delays and queues would be limited during a small period of approximately 15 minutes in the morning during student drop-off. The potential for traffic redistribution caused by the proposed project would not result in substantial delays at intersections or affect traffic levels on public roadways.

As parents may experience increased delays and queues trying to exit the school's northern driveway on Avenida Presidio, they may choose to exit from other driveways on Avenida Pico or the southern driveway on Avenida Presidio. A review of the critical movements and the traffic volumes and capacities at the study intersections indicate that they would be able to accommodate more school traffic utilizing the driveways off Avenida Pico while operating at acceptable LOS. Therefore, impacts at study intersections would be less than significant.

In summary, while there would be a detriment in the operation of the driveways off Avenida Presidio, the proposed project would not cause a substantial detriment in traffic conditions and would not cause a significant impact at intersections in the circulation network. Impacts would be less than significant and no mitigation measures are necessary.

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?

Less Than Significant Impact. As Orange County's Congestion Management Agency, OCTA is responsible for the administration of the Congestion Management Program (CMP). The CMP establishes that the LOS should be LOS E or better for CMP roadways and intersections. Avenida Pico is the only Master Plan of Arterial Highways facility in the project study area. As discussed above, all intersections along Avenida Pico would operate at LOS C or better. Therefore, impacts to CMP facilities would be less than significant and no mitigation measures are necessary.

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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?

No Impact. Project development would not result in a change in air traffic patterns. The nearest public-use airport to the project site is John Wayne Airport, at approximately 18 miles to the northwest. Therefore, no impact would occur and no mitigation measures are necessary.

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

Less Than Significant Impact. Project development would not add incompatible uses to area roadways; the proposed project involves the development of institutional uses within an existing high school campus. Project development would also not result in the addition of dangerous intersections within the campus. Under the proposed project, the realigned fire access lane would be designed as a narrow low-speed internal drive aisle that would be safe for pedestrian crossing, while maintaining an efficient circulation system for vehicles, including emergency vehicles. Therefore, impacts would be less than significant and no mitigation measures are necessary.

e) Result in inadequate emergency access?

No Impact. The proposed project includes realignment of an existing fire lane passing north-south through the southeastern part of the lower campus (see Figure 5, *Lower Campus Site Plan*). Fire access to the proposed classroom building would be from this realigned access lane.

To address fire and emergency access needs, the realigned fire access lane would be designed and constructed in accordance with all applicable OCFA design standards for emergency access (e.g., minimum lane width and turning radius). Development of the proposed project's fire access and circulation improvements would also be required to comply with requirements for fire apparatus access roads, as set forth in Section 503 (Fire Apparatus Access Roads) of the 2013 California Fire Code (California Code of Regulations, Title 24, Part 9). For example, the fire access lane would be designed to meet the minimum width requirements of OCFA to allow the passing of emergency vehicles.

Additionally, OCFA review of emergency access roads on project site plans is required by the Division of the State Architect. All site and building improvements proposed under the project would be subject to review and approval by OCFA. Furthermore, implementation of the proposed project would not require road closures or otherwise impact the functionality of Avenida Pico, Avenida Presidio, or the schools internal circulation system as public safety access routes.

Therefore, project development would not result in inadequate emergency access. No impact would occur and no mitigation measures are necessary.

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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?

No Impact. The proposed project would not displace or interfere with the operation of any transit stop or bicycle or pedestrian facility in the area and would not generate a demand for transit service that would adversely impact alternative travel modes. All improvements under the proposed project would occur internal to the campus, in the southeastern portion of the lower campus; no improvements would occur along Avenida Pico or Avenida Presidio, which are used by and include facilities for pedestrians, cyclists, and public transit. Additionally, staff and students on campus would continue to have uninterrupted access to the pedestrian walkway system on campus, as well as the pedestrian improvements that would be implemented under the proposed project. Therefore, no impacts would occur and no mitigation measures are necessary.

