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2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This draft supplemental environmental impact report (DSEIR) has been prepared to satisfy CEQA, as amended (Public Resources Code, Section 21000 et seq.) and the CEQA Guidelines, as amended (California Code of Regulations, Section 15000 et seq.).

The lead agency means “the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment” (CEQA Section 21067). The Poway Unified School District (District) has the principal responsibility for approval of the proposed project. For this reason, the Poway Unified School District is the CEQA lead agency for this project.

The environmental impact report (EIR) is the public document designed to provide decision makers and the public with an analysis of the environmental effects of the proposed project, to indicate possible ways to reduce or avoid environmental damage and to identify alternatives to the project.

The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of all past, present, and reasonably foreseeable future projects.

2.2 CERTIFIED ENVIRONMENTAL DOCUMENT

On June 26, 2006, the District’s Board of Education certified the Final Environmental Impact (State Clearinghouse No. 2006021013) for the Del Norte High School (2006 EIR). The 2006 EIR analyzed the potential environmental impacts of the development of the 62-acre Del Norte High School (approved project). The development included a comprehensive high school providing a range of facilities and services on the school campus to house approximately 2,150 students in grades 9 through 12. Facilities constructed as part of the high school included instructional and recreational facilities, food service/kitchen, storage, administrative facilities, and custodial space. Recreational facilities included two soccer fields, two softball fields, two baseball diamonds, a football practice field, a football/track-and-field area with a 3,780-seat stadium, a gymnasium, hard courts for basketball, tennis courts, and a pool. Del Norte High School opened in 2009. On May 14, 2020, the District approved an Addendum to the 2006 EIR to add six classrooms and a restroom building and replace three existing natural grass sports fields with artificial turf, salt-tolerant grass, or a combination of the two; install field lighting, place new portable bleachers for up to 200 spectators on the fields; and make other minor improvements associated with providing infrastructure supporting the classroom expansion, restroom building, and access to the lit fields from the existing parking lot. The

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2006 EIR and the 2020 Addendum are collectively referred to as “Certified EIR,” and the project analyzed in the Certified EIR is called “approved project” in this SEIR.

2.3 CEQA REQUIREMENTS

CEQA Guidelines Section 15162 states that when an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, that one or more of the following conditions are met:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or negative declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects;
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
 - (A) The project will have one or more significant effects not discussed in the previous EIR or negative declaration;
 - (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;
 - (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or
 - (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.

Preparation of an Addendum to an EIR is appropriate when none of the conditions specified in Section 15162 (above) are present and some minor technical changes to the previously certified EIR are necessary. The lead agency determined that, pursuant to Section 15162, the proposed project would result in new information of substantial importance that was not known and could not have been known with the exercise of reasonable diligence at the time the previous EIR was certified; therefore, the lead agency determined that one of the conditions specified in Section 15162 is met.

A supplement to an EIR (supplemental EIR) is narrower in scope than a subsequent EIR. Pursuant to CEQA Guidelines Section 15163(a), the lead agency may choose to prepare a supplement to an EIR rather than a subsequent EIR if the following conditions are met:

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- (1) Any of the conditions described in Section 15162 would require the preparation of a subsequent EIR, and
- (2) Only minor additions or changes would be necessary to make the previous EIR adequately apply to the project in the changed situation.

CEQA Guidelines Section 15163 lists requirements for the supplement to an EIR:

- (b) The supplement to the EIR need contain only the information necessary to make the previous EIR adequate for the project as revised.
- (c) A supplement to an EIR shall be given the same kind of notice and public review as is given to a draft EIR under Section 15087.
- (d) A supplement to an EIR may be circulated by itself without recirculating the previous draft or final EIR.
- (e) When the agency decides whether to approve the project, the decision-making body shall consider the previous EIR as revised by the supplemental EIR. A finding under Section 15091 shall be made for each significant effect shown in the previous EIR as revised.

