draft

initial study/  
mitigated negative declaration

Calexico High School Expansion and Modernization Project

1030 Encinas Avenue, Calexico, CA 92231



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mitigated negative declaration

Calexico High School Expansion and Modernization Project

1030 Encinas Avenue, Calexico, CA 92231

Submitted to:

Calexico Unified School District

1085 Andrade Avenue

Calexico, CA 92231

Prepared by:

School Site Solutions

2015 H Street

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LIST OF abbreviations and ACRONYMS

|  |  |
| --- | --- |
| µg/m3 | micrograms per cubic meter |
| AB | Assembly bill |
| ACM | asbestos containing material |
| BACT | best available control measures |
| BMP | Best management practices |
| CalEEMod | California Emissions Estimator Model |
| CALFIRE | California Department of Forestry and Fire Protection |
| CAPCOA | California Air Pollution Control Officers’ Association |
| Caltrans | California Department of Transportation |
| CARB | California Air Resources Board |
| CBC | California Building Code |
| CCAA | California Clean Air Act |
| CCR | California Code of Regulations |
| CEQA | California Environmental Quality Act |
| CFD | Calexico Fire Department |
| CH4 | Methane |
| CNDDB | California Natural Diversity Database |
| CNEL | community noise equivalent level |
| CO2 | Carbon dioxide |
| CNG | compressed natural gas |
| dB | decibel |
| dBA | A-weighted decibels |
| DPM | diesel particulate matter |
| DSA | Department of the State Architect |
| DTSC | Department of Toxic Substances Control |
| FEMA | Federal Emergency Management Agency |
| FHSZ | Fire hazard severity zone |
| FHWA | Federal Highway Administration |
| GHG | Greenhouse gas |
| IVT | Imperial Valley Transit |
| IS/MND | Initial Study/Mitigated Negative Declaration |
| kV | kilovolt |
| LBP | lead-based paint |
| Ldn | day-night average level |
| Leq | Equivalent continuous sound level |
| Lmax | maximum instantaneous sound level |
| LOS | Level of service |
| LRA | Local responsibility area |
| MT CO2e/yr | metric tons CO2e per year |
| N2O | Nitrous oxide |
| NAHC | Native American Heritage Commission |
| NOx | Nitrogen oxide |
| NPDES | National Pollutant Discharge Elimination System |
| O3 | ozone |
| PCBs | polychlorinated biphenyls |
| PM2.5 | Particulate matter diameter 2.5 microns |
| PM10 | Particulate matter diameter 10 microns |
| PPM | Parts per million |
| PPV | peak particle velocity |
| PRC | Public Resources Code |
| ROG | Reactive organic gases |
| RWQCB | Regional Water Quality Control Board |
| SIP | State Implementation Plan |
| SR | State Route |
| SRA | State Responsibility Area |
| SWPPP | Stormwater Pollution Prevention Plan |
| TAC | Toxic air contaminant |
| U.S. EPA | United States Environmental Protection Agency |
| VHFHSZ | Very High Fire Hazard Severity Zone |
| VMT | Vehicle miles traveled |
| WDRs | Waste discharge requirements |
|  |  |
|  |  |
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|  |  |
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# PROJECT INFORMATION

1. **Project Title:**

Calexico High School Expansion and Modernization Project

1. **Lead Agency Name and Address:**

Calexico Unified School District

1085 Andrade Avenue

Calexico, CA 92231

1. **Contact Person and Phone Number:**

Daniel O’Campo, (760) 768-3888 Ex. 3044

1. **Project Location:**

Calexico High School

1030 Encinas Avenue

Calexico, CA 92231

1. **Project Sponsor’s Name and Address:**

Calexico Unified School District

1085 Andrade Avenue

Calexico, CA 92231

1. **General Plan Designation:**

Existing and Proposed Public Facility (PF)

1. **Zoning:**

Open Space (OS)

1. **Description of Project:**

The Calexico High School Expansion and Modernization Project (project) would be located on the existing Calexico High School campus (Figure 1). The project would consist of the comprehensive modernization and rehabilitation of the campus, including demolition, new construction, and renovation/modernization activities (see Figure 2). The project would demolish and remove 8 buildings and structures (approximately 40,000 square feet; Figure 3) and would construct a new administrative building, two (2) new STEAM classrooms buildings, and a new multi-purpose room/cafeteria (totaling approximately 94,000 square feet). The project would install 17 interim housing structures to serve as classrooms during construction of the project. The interim housing structures would be located on existing hardscape or on previously graded fields as shown on Figure 2. The interim housing structures would be removed upon completion of the permanent buildings.

Other improvements would include campus-wide infrastructure improvements, including domestic water, fire, irrigation, gas, sewer, low voltage (e.g., fire, telephone, data), electrical and storm drainage, Americans with Disabilities Act (ADA) compliance, landscape, hardscape, and exterior paint. A greenhouse would be constructed next to the culinary arts facility.

Calexico High School currently has 102 classrooms on campus, which includes students from 10th grade through 12th grade, a total of 2,267 students. As part of the proposed project, the 9th grade students (686 students) from the Calexico High School 9th grade Campus would be relocated to the current Calexico high school site, resulting in a total student population of 2,953.

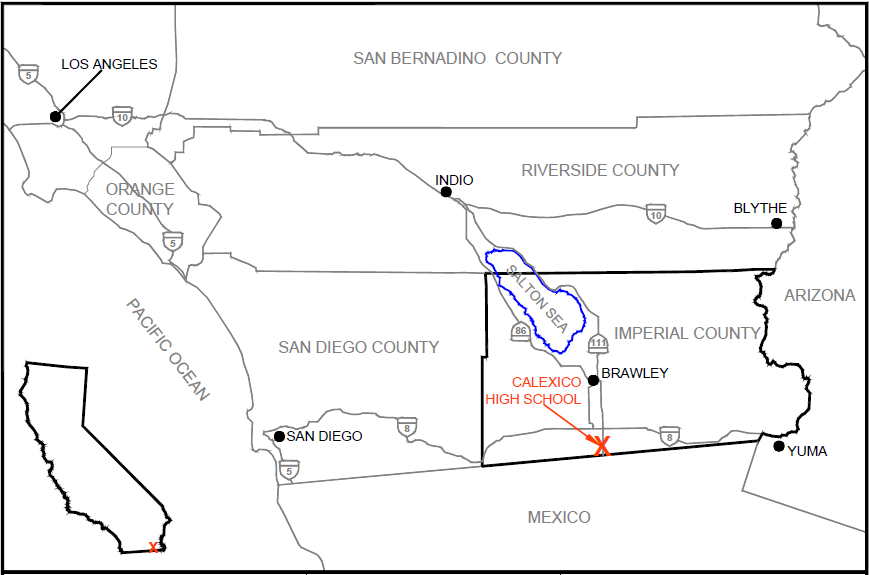
As part of the investigative process for the project, the District conducted a Phase 1 Environmental Site Assessment that called for further action. As a result, a Preliminary Environmental Site Assessment, Supplemental Site Investigation and Removal Action will be completed prior to any construction activities. The District will mitigate any areas of concern based on the necessary risk assessment health and safety requirements, pursuant to CEQA Guidelines Section 15064(f)(2).

