Grossmont High School Bus Maintenance Facility Project Notice of Exemption (NOE)

The Grossmont Union High School District (District), as the Lead Agency under the California Environmental Quality Act (CEQA), proposes to replace the existing bus maintenance building and improve associated bus maintenance facilities at the maintenance yard at the Grossmont High School (GHS) campus, and to use one of two potential temporary sites to park school buses during construction (hereinafter referred to as the "proposed project").

Project Location:

The proposed project is located on the GHS campus at 1100 Murray Drive, El Cajon, California, in the northern portion of the school campus. Two potential interim sites have been identified to use for bus and employee vehicle parking during construction. The Wagner interim site is located at 1100 Wagner Avenue, El Cajon, and the Valhalla interim site is a vacant lot located at the Valhalla High School campus along Jamacha Road. Figures 1 through 4 depict the project location.

Existing Conditions:

The GHS site is located in a developed residential neighborhood. To the north of the GHS site is Washington Street followed by Harry Griffen Park, to the south are high school classrooms and administrative buildings, to the west is a maintenance yard associated with GHS, and to the east is a ballfield associated with GHS. The existing bus maintenance facility consists of a maintenance building, several auxiliary buildings and shelters, and surface parking for buses and employee vehicles.

The Wagner interim site is within a residential and commercially developed area, with single-family homes to the west, commercial development to the north, North Marshall Avenue and commercial development to the east, and Wagner Drive followed by commercial development to the south. The Wagner interim site is paved with several vacant buildings.

The Valhalla interim site is located in a residential area with open space and agricultural uses in the surrounding vicinity. The site is bordered by residential development to the north, surface parking and ballfields associated with the high school to the east, greenhouse/agricultural uses to the south, and undeveloped space to the west. The Valhalla interim site is a vacant property, with paved portions and portions that are vegetated land.

Description of Project:

The proposed project would involve the demolition of the District's existing bus maintenance facility, existing relocatable buildings, as well as existing paving, fencing, and other support utility systems. The proposed project would entail the construction of a new two-story bus maintenance facility on the same site, to the northwest of the existing building. In addition, the proposed project includes relocating the existing softball pitching mound and batting cage, installing landscape features, installing security fencing and gates, constructing site retaining walls, constructing a new parking lot to accommodate visitors and buses, constructing new

ingress/egress from Washington Street, and utility work including water and sewer line extensions.

During the construction phase of the project, the bus and employee vehicle parking lot will be relocated to one of the two interim off-site locations. The Valhalla site would be prepared for temporary use by scraping approximately six inches of surface scrub and laying gravel, in order to install temporary trailers to be used for office space, temporary night lighting, and portable toilets and handwash stations on the site. The Wagner interim site would not require grading or the installation of temporary buildings; one existing building in the northern portion of the site would be minimally upgraded (i.e. new carpet, paint) to provide office and restroom facilities. Other buildings on the property would not be used. Temporary night lighting would also be installed on the Wagner interim site. The existing ingress/egress would be used for buses and other vehicles at both of the interim sites.

Applicability of Exempt Status:

The proposed activity is a project subject to CEQA. However, the proposed project is Categorically Exempt. The proposed work at the GHS site is Categorically Exempt under Section 15302 – Replacement or Reconstruction and Section 15314 - Minor Additions to Schools. The two interim sites are Categorically Exempt under Section 15304 – Minor Alternations to Land, Section 15311 – Accessory Structures, and Section 15314– Minor Additions to Schools. The proposed project is considered categorically exempt for the following reasons.

Replacement or Reconstruction (Class 2)

Class 2 consists of replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced.

The proposed project would demolish the existing bus maintenance building and reconstruct the maintenance building in the northern portion of the project site. The new bus maintenance facility would serve the same purpose as the existing facility and would not allow for an increase in capacity of buses, employees, or students at the project site. Therefore, the proposed work at the GHS site would be Categorically Exempt under Class 2.

Minor Alternations to Land (Class 4)

Class 4 consists of minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. Examples include, but are not limited to:

(a) Grading on land with a slope of less than 10 percent, except that grading shall not be exempt in a waterway, in any wetland, in an officially designated (by federal, state, or local government action) scenic area, or in officially mapped areas of severe geologic

- hazard such as an Alquist-Priolo Earthquake Fault Zone or within an official Seismic Hazard Zone, as delineated by the State Geologist.
- (b) New gardening or landscaping, including the replacement of existing conventional landscaping with water efficient or fire resistant landscaping.
- (c) Filling of earth into previously excavated land with material compatible with the natural features of the site;
- (d) Minor alterations in land, water, and vegetation on existing officially designated wildlife management areas or fish production facilities which result in improvement of habitat for fish and wildlife resources or greater fish production; (
- (e) Minor temporary use of land having negligible or no permanent effects on the environment, including carnivals, sales of Christmas trees, etc;
- (f) Minor trenching and backfilling where the surface is restored;
- (g) Maintenance dredging where the spoil is deposited in a spoil area authorized by all applicable state and federal regulatory agencies;
- (h) The creation of bicycle lanes on existing rights-of-way.
- (i) Fuel management activities within 30 feet of structures to reduce the volume of flammable vegetation, provided that the activities will not result in the taking of endangered, rare, or threatened plant or animal species or significant erosion and sedimentation of surface waters. This exemption shall apply to fuel management activities within 100 feet of a structure if the public agency having fire protection responsibility for the area has determined that 100 feet of fuel clearance is required due to extra hazardous fire conditions.