5.17 UTILITIES AND SERVICE SYSTEMS

a) Exceed waste water treatment requirements of the applicable Regional Water Quality Control Board?

Less Than Significant Impact. While the City of San Clemente operates the local wastewater collection system that serves the project site, wastewater generated in the City (including the project site) flows through the local wastewater collection system via regional trunk lines to the City of San Clemente Water Reclamation Plant (SCWRP) at 380 Avenida Pico. The SCWRP is owned and operated by the South Orange County Wastewater Authority (SOCWA), whom is required by federal and state law to meet applicable standards of treatment plant discharge requirements. Specifically, the SOCWA's wastewater treatment system is subject to a National Pollution Discharge Elimination System (NPDES) Permit (No. CA0107417) issued by the San Diego Regional Water Quality Control Board in 2012 under Order No. R9-2012-0012 (SDRWQCB 2012); the NPDES permit regulates the amount and type of pollutants that the system can discharge into receiving waters. SOCWA's wastewater treatment system is operating and would continue to operate subject to state waste discharge requirements and federal NPDES permit requirements, as set forth in the aforementioned permit and order numbers.

Additionally, the proposed project includes the construction of a new two-story building and associated improvements on a portion of the lower campus. The new classroom building would allow the high school staff to shift students from classrooms in the upper campus, as well as help alleviate overcrowding in other classrooms on the campus. Since there would be no increase in capacity or enrollment under the proposed project, there would be no net increase in waste water generation under the proposed project. Therefore, the proposed project would not impede SOCWA's ability to continue to meet its wastewater treatment requirements.

Based on the preceding, impacts on SOCWA's wastewater treatment requirements would be less than significant and no mitigation measures are necessary.

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

Less than Significant Impact. The proposed project includes the construction of a new two-story building and associated improvements on a portion of the lower campus. The new classroom building would allow the high school staff to shift students from classrooms in the upper campus, as well as help alleviate overcrowding in other classrooms on the campus. The current student and staff population of the campus would remain as is upon completion of the proposed classroom building; no increases in the student or staff population would occur under the proposed project. Since there would be no increase in capacity or enrollment under the proposed project, there would be no net increase in water or waste water generation under the proposed project. Therefore, project-related impacts on water or waste water treatment facilities would be less than significant and no mitigation measures are necessary.

- c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?**

Less than Significant Impact. Project implementation would not substantially change the drainage pattern onsite, as runoff would continue to be conveyed offsite in the same manner, via the existing onsite drainage improvements. Improvements under the proposed project would also not result in an increase of the amount of impervious surfaces over existing conditions and therefore, is not anticipated to increase the rate or amount of runoff in comparison to existing conditions. The proposed project would include installation of a storm drain from the edge of the new classroom building to a storm drain connection on the school's property line. The proposed storm drain would be within the project site footprint and would connect to the existing storm drain system onsite. Additionally, the project site and surrounding area have already been planned and engineered to accommodate storm water runoff. Therefore, project development would not require or result in the construction of new storm water drainage facilities or expansion of existing facilities. Impacts would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. As noted above, the current student and staff population of the campus would remain as is upon completion of the proposed classroom building; no increases in the student or staff population would occur under the proposed project. Since there would be no increase in capacity or enrollment under the proposed project, there would be no net increase in water generation under the proposed project.

Additionally, the water supply needs for the new classroom building are not considered substantial since the improvements that would occur under the proposed project would be consistent with the City's General Plan land use plan; specifically, the land use(s) planned and envisioned for the project site under the General Plan. The City's General Plan forms the basis for the City of San Clemente for evaluating its service area's future water demands as a part of the City's 2010 Urban Water Management Plan (UWMP) and subsequent updates.