1. **Surrounding Land Uses and Setting:**

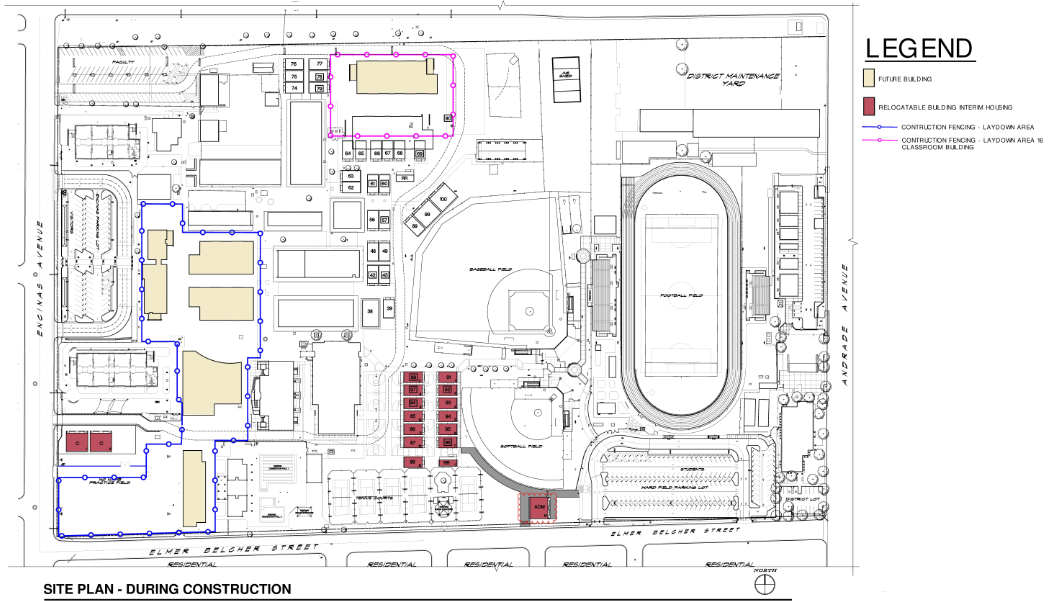
The proposed project is located on the Calexico High School campus in Calexico, California. The existing campus is bound by E. Birch Street to the north, beyond which are High-Density Residential and Commercial Highway Related uses. To the east is Andrade Avenue beyond which are Commercial Office, Low-Density Residential, and Public Facility uses. To the south is E. Belcher Street beyond which are High-Density and Low-Density Residential uses and Public Facility uses. And to the west is Encinas Avenue beyond which are Low-Density Residential uses.

1. **Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):**

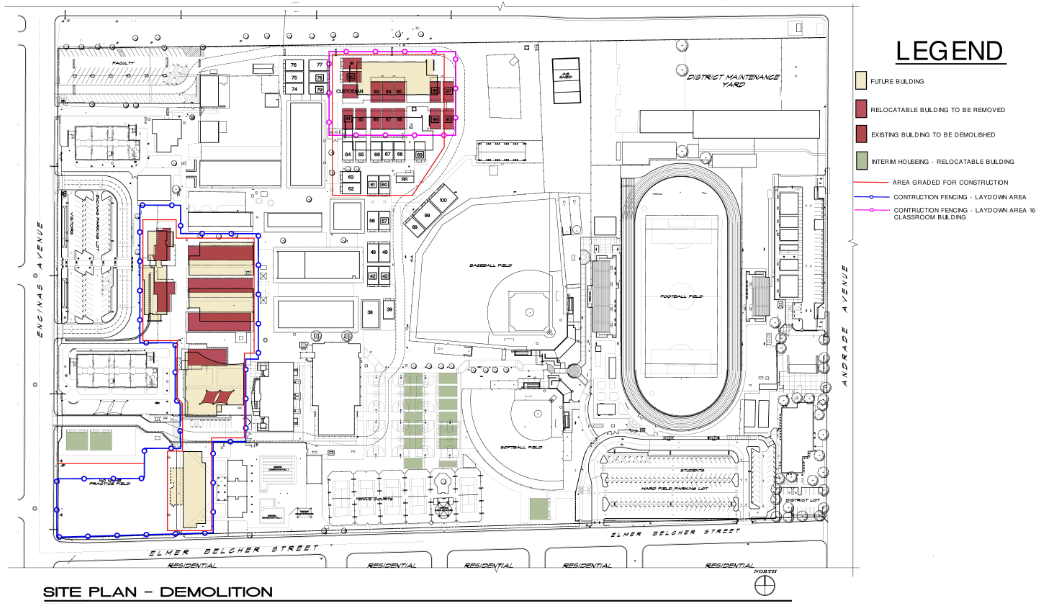
* California Department of Education, School Facilities and Transportation Unit
* Department of Toxic Substance Control
* Division of the State Architect
* California State Clearing House
* California Regional Water Quality Control Board
* City of Calexico Public Works
* City of Calexico Fire Department



1. Project Location



1. Proposed Project



1. Demolition Plan

**Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

The District requested a Sacred Lands File search from the Native American Heritage Commission in May 2021. Pursuant to AB 52, the District contacted the tribal representatives on the list on April 8, 2022. On May 1, 2022, Ms. H. Jill McCormick, M.A. of the Quechan Indian Tribe Historic Preservation Office responded they had no comments on this project. In addition, Stephanie Lewis, Environmental Justice and Tribal Affairs Coordinator from the Department of Toxic Substances Control (DTSC) reached out to eighteen different tribal governments during the month of April 2022. . The DTSC received two responses to the consultation letters that were forwarded on behalf of this DTSC/CUSD project.  Received on April 8, 2022, there were two Tribal governments (in the San Diego area) that expressed interest in the project.  One tribal consultation was completed on April 8, 2022.  There is one other Tribal government that is asking that a compensated Native American Monitor be present during ground disturbing activities associated with the modernization efforts. In the event that the tribal representatives express additional interest in the project and/or the project area, the District will coordinate with the tribes to address any concerns.

# 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 in Chapter 3.0.

|  |  |  |
| --- | --- | --- |
| Aesthetics | Agriculture and Forestry Resources | Air Quality |
| Biological Resources | Cultural Resources | Energy |
| Geology/Soils | Greenhouse Gas Emissions | Hazards & Hazardous Materials |
| Hydrology/Water Quality | Land Use/Planning | Mineral Resources |
| Noise | Population/Housing | Public Services |
| Recreation | Transportation | Tribal Cultural Resources |
| Utilities/Service Systems | Wildfire | Mandatory Findings of Significance |

## Determination

On the basis of this initial evaluation:

I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

I find that the proposed project MAY have a “Potentially Significant Impact” or “Potentially Significant Unless Mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

|  |  |  |
| --- | --- | --- |
|  |  |  |
| Signature |  | Date |

**Special Requirements under the State School Facility Program**

In addition to the CEQA Guidelines, primary and secondary public schools have several additional requirements established by the California Code of Regulations and California Education Code. Table 1identifies the specific health and safety requirements for a state-funded new school or a state-funded addition to an existing school site. These health and safety requirements are outlined in the California Department of Education (CDE) School Site Selection and Approval Guide. The analyses and response is included under the relevant section identified in the table below.