The proposed project would provide a temporary parking area for buses and employee vehicles during construction of the GHS bus maintenance facility site. The Wagner interim site would be prepared for temporary use by improving the interior of one of the existing structures onsite and installing temporary night lighting. The Valhalla interim site would be prepared for temporary use by installing portable trailers, restroom facilities, lighting and fencing. All temporary structures and improvements would be removed after construction of the GHS site is complete. No mature trees would be removed at either of the interim sites. Therefore, the interim sites would be Categorically Exempt under Class 4.

Accessory Structures (Class 11)

Class 11 consists of construction, or placement of minor structures accessory to (appurtenant to) existing commercial, industrial, or institutional facilities, including but not limited to:

- (a) On-premise signs;
- (b) Small parking lots;
- (c) Placement of seasonal or temporary use items such as lifeguard towers, mobile food units, portable restrooms, or similar items in generally the same locations from time to time in publicly owned parks, stadiums, or other facilities designed for public use.

The proposed project would install portable facilities and temporary lighting and fencing on the interim site that is chosen for temporary use during construction, and would remove all structures

when construction is complete. Therefore, the proposed work at the two interim sites would be Categorically Exempt under Class 11.

Minor Additions to Schools (Class 14)

Class 14 consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less. The addition of portable classrooms is included in this exemption (State CEQA Guidelines Section 15314).

The proposed project would occur on the GHS school campus, but would not result in an increase in capacity, or an increase in students or staff at the school. The proposed project would improve facilities to serve the bus storage and maintenance which supports the GUHSD. Therefore, all three sites of the proposed project would not include the construction of any new classrooms or other facilities that would increase the student capacity of the campus by more than 25% or ten classrooms.

Exceptions to Use of a Categorical Exemption (State CEQA Guidelines Section 15300.2):

Although the District determined that the proposed project is exempt from CEQA, the District prepared an Initial Study to verify that no significant impacts would occur and the proposed project does not have the potential to trigger any of the exceptions identified in State CEQA Guidelines Section 15300.2 prohibiting the use of a categorical exemption.

- (a) Location. The proposed project would occur entirely within the boundaries of an existing high school campus in an urbanized community. The site has been developed as a school since 1920, and the existing bus maintenance facility has been in place since approximately 1953. The proposed interim sites are currently vacant. The Wagner site was previously developed as a commercial facility with several buildings and paved parking areas, which are now vacant. The Valhalla interim site is currently vacant and previously undeveloped. Both interim sites are located within developed residential and commercial areas. All areas of the project site are either paved or disturbed, and therefore are not environmentally sensitive. Surrounding land uses consist of residential land uses. However, the proposed project would not extend into any offsite areas. Therefore, this exception does not apply to the project.
- (b) **Cumulative Impact.** A review of available information on the City of El Cajon's website identified four relevant cumulative projects within 1 mile of the project site: (1) four detached multi-family residences at 922 Grossmont Avenue, currently under construction; (2) a 40,000 square-foot medical office building at El Cajon Boulevard PACE Center, approved; (3) a new 60,000 square-foot self-storage facility on Marshall Avenue, approved; (4) a 2,000 square-foot shell commercial building on El Cajon Boulevard and Chamberlain Avenue, approved.

A review of available information on the City of La Mesa's website identified two relevant cumulative projects within 1 mile of the project site: (1) a mixed-used development on Severin Drive that is under construction; (2) a 111-bed assisted living facility at 9000 Murray Drive that is under construction.

These projects would be required to conduct a separate environmental analysis and mitigate any potential impacts to the extent feasible.

As discussed in the Initial Study, the proposed project and the eight cumulative projects would be consistent with applicable federal, state, and local regulations and plans associated with aesthetics, biological resources, hydrology/water quality, tribal cultural resources, and utilities and service systems, including the City of El Cajon General Plan and City of La Mesa General Plan. Impacts related to geology/soils, hazards and hazardous materials, and wildfire are generally site-specific and not additive across a landscape. In addition, the less-than-significant impacts on these resources would not add appreciably to impacts of any cumulative projects that could result in a significant cumulative impact due to the minor nature of identified impacts and the low intensity of known cumulative projects. Therefore, cumulatively considerable impacts related to these resource areas would not occur as a result of the proposed project.