The District determined that the preparation of a supplemental EIR would be adequate because although the proposed project, as described in Chapter 3, *Project Description*, would only provide sports lighting to the existing varsity baseball and softball fields, the proximity to residential uses to the east could increase the severity of the light and glare impacts compared to those analyzed in the Certified EIR. The proposed project would not change the existing programming demands of the students and the community and would not result in an increased number of events, participants, or spectators. The Certified EIR analyzed the impacts of lighting various recreational/athletic facilities on the high school campus, and the proposed project would represent minor changes to the existing high school operation.

The intent of the Supplemental EIR is to provide sufficient information on the potential environmental impacts of the proposed project to allow the District's Board of Education to make an informed decision regarding approval of the project. Specific discretionary actions to be reviewed by the District are described in Section 3.4, *Intended Uses of the EIR*.

The overall purpose of this DSEIR is to inform the lead agency, responsible agencies, decision-makers, and the general public about the environmental effects of the development and operation of the proposed project.

2.4 NOTICE OF PREPARATION

The District determined that a Supplemental EIR would be required for this project and issued a Notice of Preparation (NOP) on February 24, 2022. Only one comment was received during the public review period from February 24 to March 25, 2022. A scoping meeting was conducted virtually on March 14, 2022. However, no members of the public or agency representatives attended the scoping meeting, and no comments were received. The NOP and the NOP comment letter are included in Appendix A.

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2.5 SCOPE OF THIS DEIR

At the time of NOP issuance on February 24, 2022, the District anticipated that the proposed field lighting project could result in potentially significant impacts related to light and glare, air quality, greenhouse gas (GHG) emissions, noise, and transportation. However, the proposed project as described in Chapter 3, *Project Description*, which establishes the baseline for analyzing future, project-related environmental impacts, the scope of this DSEIR is limited to the following four environmental topic areas:

- Aesthetics (light and glare)
- Air Quality
- Noise
- Transportation

Other topics from the CEQA Guidelines Appendix G checklist were determined to have no impact or less than significant impact, and the Certified EIR provided adequate analysis. The Certified EIR provided environmental analysis for the development of a comprehensive high school with various athletic facilities, including some with nighttime sports lighting. The following provides a brief explanation of why the other effects would not be potentially significant.

- **Agricultural and Forestry Resources:** The project site is developed with varsity baseball and softball fields as part of the existing Del Norte High School. No agricultural and forestry resources would be impacted.
- **Biological Resources:** The project site is developed with varsity baseball and softball fields as part of the existing Del Norte High School. The light poles would be installed on the already disturbed area of the developed high school campus. The proposed project would not disturb any sensitive native habitats or special status species. The proposed project would not result in greater biological resources impacts than discussed in the Certified EIR.
- **Cultural Resources:** The area to be disturbed by the proposed project is developed with paved surfaces and natural grass ballfields within the boundaries of the Del Norte High School. The Certified EIR did not identify any evidence of historic or archaeological resources on the Del Norte High School campus. The proposed project would not result in greater cultural resources impacts than discussed in the Certified EIR.
- **Energy:** In November 2018, the Natural Resources Agency finalized the updates to the CEQA Guidelines, the Office of Administrative Law approved them, and the changes were filed with the Secretary of State in December 2018. The updated CEQA Guidelines became effective on December 28, 2018. Prior to the CEQA Guidelines Update, the Energy Section was not included in Appendix G of the CEQA Guidelines; therefore, energy was not analyzed in the Certified EIR. The proposed project would not result in new sports programs or community events or an increase in students and staff to generate a substantial increase in energy demands. Although electricity would be used to operate the 14 LED light

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poles, the lights would be programmed to be turned on and off at specific times so that no wasteful, inefficient, or unnecessary consumption of energy resources would occur.