1. Special Requirements for School Site Selection and Approval

|  |  |  |
| --- | --- | --- |
| Topic | Environmental Code | Environmental Checklist |
| Air Quality | | |
| 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);  Ed. Code§ 17213(c)(2)(C) | Section 3.3 Air Quality, Question (e) |
| Would the project create an air quality hazard due to the placement of a school within one-quarter mile of:  (a) permitted and non-permitted 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);  Ed. Code § 17213 (b) | Section 3.3 Air Quality, Question (f) |
| Geology and Soils | | |
| Does the site contain an active earthquake fault or fault trace, or is the site located within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan? | CCR, Title 5 § 14010(f);  Ed. Code, § 17212 | Section 3.7 Geology and  Soils, Question (a) (i) |
| Would the project involve the construction, reconstruction, or relocation of any school building on a site subject to moderate to high liquefaction? | CCR, Title 5 § 14010(i) | Section 3.7 Geology and Soils, Question (a)(iii) |
| Would the project involve the construction, reconstruction, or relocation of any school building on a site subject to landslides? | CCR, Title 5 § 14010(i) | Section 3.7 Geology and Soils, Question (a)(iv) |
| Would the project involve the construction, reconstruction, or relocation of any school building on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building? | CCR, Title 5 § 14010(f);  Ed. Code § 17212 | Section 3.7 Geology and Soils, Question (a)(i) |
| Hazards and Hazardous Materials | | |
| Is the property line of the proposed school site less than the following distances from the edge of respective powerline easements: (1) 100 feet of a 50-133 kV line; (2) 150 feet of a 220-230 kV line; or (3) 350 feet of a 500-550 kV line? | CCR, Title 5 § 14010(c) | Section 3.9 Hazards and  Hazardous Materials, Question (h) |
| Is the proposed school site located near an aboveground water or fuel storage tank or within 1,500 feet of an easement of an aboveground or underground pipeline that can pose a safety hazard to the site? | CCR, Title 5 § 14010(h) | Section 3.9 Hazards and  Hazardous Materials, Question (i) |
| Is the proposed school site situated within 2,000 feet of a significant disposal of hazardous waste? | CCR, Title 5 § 14010(t) | Section 3.9 Hazards and  Hazardous Materials,  Question (d) |
| 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? | PRC § 21151.8 (a)(1)(C) | Section 3.9 Hazards and  Hazardous Materials,  Question (i) |
| Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site? *(Does not apply to school sites approved by CDE prior to January 1, 1997.)* | Ed. Code § 17215.5 (a) | Section 3.9 Hazards and  Hazardous Materials,  Question (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? | PRC § 21151.8 (a)(1)(A) | Section 3.9 Hazards and  Hazardous Materials,  Question (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? | PRC § 21151.8 (a)(1)(B) | Section 3.9 Hazards and  Hazardous Materials,  Question (d) |
| If prepared, has the risk assessment been performed with a focus on children’s health posed by a hazardous materials release or threatened release, or the presence of naturally occurring hazardous materials on the school site? | Ed. Code § 17210.1  (a)(3) | Section 3.9 Hazards and  Hazardous Materials,  Question (c) |
| If a response action is necessary and proposed as part of this project, has it been developed to be protective of children’s health, with an ample margin of safety? | Ed. Code § 17210.1  (a)(4) | Section 3.9 Hazards and  Hazardous Materials,  Question (l) |
| Is the proposed school site within two miles, measured by airline, of that point on an airport runway or potential runway included in an airport master plan that is nearest to the site? *(Does not apply to school sites acquired prior to January 1,1966.)* | Ed. Code § 17215  (a)&(b) | Section 3.9 Hazards and  Hazardous Materials,  Question (e) |
| Hydrology and Water Quality | | |
| Is the project site subject to flooding or dam inundation? | CCR, Title 5 § 14010(g);  Ed. Code § 17212; | Section 3.10 Hydrology and Water Quality,  Question (d) |
| Land Use and Planning | | |
| Would the proposed school conflict with any existing or  proposed land uses, such that a potential health or safety risk to students would be created? | CCR, Title 5 § 14010(m) | Section 3.11 Land Use and Planning, Question(b) |
| Noise | | |
| Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the education program? | CCR, Title 5 § 14010(e) | Section 3.13 Noise, Question (d) |
| Public Services | | |
| Does the site promote joint use of parks, libraries, museums, and other public services? | CCR, Title 5 § 14010(o) | Section 3.15 Public Services, Question (f) |
| Transportation | | |
| Is the proposed school site within 1,500 feet of a railroad track easement? | CCR, Title 5 § 14010(d) | Section 3.17  Transportation, Question (e) |
| Is the site easily accessible from arterials and is the minimum peripheral visibility maintained for driveways per Caltrans' Highway Design Manual? | CCR, Title 5 § 14010(k) | Section 3.17  Transportation, Question (f) |
| Are traffic and pedestrian hazards mitigated per Caltrans' School Area Pedestrian Safety manual? | CCR, Title 5 § 14010(l) | Section 3.17  Transportation, Question (g) |

# CEQA ENVIRONMENTAL CHECKLIST

## Aesthetics

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Except as provided in Public Resources Code Section 21099, would the project: |  |  |  |  |
| 1. Have a substantial adverse effect on a scenic vista? |  |  |  |  |
| 1. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway? |  |  |  |  |
| 1. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality? |  |  |  |  |
| 1. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area? |  |  |  |  |

### Impact Analysis

a. Would the project have a substantial effect on a scenic vista?

The project site is in an urbanized setting in Calexico. Although lands affected by the proposed project are zoned as Open Space (OS), such lands have largely been previously disturbed and/or are developed as part of the Calexico High School campus. The nearest designated state scenic highway is Interstate 8 (1-8), approximately 32 miles to the west of the project site (Caltrans 2022). No state scenic vistas or scenic highways are in proximity to the project site. Therefore, the proposed project would not have a substantial adverse effect on a scenic vista or highway. No impact would occur.

b. Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

The proposed project is not located adjacent to or within view from a state scenic highway. The nearest designated state scenic highway is Interstate 8 (1-8), approximately 32 miles to the west of the project site (Caltrans 2022). No scenic resources, mature trees, rock outcroppings, or historic buildings are located on-site. Therefore, the proposed improvements would not damage scenic resources, including, but not limited to, trees, rock outcroppings, or historic buildings within a state scenic highway. No impact would occur.

c. In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

The proposed project is located in an urbanized part of Calexico. While the proposed project site is zoned Open Space, the existing high school campus is largely developed. As referenced in the City of Calexico Municipal Code Section 17.09.530, “Development standards such as site dimensions, height limitations and setbacks [in areas zoned for Open Space] shall all be determined on a site-by-site basis. Consideration shall be given to surrounding properties and developments in order to blend and remain consistent with the area.” The proposed Project would be consistent with the height, architectural style, and setbacks of the existing campus. This impact would be less than significant.

d. Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

The proposed project includes expansion and modernization of the existing Calexico High School campus, including construction of a new administration building, new classroom buildings, and a new multi-purpose room/cafeteria. The existing Calexico High School campus includes light sources. The project would include a variety of indoor and outdoor lighting. Lighting would be provided for adequate illumination for safe access and basic security. Exterior lighting would include wall-mounted fixtures on buildings and bollard lighting. Pole-mounted lighting would be shielded and directional so as to direct light away from surrounding land uses. Because the project would include nighttime lighting consistent with existing uses, this impact would be less than significant.