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Additionally, per its 2010 UWMP, the City's Utility Division forecasts that it has adequate water supplies to meet demands in its service area through the 2015–2035 period in both normal and multiple dry years (see Table's 3-1, 3-2 and 3-3 of the 2010 UWMP; Malcolm Pirnie 2011). Based on the preceding, the City's water supplies are expected to be adequate to meet all City demands, including those of the improvements that would be accommodated under the proposed project, and the proposed project would not require the City to obtain new or expanded water supplies.

Furthermore, following Governor Brown's recently declared State of Emergency, the Governor issued the fourth in a series of Executive Orders on actions necessary to address California's severe drought conditions, which directed the State Water Resource Control Board (SWRCB) to implement mandatory water reductions in urban areas to reduce potable urban water usage by 25 percent statewide. On May 5, 2015, the State Water Board adopted an emergency conservation regulation in accordance with the Governor's directive. The provisions of the emergency regulation went into effect on May 18, 2015.

Per the emergency regulation, San Clemente is required to reduce water use by 24 percent from water usage in 2013. The 24 percent reduction requirement became effective June 1, 2015, and is calculated by comparing current water consumption to the water use for the same month in 2013. In response to these recent actions and in order to help the City meet its water reduction percentage and help reduce daily water use, a number of mandatory restrictions have gone into effect in the City. Following is a summary of some of the mandatory water conservation measures that are in effect City-wide and applicable to San Clemente High School:

- Outdoor watering is prohibited between 9am and 6pm.
- Overspray and runoff is prohibited.
- All plumbing and irrigation leaks are required to be fixed immediately.
- No washing of paved surfaces and structures including buildings with potable water.

The mandatory water restrictions set by the City help San Clemente achieve its required water reduction target of 24 percent. Through implementation of these mandatory water restrictions, for the period of May to August 2015 (compared to 2013 usage), San Clemente's total water reduction was at approximately 27 percent (City of San Clemente 2016). Therefore, the City is currently meeting its water reduction target of 24 percent. The District would be required to comply with all applicable mandatory water restrictions and thereby, help the City continue to meet its water reduction target.

Furthermore, as noted in Section 3.1.6, *Sustainability*, the proposed project would be designed to include a number of high performance design strategies/elements (which would in turn help reduce water usage), including the use of drought tolerant and native species of plants and trees; high efficiency irrigation technology; and low water use plumbing fixtures.

Finally, development of the new classroom building under the proposed project would be required to comply with the provisions of the most current California Green Building Standards Code (CALGreen), which contains requirements for indoor water use reduction and site irrigation conservation.

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Therefore, project-related impacts on water supplies would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. See response to Section 5.17(b), above.

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

Less Than Significant Impact. Following is a discussion of the potential impacts on landfill capacity as a result of the construction and operational phases of the proposed project.

Construction-Related Solid Waste Generation

Development of the proposed project would involve the demolition of existing parking areas and drive aisles and other site improvements, and removal of a number of ornamental trees (site features and improvements to be demolished or removed are shown in Figures 3, *Aerial Photograph*, and 4, *Site Photographs*). The proposed project's construction and demolition activities would result in a temporary generation of solid waste.

However, there is adequate landfill capacity in the region to serve the proposed project's construction-related solid waste needs, and project construction activities would not require additional landfill capacity. Solid waste generated during the proposed project's construction phase would also be temporary, and would cease upon completion of the construction phase.

Additionally, development of the proposed project would be required to comply with the provisions of the most current California Green Building Standards Code (CALGreen), which outlines requirements for construction waste reduction, material selection, and natural resource conservation.

Therefore, no significant construction-related impacts on landfill capacity would occur and no mitigation measures are necessary.

Operational-Related Solid Waste Generation

As noted above, the current student and staff population of the campus would remain as is upon completion of the proposed classroom building; no increases in the student or staff population would occur under the proposed project. Since there would be no increase in capacity or enrollment under the proposed project, there would be no net increase in solid waste generation under the proposed project. Therefore, no significant operational-related impacts on landfill capacity would occur and no mitigation measures are necessary.

