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6 Attorneys for Petitioner
7 SAVE THE FIELD

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF SAN DIEGO

10 SAVE THE FIELD, a California nonprofit public
benefit corporation,

11 Petitioner,

12 v.

13 DEL MAR UNION SCHOOL DISTRICT, and
14 DOES 1 through 10, inclusive,

15 Respondent.

Case No. 37-2020-00020207-CU-TT-CTL

**SAVE THE FIELD'S NOTICE OF
LODGMET OF EXCERPTS OF
ADMINISTRATIVE RECORD
PAGES CITED IN SUPPORT OF
PETITION FOR WRIT OF
MANDATE**

Date: November 18, 2020

Time: 1:30 p.m.

Dept: C-73

Judge: Hon. Joel R. Wohlfeil

Complaint Filed: June 12, 2020

ELECTRONICALLY FILED

Superior Court of California,
County of San Diego

11/06/2020 at 08:38:00 PM

Clerk of the Superior Court
By Adriana Ive Anzalone, Deputy Clerk

Petitioner Save the Field (“Save the Field”) respectfully lodges the following excerpts of the Administrative Record cited in support of Save the Field’s Petition for Writ of Mandate (the “Petition”).

TAB NO.	ADMIN. RECORD VOLUME/TAB	ADMIN. RECORD PAGE(S)	DESCRIPTION
1.	Vol. I, Tab 1	AR00001	Notice of Determination
2.	Vol. I, Tab 2	AR00010-00011	Notice of Intent (NOI) to Adopt a Mitigated Negative Declaration for the Del mar Heights School Rebuild Project
3.	Vol. I, Tab 5	AR00023-00024	Initial Study/Mitigated Negative Declaration (Introduction, pp. 1-2)
4.	Vol. I, Tab 5	AR00029	Figure 3 – Local Vicinity
5.	Vol. I, Tab 5	AR00037-00042	Initial Study/Mitigated Negative Declaration (Introduction, pp. 15-20)
6.	Vol. I, Tab 5	AR00043	Figure 5 – Site Plan
7.	Vol. I, Tab 5	AR00075-00076	Initial Study/Mitigated Negative Declaration (Biological Resources, pp. 53-54)
8.	Vol. I, Tab 5	AR00103-00117	Initial Study/Mitigated Negative Declaration (Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation and Transportation, pp. 81-95)
9.	Vol. I, Tab 5	AR00143-00144	Initial Study/Mitigated Negative Declaration (Wildfire, pp. 121-122)
10.	Vol. IV, Tab 1(b)	AR02273	San Diego CEQA Significance Determination Thresholds, Temporary Construction Noise (p. 54)
11.	Vol. V, Tab 1(c)	AR03106	San Diego CEQA Significance Determination Thresholds, Temporary Construction Noise (p. 54)
12.	Vol. V, Tab 1(g)	AR03275-03276	Torrey Pines Community Plan (Executive Summary, pp. 3-4)
13.	Vol. V, Tab 1(g)	AR03289-03290	Torrey Pines Community Plan (Planning Context – Local Coastal Program Description, pp. 17-18)

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TAB NO.	ADMIN. RECORD VOLUME/TAB	ADMIN. RECORD PAGE(S)	DESCRIPTION
14.	Vol. V, Tab 1(g)	AR3302-03304	Torrey Pines Community Plan (Resource Management & Open Space Element Policies, pp. 27-29)
15.	Vol. V, Tab 1(g)	AR03320	Torrey Pines Community Plan (Transportation Element Policies, p. 45)
16.	Vol. V, Tab 1(g)	AR03337	Torrey Pines Community Plan (Residential Element Policies, p. 62)
17.	Vol. V, Tab 1(g)	AR03364	Torrey Pines Community Plan (Community Facilities Element, p. 89)
18.	Vol. V, Tab 1(g)	AR03369-03370	Torrey Pines Community Plan Community Facilities Element Policies, pp. 94-95)
19.	Vol. V, Tab 1(g)	AR03377	Torrey Pines Community Plan (Relationship to the General Plan, Recreation, p. 102)
20.	Vol. V, Tab 1(g)	AR03393	Torrey Pines Community Plan (Local Coastal Program Policies – Visual Resources, p. 118)
21.	Vol. VI, Tab 1	AR03476	Response to Comments (Recreation/Green Space, p. 2-47)
22.	Vol. VI, Tab 1	AR03490-03491	Response to Comments (Wildfire, pp. 2-61 – 2-62)
23.	Vol. VI, Tab 1	AR03504-03509	Sierra Club North County Coastal Group Comments on Mitigated Negative Declaration for the Del Mar Heights School Rebuild Project
24.	Vol. VI, Tab 1	AR03571-03571	Play Outside Del Mar Comments on Mitigated Negative Declaration for Del Mar Heights School (pp. 22-24)
25.	Vol. VI, Tab 1	AR03616	Email from Judith Verbanets
26.	Vol. VI, Tab 1	AR03658-03660	California Department of Parks and Recreation Comments on Initial Study/Mitigated Negative Declaration for Del Mar Heights Elementary School Rebuild Project