## 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 the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. 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? |  |  |  |  |
| 1. Conflict with existing zoning for agricultural use, or a Williamson Act contract? |  |  |  |  |
| 1. 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))? |  |  |  |  |
| 1. Result in the loss of forest land or conversion of forest land to non-forest use? |  |  |  |  |
| 1. 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? |  |  |  |  |

### Impact Analysis

a. Would the project 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?

The proposed project is located on the existing Calexico High School campus. According to available maps published by the California Department of Conservation (DOC 2018) as part of the Farmland Mapping and Monitoring Program (FMMP), the project site is designated as Urban and Built-Up Land, which is land not included in any other mapping category. Common examples include residential, industrial, commercial, institutional facilities, cemeteries, airports, golf courses, sanitary landfills, sewage treatment, and water control structures (DOC 2018). Because there is no FMMP-designated farmland on-site, the project would not convert any such lands to nonagricultural use. No impact would occur.

b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?

The Land Use Element of the City of Calexico's (2007) General Plan Update designates lands affected by the proposed Project as PF (Public Facilities); the site is zoned OS (Open Space). The Project site is not intended for agricultural use. The site is not subject to a Williamson Act contract, and no agricultural uses are present on or adjacent to the subject site. The project would not create a conflict with existing agricultural zoning for agricultural use or a Williamson Act contract. No impact would occur.

c. Would the project 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))?

The project site is surrounded by residential, commercial, and public facility uses. The site’s existing zoning “OS” (Open Space) does not support the definitions provided by Public Resources Code (PRC) Section 42526 for timberland, PRC Section 12220(g) for forestland, or Government Code Section 51104(g) for timberland zoned for production. Therefore, no impacts related to the conversion of timberlands or forest land would occur.

d. Would the project result in the loss of forest land or conversion of forestland to non-forest use?

As discussed in the response 3.2.1(c), the project site is surrounded by residential, commercial, and public facility uses. Implementation of the project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

e. Would the project 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?

The project site has been dedicated as a school site since at least 1957. No forest land is located within the project site or the vicinity of the Project site. Implementation of the proposed project would not result in changes to the environment that, due to its location or nature, could result in the conversion of farmland to non-agricultural use or converting forest land to non-forest use. Therefore, no impact would occur.

## Air Quality

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

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Conflict with or obstruct implementation of the applicable air quality plan? |  |  |  |  |
| 1. 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? |  |  |  |  |
| 1. Expose sensitive receptors to substantial pollutant concentrations? |  |  |  |  |
| 1. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people? |  |  |  |  |
| 1. 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? |  |  |  |  |
| 1. Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and non-permitted 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? |  |  |  |  |

### Impact Analysis

a. Would the project conflict with or obstruct implementation of the applicable air quality plan?

The air quality in Imperial County is under the jurisdiction of the Imperial County Air Pollution Control District (ICAPCD). The ICAPCD is the local air quality agency and has shared responsibility with the California Air Resources Board (CARB) for ensuring that state and federal ambient air quality standards are achieved and maintained in the county. ICAPCD responsibilities include monitoring ambient air quality, planning activities such as modeling and maintenance of the emissions inventory, and preparing clean air plans.

Clean air plans, known as State Implementation Plans (SIP), must be prepared for areas designated as nonattainment areas to demonstrate how the area will come into attainment of the exceeded ambient air quality standard. Air basins with air quality that exceed adopted air quality standards are designated as nonattainment areas for the relevant air pollutants.

Both the U.S. Environmental Protection Agency (U.S. EPA) and CARB have established ambient air quality standards for common pollutants. These ambient air quality standards represent safe levels of contaminants that avoid specific adverse health effects associated with each pollutant.

The federal and State ambient air quality standards are summarized in Table 2 for important pollutants. The federal and State ambient standards were developed independently and differ in some cases. In general, the California standards are more stringent. This is particularly true for ozone, particulate matter with diameter 2.5 microns (PM2.5), and particulate matter with diameter 10 microns (PM10). The U.S. EPA signed a final rule for the federal ozone eight-hour standard of 0.070 parts per million (ppm) on October 1, 2015, and was effective as of December 28, 2015 (equivalent to the California state ambient air quality eight-hour standard for ozone).

1. Federal and State Air Quality Standards

|  |  |  |  |
| --- | --- | --- | --- |
| Pollutant | Averaging Time | Federal Primary Standard | State Standard |
| Ozone | 1-Hour  8-Hour | -- | 0.09 ppm  0.070 ppm |
| Carbon Monoxide | 8-Hour  1-Hour | 9.0 ppm  35.0 ppm | 9.0 ppm  20.0 ppm |
| Nitrogen Dioxide | Annual  1-Hour | 0.053 ppm  0.100 ppm | 0.03 ppm  0.18 ppm |
| Sulfur Dioxide | Annual  24-Hour  1-Hour | 0.03 ppm  0.14 ppm  0.075 ppm | --  0.04 ppm  0.25 ppm |
| PM10 | Annual  24-Hour | --  150 µg/m3 | 20 µg/m3  50 µg/m3 |
| PM2.5 | Annual  24-Hour | 12 µg/m3  35 µg/m3 | 12 µg/m3  -- |
| Lead | 30-Day Avg.  3-Month Avg. | --  0.15 µg/m3 | 1.5 µg/m3  -- |

Source: California Air Resources Board, 2019.

Notes: ppm = parts per million, µg/m3 = micrograms per cubic meter

In accordance with the California Clean Air Act (CCAA), the CARB is required to designate areas of the state as attainment, nonattainment, or unclassified with respect to applicable standards. An “attainment” designation for an area signifies that pollutant concentrations did not violate the applicable standard in that area. A “nonattainment” designation indicates that a pollutant concentration violated the applicable standard at least once, excluding those occasions when a violation was caused by an exceptional event, as defined in the criteria. An “unclassified” designation signifies that the data do not support either an attainment or nonattainment status. The CCAA divides districts into moderate, serious, and severe air pollution categories, with increasingly stringent control requirements mandated for each category.

Imperial County is classified a nonattainment area for federal and state PM10 and ozone (03) standards (the pollutants described as reactive organic gases [ROG] and oxides of nitrogen [NOx] are ozone precursors).