- **Geology and Soils:** The proposed project would be installed in compliance with the seismic and safety requirements of the California Building Code and standards of the California State Architect (DSA) and California Department of Education (CDE).
- **Greenhouse Gas Emissions:** The Certified EIR did not analyze GHG emissions because it was certified prior to the adoption of Assembly Bill 32 (AB 32) and the Senate Bill 97 (SB 97) amendments to the CEQA Guidelines (adopted December 30, 2009, effective March 18, 2010). The proposed project would generate GHG emissions from the equipment operation of the light poles and from the mobile sources by the users of the ballfields. However, because the proposed project would only shift the field use hours to up to four hours later and would not increase the number of events or participants and spectators, there would be no increase in trips related to the proposed project, and the associated VMT would also be the same as the existing conditions. The greatest contributor to GHG emissions is mobile sources. The proposed project would not generate additional trips during operation, and therefore would not result in a substantial increase in GHG emissions compared to the existing conditions.
- **Hazards and Hazardous Materials:** The proposed project would occur within the boundaries of the Del Norte High School and would support the existing high school operation. No hazardous materials would be used or stored during the evening use of the ballfields.
- **Hydrology and Water Quality:** The proposed project would occur within the boundaries of the Del Norte High School, and the installation of 14 light poles would not change the drainage pattern or stormwater volume within the existing campus. Construction impacts would be temporary and cease upon completion of the project construction.
- **Land Use and Planning:** The proposed project is consistent with the existing high school operation and would not change the uses of the existing ballfields.
- **Mineral Resources:** The proposed project would occur within the boundaries of the Del Norte High School. The Certified EIR did not identify any mineral resources within the project site.
- **Population and Housing:** The proposed project would serve and support the existing high school's academic and athletic program needs and athletic teams. Therefore, the proposed project is not a growth-inducing project that could have any direct or indirect impacts on population and housing.
- **Public Services:** The proposed project is part of the existing high school operation and would not increase the use of the ballfields. The proposed project would continue to support the existing school programs and students. Therefore, the proposed project would not result in increased demands for fire, police, school, and parks services.
- **Recreation:** The proposed project would accommodate the existing school programs and students already served by the existing ballfields. Implementation of the proposed project would not increase the

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number of people served by the existing parks or other recreational facilities or displace existing recreational facilities so that the use of other parks or recreational facilities would be increased.

- **Tribal Cultural Resources:** AB 52 requires Native American tribes to submit a written request to the District to be notified of projects within their traditionally and culturally affiliated area. To tribes who provide the written request pursuant to AB 52, the District must provide written, formal notification within 14 days of deciding to undertake a project. The tribe must respond to the District within 30 days of receiving this notification if they want to engage in consultation on the project, and the District must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes when 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource; 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached; or 3) a tribe does not engage in the consultation process or provide comments. The District did not receive any written notification from a tribe. Therefore, no notification for consultation was sent, and no consultation was conducted.

The proposed project would be installed on the existing ballfields at Del Norte High School. The Certified EIR did not identify any resources listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources, as defined in Public Resources Code (PRC) Section 5020.1(k). The project site also does not contain any historical resources pursuant to PRC subsection 5024.1(c). Furthermore, the construction equipment for the installation of light poles typically includes a crane, backhoe, concrete saw/jackhammer, and a drill rig. The construction involves drilling at each pole location and setting the concrete base for the pole, therefore, no grading or excavation activities with the potential for discovery of tribal cultural resources would occur.

The Native American Heritage Commission responded to the NOP in its letter dated February 24, 2022. This response letter is included in Appendix A to this DSEIR. The letter provided a protocol for evaluation of cultural and historic resources and the tribal consultation requirements under AB 52 and SB 18. As stated above, no tribe has submitted a notification request pursuant to AB 52. And the proposed project is not subject to SB 18, since it does not involve the adoption of or amendment to a general plan or a specific plan.

- **Utilities and Service Systems:** The proposed project would occur within the existing high school campus and connect to the existing on-site utility connections.
- **Wildlife:** The project site is in a Very High Fire Hazard Severity Zone of the local responsibility area (CAL FIRE 2019). However, the proposed project would light the existing ballfields at Del Norte High School and would not impact the existing wildfire conditions.