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

No Impact. The following federal and state laws and regulations govern solid waste disposal. The EPA administers the Resource Conservation and Recovery Act of 1976 and the Solid Waste Disposal Act of 1965,

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which govern solid waste disposal. In the State of California, Assembly Bill 939 (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.) required every California city and county to divert 50 percent of its waste from landfills by the year 2000 by such means as recycling, source reduction, and composting. In addition, AB 939 requires each county to prepare a countywide siting element specifying areas for transformation or disposal sites to provide capacity for solid waste generated in the county that cannot be reduced or recycled for a 15-year period. AB 1327, the California Solid Waste Reuse and Recycling Access Act of 1991, requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

Compliance with AB 939 is measured in part by actual disposal rates compared to target disposal rates; actual rates at or below target rates are consistent with AB 939. Actual disposal rates for the City of San Clemente in 2014, the latest year for which data is available, were 3.7 pounds per day (ppd) per resident and 12.2 ppd per employee; target disposal rates were 7.1 ppd per resident and 25.9 ppd per employee (CalRecycle 2016). Therefore, disposal rates in the City in 2014 were consistent with AB 939.

The proposed project would be required to comply with all applicable laws and regulations governing solid waste, including those listed above, and in doing so, not affect the City's ability to continue to meet the required AB 939 waste diversion requirements. Therefore, impacts related to solid waste statutes and regulations would not occur and no mitigation measures are necessary.

5.18 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?**

Less Than Significant Impact. The project site is currently developed and disturbed; it houses the campus of San Clemente High School (see Figure 3, *Aerial Photograph*). Onsite vegetation includes a number of ornamental trees, shrubs and groundcover throughout the campus. The project site does not contain any sensitive natural resources that could be disturbed as a result of project development. As demonstrated in Section 5.4, *Biological Resources*, the proposed project would not result in the reduction of the habitat of fish or wildlife species; cause a fish or wildlife population to drop below self-sustaining levels; threaten to eliminate a plant or animal community; or reduce the number or restrict the range of a rare or endangered plant or animal. Impacts to nesting habitat for migratory birds would be reduced to a less than significant with compliance of the MBTA. Additionally, as demonstrated in Section 5.5, *Cultural Resources*, no historic resources were identified onsite, and therefore the project does not have the potential to eliminate important examples of California history or prehistory. Therefore, impacts would be less than significant.

- 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**

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when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. The proposed project involves the introduction of a new classroom building and other site improvements on the existing campus of San Clemente High School. The proposed improvements would be consistent with those permitted under the General Plan and zoning designations of the project site and with those existing onsite. Therefore, the proposed project would not weight short-term goals above long-term environmental goals of the City. The issues relevant to the proposed project are also very localized and confined to the immediate project area. Additionally, the proposed project is located in an urbanized area of the City where supporting utility infrastructure (e.g., water, wastewater, and drainage) and services (e.g., solid waste collection) currently exists. Furthermore, the proposed project is generally too small in scope to appreciably contribute to existing cumulative impacts, and is located in such an area where little new development is occurring that may combine cumulatively. In consideration of the preceding factors, the proposed project's contribution to cumulative impacts would be rendered less than significant; therefore, project impacts would not be cumulatively considerable.

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

Less Than Significant Impact with Mitigation. As discussed in the respective topical sections of this Initial Study, implementation of the proposed project would result in potentially significant impacts in the area of air quality, which may cause adverse effects on human beings. However, feasible mitigation measures have been identified to reduce these impacts to less than significant levels. Therefore, the proposed project would have no substantial adverse effects on human beings.

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Appendix A Air Quality and Greenhouse Gas Emission Background and Modeling Data

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Appendix B Phase I Cultural Resources Investigation

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Appendix C Geotechnical Investigation

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Appendix D Geologic and Environmental Hazards Assessment Report

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Appendix E Phase I Environmental Site Assessment

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Appendix F Traffic Counts and Intersection Calculation Worksheets

Appendices

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