The region's SIP includes the ICAPCD air quality plans: Final 2009 8-Hour Ozone Modified Air Quality Management Plan, Final 2009 Reasonably Available Control Technology State Implementation Plan, and Final PM10 2009 State Implementation Plan. Generally, project compliance with all the ICAPCD rules and regulations results in conformance with the ICAPCD air quality plans.

Furthermore, the county is classified a nonattainment area for federal PM2.5 standards. Imperial County is an unclassified or attainment area for all other criteria air pollutants, including sulfur oxide, carbon monoxide, and lead. Unclassified areas are those with insufficient air quality monitoring data to support a designation of attainment or nonattainment but are generally presumed to comply with the ambient air quality standard.

ICAPCD Rule 925 establishes the conformity criteria and procedures necessary to ensure conformance with the SIP. Projects are considered less than significant when the totals of direct and indirect emissions are below specified emissions levels (40 CFR Section 51.853[b][1]). As discussed below, the project's emissions would be below the ICAPCD's threshold of significance after implementation of **Mitigation Measure AQ-1**. The proposed project would also conform to the Calexico General Plan; no changes to the existing land use designation (OS- Open Space) that applies to lands affected by the project are required or proposed. Therefore, the project would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant with mitigation incorporated.

b. Would the project 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?

The project site is located in Calexico, Imperial County. State and federal air quality standards are often exceeded in many parts of the county. The project's potential short-term construction-period and long-term operational-period air quality impacts are discussed below.

**Construction Emissions**

The California Emissions Estimator Model (CalEEMod), Version 2020.4.0, was used to estimate construction emissions for the proposed project. For purposes of this CalEEMod analysis, the construction schedule was estimated to be 18 months, starting in winter 2023. Appendix A contains CalEEMod output worksheets. Results are summarized in Table 3.

1. Project Construction Emissions

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Emissions (lbs/day)** | | | | | | |
| **CO** | | **NOx** | **ROC** | **SOx** | **PM10** | **PM2.5** |
| Year 2023 | 11.72 | | 10.64 | 1.17 | 0.022 | 139.14 | 14.42 |
| Year 2024 | 0.68 | | 0.46 | 3.63 | 0.0011 | 5.75 | 0.59 |
| ICAPCD Significance Threshold | 550 | | 100 | 75 | N/A | 150 | N/A |
| **Exceed Threshold?** | No | | No | No | No | No | No |
| Source: Compiled by SSS, Inc. (2022).  CO = carbon monoxide  N/A = Not Applicable  NOX = nitrogen oxides  PM10 = particulate matter less than 10 microns in size | | PM2.5 = particulate matter less than 2.5 microns in size  ROC = reactive organic compounds  ICAPCD = Imperial County Air Pollution Control District  SOX = sulfur oxides  Lbs/day = pounds per day | | | | | |

As shown in Table 3, all construction emissions would be less than significant before implementation of mitigation. However, to ensure construction emissions are minimized, **Mitigation Measure AIR-1** would be implemented to ensure construction-related emissions would be less than significant.

CalEEMod was also used to estimate long-term operational emissions, as well as emissions associated with area and energy sources (i.e., natural gas combustion, landscape maintenance, periodic architectural coating, and consumer products).

Model results are shown in Table 4. Appendix A contains model output worksheets.

As shown in Table 4, project-related long-term air emissions would occur primarily from vehicle trips associated with the proposed project (i.e., mobile source emissions). Project-related long-term air emissions would also occur from the use of landscape equipment and from the use of consumer products (i.e., area sources).

1. Project Operation Emissions

|  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- |
|  | **Emissions (lbs/day)** | | | | | | |
| **CO** | | **NOx** | **ROC** | **SOx** | **PM10** | **PM2.5** |
| Area Source Emissions | 0.0047 | | 0.00005 | 2.37 | 0.00 | 0.00 | 0.00 |
| Energy Source Emissions | 0.18 | | 0.22 | 0.024 | 0.0013 | 0.017 | 0.017 |
| Mobile Source Emissions | 4.17 | | 0.63 | 0.85 | 0.0067 | 0.71 | 0.19 |
| **Total Emissions** | **4.36** | | **0.85** | **3.24** | **0.0080** | **0.73** | **0.21** |
| ICAPCD Significance Threshold | 550 | | 137 | 137 | 550 | 150 | 550 |
| **Exceed Threshold?** | No | | No | No | No | No | No |
| Source: Compiled by SSS, Inc. (2022).  CO = carbon monoxide  N/A = Not Applicable  NOX = nitrogen oxides  PM10 = particulate matter less than 10 microns in size | | PM2.5 = particulate matter less than 2.5 microns in size  ROC = reactive organic compounds  ICAPCD = Imperial County Air Pollution Control District  SOX = sulfur oxides  tons/yr = tons per year | | | | | |

The results shown in Table 4 indicate the project would not exceed the significance criteria for annual emissions. Therefore, the proposed project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, and impacts would be less than significant. No mitigation is required.

c. Would the project expose sensitive receptors to substantial pollutant concentrations?

During construction, diesel equipment would be operating. Diesel particulate matter (DPM) is known to the State of California as a toxic air contaminant (TAC). The risks associated with exposure to substances with carcinogenic effects are typically evaluated based on a lifetime of chronic exposure, which is defined in the California Air Pollution Control Officers’ Association (CAPCOA) Air Toxics “Hot Spots” Program Risk Assessment Guidelines as 24 hours per day, seven days per week, 365 days per year, for 70 years. DPM would be emitted during the short term of construction assumed for the proposed project from heavy equipment used in the construction process. Because diesel exhaust particulate matter is considered carcinogenic, long-term exposure to diesel exhaust emissions has the potential to result in adverse health impacts. Due to the short-term nature of project construction and the implementation of **Mitigation Measure AIR-1**, impacts from exposure to diesel exhaust emissions during construction would be less than significant. No DPM-generating equipment, aside from potential landscape equipment, would be located on-site during operation of the proposed project; therefore, the proposed project would result in intermittent operation of DPM-generating equipment. This impact would be less than significant.

d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The CEQA guidelines indicate that a significant impact would occur if the proposed project would create objectionable odors affecting a substantial number of people. Construction of the proposed project would emit diesel exhaust and volatile organic compounds, which are objectionable to some; however, emissions will disperse rapidly from the project site and the activity would be temporary. Impacts due to objectionable odors would be less than significant.

e. 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?

Busy traffic corridors are defined as 100,000 vehicles per day in an urban area as defined by the California Department of Education (CDE). The nearest highway is Highway 98 (E. Birch Street), which is located immediately north of the proposed project area. Highway 98 in the project vicinity experiences an average daily traffic of 22,800 vehicles per day (Caltrans 2017). There would be no impact related to placement of a school within 500 feet of a freeway or a busy traffic corridor.

f. Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and non-permitted 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?