Pursuant to the CEQA Guidelines Section 15163(b), a supplemental EIR only needs to contain the information necessary to make the previous EIR adequate for the project as revised. Therefore, only those sections that could potentially result in substantial changes to the analysis in the Certified EIR are included in this SEIR. The proposed installation of sports lighting to the existing varsity baseball and softball fields would require minor additions to make the Certified EIR adequately apply to the changed circumstances.

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2.5.1 Impacts Considered Less Than Significant

As discussed in Section 2.5, the District determined that 16 environmental impact categories were not significantly affected by or did not affect the proposed project. These categories are not discussed in detail in this DSEIR.

- Agricultural and Forestry Resources
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Mineral Resources
- Population and Housing
- Public Services
- Recreation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildlife

2.5.2 Potentially Significant Adverse Impacts

The District determined that four environmental factors could have potentially significant impacts if the proposed project is implemented.

- Aesthetics
- Air Quality
- Noise
- Transportation

2.5.3 Unavoidable Significant Adverse Impacts

This DSEIR did not identify any significant and unavoidable adverse impacts, as defined by CEQA, that would result from implementation of the proposed project.

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2.6 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this DSEIR, consistent with Section 15150 of the CEQA Guidelines, and they are available for review at the Poway Unified School District, 15250 Avenue of Science, San Diego, CA 92128.

- **Del Norte High School Draft EIR**, April 10, 2006. The Poway Unified School District, as lead agency, prepared this EIR for the development of the Del Norte High School on a 64-acre site at the northwest corner of Camino San Bernardo and Deer Ridge Road in the City of San Diego and the unincorporated San Diego County. At the time of EIR preparation, the site was an undeveloped broad hilltop and agricultural land that sloped gently toward the south and east, surrounded by two master planned communities. Residences existed on the east side, but areas to the west were undeveloped, with approved plans to accommodate residential and neighborhood commercial uses. The EIR evaluated the development and operation of a comprehensive high school serving approximately 2,150 students in grades 9 through 12. The EIR found that construction and operational air quality and the construction and operational noise impacts were significant and unavoidable.
- **Del Norte High School Classroom Expansion and Sports Fields Lighting Project EIR Addendum**, May 2020. The Poway Unified School District, as lead agency, prepared an Addendum for the addition of six classrooms and a restroom building to the existing high school campus and replacement of three existing natural grass sports fields with artificial turf, salt-tolerant grass or a combination of the two, installation of field lighting, placement of new portable bleachers for up to 200 spectators on the fields, and other minor improvements associated with providing infrastructure supporting the classroom expansion, restroom building, and access to the lit fields from the existing parking lot. The Addendum concluded that there are no new or more severe significant impact compared to the impacts of the Approved Project disclosed in the 2006 Certified EIR.

2.7 FINAL SEIR CERTIFICATION

This DSEIR is being circulated for public review for 45 days. Interested agencies and members of the public are invited to provide written comments on the DEIR to the District address shown on the title page of this document. Upon completion of the 45-day review period, the District will review all written comments received and prepare written responses for each. A Final SEIR will incorporate the received comments, responses to the comments, and any changes to the DSEIR that result from comments. The Final SEIR will be presented to the Board of Education for potential certification as the environmental document for the project. All persons who comment on the DSEIR will be notified of the availability of the Final SEIR and the date of the board meeting.

The DSEIR is available to the general public for review at the following locations:

- Poway Unified School District, 15250 Avenue of Science, San Diego, CA 92128

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2.8 MITIGATION MONITORING

PRC Section 21081.6 requires that agencies adopt a monitoring or reporting program for any project for which it has made findings pursuant to PRC Section 21081. Such a program is intended to ensure the implementation of all mitigation measures adopted through the preparation of an EIR.

The Mitigation Monitoring Program for the proposed project will be completed as part of the Final SEIR, prior to consideration of the proposed project by the Board of Education.

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