TAB NO.	ADMIN. RECORD VOLUME/TAB	ADMIN. RECORD PAGE(S)	DESCRIPTION
27.	Vol. VI, Tab 1	AR03727-03735	RK Engineering Group, Inc. Del Mar Heights School Rebuild Project Initial Study/Mitigated Negative Declaration (IS/MND) Air Quality, Noise and Transportation Review
28.	Vol. VI, Tab 1	AR03745	Response to Comments Table 16, Project Consistency with Torrey Pines Community Plan Key Policies
29.	Vol. VI, Tab 1	AR03876-03879	Baker Nowicki Design Studio Meeting Minutes – DSA Pre Application Meeting dated February 24, 2020
30.	Vol. VI, Tab 1	AR03880	Del Mar Heights School Rebuild Increment 1 Design Plans dated February 11, 2020 (Cover Page)
31.	Vol. VI, Tab 1	AR03908-03927	RK Engineering Group, Inc. Statement of Qualifications
32.	Vol. VIII, Tab 1(I)	AR04780	Del Mar Union School District Notice of Completion & Environmental Document Transmittal
33.	Vol. IX, Tab 1	AR4825-4833	Full Text of Measure MM
34.	Vol. IX, Tab 3	AR4836-4838	Letter from Procopio to Del Mar Union School District Board of Trustees on behalf of Save the Field, dated April 28, 2020
35.	Vol. IX, Tab 4	AR4848-4854	Measure MM Cumulative Project Expenditures as of March 31, 2020

DATED: November 6, 2020

PROCOPIO, CORY, HARGREAVES & SAVITCH LLP

By:



Rebecca L. Reed
Justin M. Fontaine
Attorneys for Petitioner
SAVE THE FIELD

1 **PROOF OF SERVICE**

2 I am a resident of the State of California, over the age of eighteen years, and not a party to
3 the within action. My business address is PROCOPIO, CORY, HARGREAVES & SAVITCH
4 LLP, 525 "B" Street, Suite 2200, San Diego, California 92101. On November 6, 2020, I served
5 the within documents:

6 **SAVE THE FIELD'S NOTICE OF LODGMENT OF EXCERPTS OF ADMINISTRATIVE
7 RECORD PAGES CITED IN SUPPORT OF PETITION FOR WRIT OF MANDATE**

- 8 **BY FACSIMILE** by transmitting via facsimile number (619) 235-0398 the document(s) listed
9 above to the fax number(s) set forth below on this date before 5:00 p.m. A copy of the
10 transmission confirmation report is attached hereto.
- 11 **BY U.S. MAIL** by placing the document(s) listed above in a sealed envelope with postage
12 thereon fully prepaid, in the United States mail at San Diego, California addressed as set forth
13 below. I am readily familiar with the firm's practice of collection and processing
14 correspondence for mailing. Under that practice it would be deposited with the U.S. Postal
15 Service on the same day with postage thereon fully prepaid in the ordinary course of business.
16 I am aware that on motion of the party served, service is presumed invalid if postal
17 cancellation date or postage meter date is more than one day after date of deposit for mailing
18 an affidavit.
- 19 **BY OVERNIGHT DELIVERY** by placing the document(s) listed above in a sealed overnight
20 envelope and depositing it for overnight delivery at San Diego, California, addressed as set forth
21 below. I am readily familiar with the practice of this firm for collection and processing of
22 correspondence for processing by overnight mail. Pursuant to this practice, correspondence
23 would be deposited in the overnight box located at 530 "B" Street, San Diego, California 92101
24 in the ordinary course of business on the date of this declaration.
- 25 **BY E-MAIL OR ELECTRONIC SERVICE (via One Legal Online Court Services):** I
26 served upon the designated recipients via electronic transmission through the One Legal system
27 on November 6, 2020. Upon completion of said transmission of said documents, a certified
28 receipt is issued to filing party acknowledging receipt by One Legal's system. Once One Legal
has served all designated recipients, proof of electronic service is returned to the filing party.

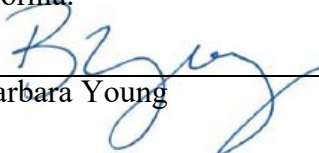
19 Wendy H. Wiles, Esq.
20 Jeffrey W. Frey, Esq.
21 ATKINSON, ANDELSON, LOYA,
22 RUUD & ROMO
23 20 Pacifica, Suite 1100
24 Irvine, CA 92618

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(cc: Irene.dehart@aalrr.com)

Attorneys for Respondent,
Del Mar Union School District

24 (State) I declare under penalty of perjury under the laws of the State of California that the
above is true and correct.

25 Executed on November 6, 2020, at San Diego, California.

26 
27 _____
28 Barbara Young