Within one-quarter mile of the proposed project area are residential, commercial, and school-related uses. These uses would not create an air quality hazard for the proposed project. As discussed in response 3.3.1(e), the nearest highway is immediately north of the proposed project area; however, Highway 98 does not satisfy the definition of a busy traffic corridor. The proposed project would not cite a new school facility at the proposed project site. And no agricultural operations are located within 0.25 mile of the proposed school site. The project area is located approximately 0.8 mile northeast of the existing Union Pacific line. This impact would be less than significant.

### Mitigation Measures

**Mitigation Measure AIR-1:** The project shall adopt best available control measures (BACT) to minimize emissions from surface disturbing activities to comply with ICAPCD Regulation VIII (Fugitive Dust Rules). These measures include the following:

* All disturbed areas, including bulk material storage which is not being actively utilized, shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by using water, chemical stabilizers, dust suppressants, tarps, or other suitable material such as vegetative ground cover.
* All on-site and off-site unpaved roads shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering.
* All unpaved traffic areas of 1 acre or more with 75 or more average vehicle trips per day shall be effectively stabilized and visible emissions shall be limited to no greater than 20 percent opacity for dust emissions by paving, chemical stabilizers, dust suppressants, and/or watering.
* The transport of bulk materials shall be completely covered unless 6 inches of freeboard space from the top of the container is maintained with no spillage and loss of bulk material. In addition, the cargo compartment of all haul trucks shall be cleaned and/or washed at the delivery site after removal of bulk material.
* All track-out or carry-out shall be cleaned at the end of each workday or immediately when mud or dirt extends a cumulative distance of 50 linear feet or more onto a paved road within an urban area.
* Bulk material handling or transfer shall be stabilized prior to handling or at points of transfer with application of sufficient water, chemical stabilizers, or by sheltering or enclosing the operation and transfer line.
* The construction of any new unpaved road shall be prohibited within any area with a population of 500 or more unless the road meets the definition of a temporary unpaved road. Any temporary unpaved road shall be effectively stabilized, and visible emissions shall be limited to no greater than 20 percent opacity for dust emission by paving, chemical stabilizers, dust suppressants, and/or watering.

## Biological Resources

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. 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? |  |  |  |  |
| 1. 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? |  |  |  |  |
| 1. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means? |  |  |  |  |
| 1. 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? |  |  |  |  |
| 1. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance? |  |  |  |  |
| 1. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan? |  |  |  |  |

### Impact Analysis

a. Would the project 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?

A search of the California Department of Wildlife’s California Natural Diversity Database (CNDDB) Calexico 7.5-minute quadrangle identified 16 occurrences of special-status plant and animal species. However, no suitable habitat is present within the proposed project area to support the special-status species. No native habitat is present on or adjacent to the project site. Because of the surrounding built environment, no mammals other than raccoons, domestic dogs and cats occur in the area, nor do any reptilian species. This impact is less than significant.

b. Would the project 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?

Review of the National Wetlands Inventory indicates there are no surface waters within 0.25 mile of the project site. Therefore, no direct or indirect impacts to riparian habitat or other sensitive natural communities are anticipated as a result of project activities.

c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

Review of the National Wetlands Inventory indicates no wetlands are mapped on the project site. Therefore, no direct or indirect impacts to federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means are anticipated as a result of project activities.

d. Would the project 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?

The project site has been previously graded and developed and is surrounded by residential, commercial, and educational uses. The project site does not contain wildlife travel routes, such as a riparian strip, ridgeline, drainage, or wildlife crossings, such as a tunnel, culvert, or underpass.

The project site and adjacent areas do not support resident or migratory fish species or wildlife nursery sites. No established resident or migratory wildlife corridors occur within the project site. Therefore, the project would not interfere substantially with or impede: (1) the movement of any resident or migratory fish or wildlife species, (2) established resident or migratory wildlife corridors, or (3) the use of wildlife nursery sites.

e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The proposed project does not support protected biological resources. Therefore, the project would not conflict with local policies or ordinances protecting biological resources.

f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project site is not part of an adopted habitat conservation plan, natural communities conservation plan, or other conservation plan. Therefore, construction and operation of the proposed project would have no impact to an approved habitat conservation plan.

## Cultural Resources

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5? |  |  |  |  |
| 1. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5? |  |  |  |  |
| 1. Disturb any human remains, including those interred outside of formal cemeteries? |  |  |  |  |

### Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?

Historic structures and sites are defined by local, state, and federal criteria. To be considered eligible for the National Register of Historic Places, a property must meet the National Register Criteria for Evaluation. This evaluation involves the examination of the property's age, integrity, and significance. A property may be historic if it is old enough to be considered historic (generally considered to be at least 50 years old and appearing the way it did in the past). Buildings and properties will qualify for a listing on the National Register if they are integral parts of districts that meet the criteria identified.

The high school campus was originally constructed in approximately 1952 and has been modified in subsequent years. The campus has undergone extensive renovations and additions. In 2016, there was a swimming pool project that involved the construction of a new 50 meter pool.  In addition, there was most recently a culinary arts project that involved the complete renovation of one classroom wing into a culinary arts academy and the conversion of the Godfrey Gym into a fitness center.Because the campus has been modified through additions and other alterations to original building fabric, addition of a new building would not alter the significance of a historical resource. Therefore, no impact related to historic built resources would result with implementation of the proposed project.

b. Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?

The project site and surrounding lands have been heavily disturbed by previous grading activity and are underlain by a variable thickness of artificial fill or disturbed soil typical of a developed area. Therefore, the potential for the site to contain archaeological resources is considered to be low.

However, unknown or unrecorded resources may potentially be revealed during construction activities. This may occur if ground disturbance activities penetrate deeper than previous work performed. California PRC protects archaeological, paleontological, and historical sites with a wide variety of state policies and regulations in conjunction with the CEQA. Furthermore, all construction activities must comply with PRC Section 21083.2-21084.1 and CEQA Guidelines Section 15064.5 and 15126.4(b) which address the protection of archaeological and historical resources. With the implementation of **Mitigation Measure CULT-1**, this impact would be less than significant.

c. Would the project disturb any humans remains, including those interred outside of formal cemeteries?

The project site and surrounding area has been mass graded. During previous ground disturbance activities, no human remains were identified or recorded onsite. In the unlikely event that human remains are discovered, during precise grading or construction activities, the project would be subject to California Health and Safety Code Section 7050.5 and PRC Section 5097.98. California Health and Safety Code Section 7050.5 identify the required procedures to follow in the unlikely discovery of human remains. PRC Section 5097.98 stipulates the notification process during the discovery of Native American human remains, descendants, disposition of human remains, and associated artifacts. Additionally, with the implementation of **Mitigation Measure CULT-1**, this impact would be less than significant.