Because the project site is already developed and emissions from construction would be temporary and localized, construction emissions for the proposed project would be minimal and would not cause a cumulatively considerable air quality impact. In addition, there would not be a substantial number of other concurrent projects or intensity of construction or operation in the immediate vicinity of the proposed project such that construction of the proposed project would contribute to a temporary cumulative impact related to noise and vibration or transportation and traffic. Once operational, cumulative projects would not contribute to noise levels and air quality or GHG impacts.

Furthermore, the proposed project would not increase the capacity of buses or employees at the bus maintenance facility, therefore would not generate additional vehicle trips that could contribute to vehicle miles traveled (VMT). No other elements of the proposed project would result in operational changes that could contribute to cumulatively considerable impacts when combined with the other projects.

- (c) **Significant Effect.** The proposed project includes the redevelopment of the bus maintenance facility and the temporary use of an interim bus parking site. The project site and surrounding neighborhoods are located within an urbanized area, and no work is proposed offsite that could result in impacts on sensitive vegetation or other environmentally sensitive areas as a result of the proposed project. As such, there is nothing unusual about the project site or surrounding area. Furthermore, there is nothing unusual about the design of the proposed project that could result in a significant effect on the environment due to unusual circumstances. Therefore, there is no reasonable possibility that the proposed project would have a significant effect on the environment due to unusual circumstances, and this exception does not apply to the project.
- (d) **Scenic Highways.** The proposed project would not result in the demolition of existing structures or the construction of new facilities that would directly or indirectly affect an officially designated scenic highway or scenic resources near a scenic highway. Therefore, this exception does not apply to the project.

(e) Hazardous Waste Sites. As discuss in the Initial Study, according to the California State Water Resources Control Board GeoTracker database, no hazardous materials or sites that could be accidentally released are known to occur within the project site. An underground storage tank was removed from the bus maintenance facility site on December 27, 2019, and tank closure was completed per the County of San Diego Department of Environmental Health (DEH). The school campus adjacent to the GHS site is listed on the DTSC Site Mitigation and Brownfield and Reuse Program, the State Tribal Sites – Site Mitigation and Brownfields Reuse Program Database, and on Envirostor as a School Cleanup Program site. The listing is due to a former debris pile adjacent to the southern portion of the Bus Maintenance Facility parking lot. In January of 2011, the Certification of Removal Action was signed, indicating DTSC determined the necessary actions had been completed at the site. Any hazardous materials encountered on the project site would be handled in accordance with all local, state, and federal regulations. In addition, the high school campus adjacent to the GHS site is listed on the leaking underground storage tank (LUST) Information System database. There are four LUST Cleanup Sites listed that are associated with the high school campus, all of which are closed. Though the GHS site is located near sites that are on lists compiled pursuant to Government Code Section 65962.5, these sites are not anticipated to cause a significant hazard to the public or the environment because they are closed or not significant.

Valhalla High School, adjacent to the Valhalla interim site, is listed on Envirostor as a School Cleanup Program site. The site is listed as No Further Action as of November 25, 2009. As this case is closed, this listing does not represent a significant hazard to the lot. However, based on this information, there may be the potential for contaminated soils on the Valhalla interim site. The proposed construction activities at Valhalla involve minor scraping of up to 6 inches and primarily involve the removal of existing disturbed vegetation. All grading activities on the site would comply with existing federal and state regulations for the handling of potentially impacted soil. Based on a review of GeoTracker and Envirostor, the Wagner interim site has had several unauthorized releases. A San Diego County Cleanup Program Site is listed as a closed case as of March 24, 1988. No cleanup actions were listed and no contaminants of concern were specified. A second San Diego County Cleanup Program Site with a waste oil/motor/hydraulic/lubricating release is listed as a closed case as of November 4, 1993. Additionally, a Leaking Underground Storage Tank (LUST) Cleanup Site is located on the property. The case is listed as a closed case as of September 9, 2009. As these cases are listed as closed and there will not be ground disturbance at these locations, the use of the lot is not anticipated to create significant hazard to the public or the environment, and impacts would be ness than significant.

Therefore, though the project site was included on lists compiled pursuant to Government Code Section 65962.5, it is not anticipated to create a significant hazard to the public or the environment. This exception does not apply to the project.

(f) **Historical Resources.** The proposed project includes reconstruction of the bus maintenance facility at the GHS campus, and the temporary use of one of two interim parking sites. There are no buildings or other structures considered historical resources at the GHS site, or the

interim sites. Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines, and this exception does not apply to the project.

References:

Grossmont Union High School District (District). 2020. *Grossmont High School Bus Maintenance Facility Project Initial Study.* September 2020. Prepared by ICF.