### Mitigation Measures

**Mitigation Measure CULT-1:** If unidentified cultural materials are encountered during project construction, all work within 50 feet shall be halted until an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and/or historical archaeology can evaluate the findings and make recommendations. The project contractor shall divert, direct or temporarily halt ground-disturbing activities in the area of discovery to allow evaluation of potentially significant historical resources. The archaeologist shall immediately notify the Calexico Unified School District of such findings at the time of discovery. The significance of the discovered resource(s) shall be determined by the archaeologist, in consultation with the District and the Native American community. The District must concur with the evaluation procedures before grading activities are allowed to resume. For significant cultural and/or historical resources, a Research Design and Data Recovery Program shall be prepared and carried out to mitigate impacts before grading activities in the area of discovery is allowed to resume. Any human bones of Native American origin shall be turned over to the appropriate Native American group for reburial.

All materials collected shall be cleaned, cataloged, and permanently curated with an appropriate institution. All artifacts shall be analyzed to identify function and chronology as they relate to the history of the area. Faunal material shall be identified as to species, and specialty studies shall be completed as appropriate. Additionally, any sites and/or features encountered during the monitoring program shall be recorded on the applicable Department of Parks and Recreation forms (DPR 523A/B, et al.) and submitted to an appropriate cultural resources repository with the final monitoring results report.

## Energy

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation? |  |  |  |  |
| 1. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency? |  |  |  |  |

### Impact Analysis

a. Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?

The proposed project would not have a direct or cumulative impact, or create wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation of the proposed project. As shown in Appendix A, the project is estimated to generate 476,680 kilowatt-hours per year. Also, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The only energy consumed would be through fossil fuels (gasoline and diesel operated equipment) during construction-related activities and operation of the equipment and electricity in the building, once operational. The proposed lighting control systems would be in compliance with requirements of the current California Energy Commission efficiency standards for non-residential buildings. Therefore, the proposed project would result in a less-than-significant impact related to wasteful, inefficient, or unnecessary consumption of energy resources.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Title 24 is designed to provide certainty and uniformity throughout California while ensuring that the efficient and non‐wasteful consumption of energy is carried out through design features. Adherence to Title 24 is deemed necessary to ensure that no significant impacts occur from the inefficient, wasteful, and unnecessary consumption of energy. The proposed lighting control systems would be in compliance with requirements of the current California Energy Commission efficiency standards for non-residential buildings. The proposed building would be compliant with Title 24; therefore, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. This impact would be less than significant.

## Geology and Soils

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: |  |  |  |  |
| 1. 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. |  |  |  |  |
| 1. Strong seismic ground shaking? |  |  |  |  |
| 1. Seismic-related ground failure, including liquefaction? |  |  |  |  |
| 1. Landslides? |  |  |  |  |
| 1. Result in substantial soil erosion or the loss of topsoil? |  |  |  |  |
| 1. 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? |  |  |  |  |
| 1. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property? |  |  |  |  |
| 1. 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? |  |  |  |  |
| 1. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature? |  |  |  |  |

### Impact Analysis

a. Would the project directly or indirectly cause 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.

The project site is not within a designated State of California Alquist-Priolo Earthquake Fault Zone. No known active regional faults cross through the project site, and the site is not within or adjacent to an Alquist-Priolo Earthquake Fault Zone as defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act (ArcGIS 2022). The nearest fault is in the Imperial Fault, which is located approximately 6 miles northeast of the project area. Surface rupture occurred along the Imperial Fault in 1940 and is considered capable of a magnitude 7.0 event (SCEDC 2022). Because the site is not within or adjacent to an Alquist-Priolo Earthquake Fault Zone as defined by the State of California in the Alquist-Priolo Earthquake Fault Zoning Act, no fault rupture-related impacts to the project are anticipated. No mitigation is required.

ii. Strong seismic ground shaking?

The extent of ground shaking depends on several factors including the magnitude of the causative earthquake, the distance to the epicenter, and the geologic unit underlying the site. The project site is located in a region traditionally characterized by moderate to high seismic activity, which could result in damage to structures and other improvements due to ground shaking. Strong seismic ground shaking generated by seismic activity is considered a potential impact that may affect the proposed project. Implementation of **Mitigation Measure GEO-1**, which requires the proposed project to comply with the seismic design criteria outlined in the California Building Code (CBC) would reduce impacts associated with strong ground shaking to a less-than-significant level.

iii. Seismic-related ground failure, including liquefaction?

According to the City of Calexico Safety Element of the General Plan, the City of Calexico and the surrounding area is susceptible to liquefaction because of crop irrigation and the geologically young and unconsolidated sediment soil. Implementation of **Mitigation Measure GEO-1**, which requires the proposed project to comply with the seismic design criteria outlined in the CBC would reduce impacts associated with liquefaction to a less-than-significant level.

iv. Landslides?

Due to the absence of slopes on or adjacent to the project site and because no significant slopes would be constructed as part of the project, the potential for landslides is considered very low. Therefore, no landslide-related impacts to the project are anticipated. No mitigation is required.

b. Would the project result in substantial soil erosion or the loss of topsoil?

The extent and severity of erosion potential is related to the type of soil, the velocity of concentrated runoff that may contact unprotected soil, and the length of time during which unprotected soils are in contact with concentrated runoff. Generally, the less cohesive the soils and the longer the soils are unprotected and exposed to environmental elements, the greater the impact. The Natural Resources Conservation Service classifies soil based on susceptibility to erosion. The on-site soil units consist of Imperial silty clay, wet; Imperial-Glenbar silty clay loams, wet, 0 to 2 percent slopes; and Meloland very fine sandy loam, wet. Both the Imperial soil and Glenbar soil are deep with slow permeability and very high available water capacity. Surface runoff is slow and the hazard of erosion is slight (USDA 1981).

The susceptibility to erosion of soils at the site may increase during construction when the soils are exposed during grading activities. Stockpiled soils may also be vulnerable to erosion while construction is in progress. Best management practices (BMPs) would be implemented during construction activities. Construction BMPs would include Erosion Control and Sediment Control BMPs designed to minimize erosion and sedimentation. Implementation of BMPs would reduce impacts associated with erosion during construction activities to a less-than-significant level.

c. Would the project 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?

Due to the absence of slopes on or adjacent to the project site and because no significant slopes would be constructed as part of the project, the potential for landslides is considered very low. Therefore, the potential for the project to be impacted by landslides is to be very low. Therefore, no landslide-related impacts to the project are anticipated. No mitigation is required.

Liquefaction is the loss of soil strength caused by a significant seismic event. It occurs primarily in loose, fine to medium-grained sands, and in very soft to medium stiff silts that are saturated by groundwater. Lateral spreading is a phenomenon that can be associated with liquefaction when sloping ground is present. Groundwater is necessary for liquefaction or lateral spreading to occur. Due to the depth to groundwater (more than 80 feet below ground surface) and the absence of significant slopes at the project site, no impacts related to liquefaction or lateral spreading are anticipated. No mitigation is required.

Subsidence is the settlement of the ground surface relative to the surrounding area, with little or no horizontal movement. The primary potential cause for subsidence under static conditions at the project site would be the consolidation of compressible soils near the surface due to the foundation loads. The site soils also have a slight potential for subsidence from collapse due to hydroconsolidation, which is a phenomenon that occurs primarily in loose, dry, sandy soils. When water passes through susceptible soils, the voids between particles collapse, resulting in subsidence. Soil settlement at the project site would have adverse impacts including but not limited to, structural damage to the proposed building, cosmetic damage, accessibility issues and tripping hazards, and potential disruption of drainage patterns. **Mitigation Measure GEO-1**, which requires the proposed project to comply with the grading requirements as outlined in the CBC, would reduce impacts associated with subsidence and collapse to a less-than-significant level.

d. Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Expansive soils are primarily comprised of clay particles. Clay increases in volume when water is absorbed and shrinks when dry. Expansive soils can damage building foundations, concrete flatwork, and asphaltic concrete pavements as a result of swelling forces that reduce soil strength. According to the Imperial County Soil Survey (USDA 1981), Imperial soils have a high shrink-swell potential and Glenbar soils have a moderate shrink-swell potential due to the high clay content. Foundations require extra strength to withstand the stresses of shrinking and swelling. Therefore, the presence of expansive soils is considered a potentially significant impact.

Implementation of **Mitigation Measure GEO-2** would ensure that the project is designed and constructed to withstand the stresses of shrinking and swelling potentially occurring in association with the soils on the project site. With implementation of Mitigation Measure GEO-2, this impact would be less than significant.

e. Would the project 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?

The proposed project would utilize municipal utilities for disposal of wastewater; no septic tanks or alternative wastewater disposal systems are planned. Therefore, the proposed project would not result in impacts associated with soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. No mitigation is required.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Paleontological resources, or fossils, are the remains of extinct organisms and they provide the only direct evidence of ancient life. Section 02(8) of the Federal Land Policy and Management Act of 1976 mandates the treatment of paleontological resources as having scientific value. Scientifically significant paleontological resources are defined as vertebrate fossils that are identifiable to a particular taxon and/or element, noteworthy occurrences of invertebrate and plant fossils, and vertebrate trackways. In general, surface-disturbing activities, such as grading and excavation, have the potential to cause adverse effects on surface and subsurface paleontological resources. Direct impacts include destruction due to breakage and fragmentation. Indirect impacts may result from increased accessibility to paleontological resources resulting in an increased likelihood of looting or vandalism.

Geologic deposits at the surface of the project site consist of soil types that accumulated between the latest Pleistocene and late Holocene eras. Soils in the project area include Imperial silty clay, Imperial-Glenbar silty clay loam, and Meloland very fine sandy loam. These soils are not conducive to the preservation of fossil materials. Sedimentary deposits, such as the alluvium that underlies the project area, are considered to have low paleontological potential because the soil deposits are too recent to contain in-situ fossils. Project-related construction would not likely extend into any fossil-containing bedrock layers. However, the potential for the discovery of unknown paleontological resources cannot be completely discounted. **Mitigation Measure GEO-3** is required in the event that fossil resources are encountered during construction activities. Implementation of Mitigation Measure GEO-3 would reduce impacts to paleontological resources to less than significant.

### Mitigation Measures

**Mitigation Measure GEO-1:** Structures shall be designed by the engineer/architect in accordance with the seismic parameters presented in the applicable sections of the California Building Code (CBC) in effect at the time that the project is permitted. Design, grading, and construction shall be performed in accordance with the requirements of the CBC.

**Mitigation Measure GEO-2:** A site-specific geotechnical investigation shall be prepared for the project to determine the extent and effect of expansive soils. The proposed buildings shall be designed in accordance with recommendations of the geotechnical investigation addressing expansive soils.

**Mitigation Measure GEO-3:** If paleontological resources are encountered during the course of ground disturbance, work in the immediate area of the find shall be redirected and the District shall retain a qualified paleontologist to assess the find for scientific significance. If determined to be significant, the fossil shall be collected from the field. The paleontologist may also make recommendations regarding additional mitigation measures, such as paleontological monitoring. Scientifically significant resources shall be prepared to the point of identification, identified to the lowest taxonomic level possible, cataloged, and curated into the permanent collections of a museum repository. If scientifically significant paleontological resources are collected, a report of findings shall be prepared to document the collection.

## Greenhouse Gas Emissions

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? |  |  |  |  |
| 1. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? |  |  |  |  |

### Impact Analysis

a. Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Greenhouse gas emissions (GHGs) are present in the atmosphere naturally, and are released by natural sources, or are formed from secondary reactions taking place in the atmos­phere. However, over the last 200 years, human activities have caused substantial quantities of GHGs to be released into the atmos­phere. These extra emissions are increasing GHG concentrations in the atmosphere, and enhancing the natural greenhouse effect, which is believed to be causing global climate change. The gases that are widely seen as the principal contributors to human-induced global climate change are:

* Carbon dioxide (CO2)
* Methane (CH4)
* Nitrous oxide (N2O)
* Hydrofluorocarbons
* Perfluorocarbons
* Sulfur Hexafluoride

Certain gases, such as water vapor, are short-lived in the atmosphere. Others remain in the atmosphere for significant periods of time, contributing to climate change in the long term. Water vapor is excluded from the list of GHGs above because it is short-lived in the atmosphere and its atmospheric concentrations are largely determined by natural processes, such as oceanic evaporation.

These gases vary considerably in terms of Global Warming Potential (GWP), which is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and the length of time that the gas remains in the atmosphere (“atmospheric lifetime”).

The GWP of each gas is measured relative to CO2, the most abundant GHG; the definition of GWP for a particular GHG is the ratio of heat trapped by one unit mass of the GHG to the ratio of heat trapped by one unit mass of CO2 over a specified time period.

##### Construction Greenhouse Gas Emissions.

Construction activities associated with the proposed project, such as site preparation, site grading, on-site construction vehicles, equipment hauling materials to and from the project site, and motor vehicles transporting the construction crew would produce combustion emissions from various sources. During construction, GHGs would be emitted through the operation of construction equipment and from worker and builder supply vendor vehicles, each of which typically uses fossil-based fuels to operate. The combustion of fossil-based fuels creates GHGs such as CO2, CH4, and N2O. Furthermore, CH4 is emitted during the fueling of heavy equipment. Exhaust emissions from on-site construction activities would vary daily as construction activity levels change.

There is no threshold for construction-related activities. Using CalEEMod, it is estimated that construction of the proposed project would generate a total of approximately 357 metric tons of CO2 equivalents (CO2e). When considered over the 30-year life of the project, the total amortized construction emissions for the proposed project would be 11.9 metric tons of CO2e per year. As such, construction of the proposed project would not generate GHG emissions that would have a significant impact on the environment and construction-related impacts would be less than significant.

##### Operational Greenhouse Gas Emissions.

Long-term GHG emissions are typically generated from mobile, area, waste, and water sources as well as indirect emissions from sources associated with energy consumption. Mobile-source GHG emissions would include project-generated haul trips to and from the site. Area-source emissions would be associated with activities such as landscaping and maintenance on the project site. Energy source emissions are typically generated at off-site utility providers as a result of increased electricity demand generated by a project. Stationary source emissions would be associated with emergency backup generators. In addition, water source emissions associated with the proposed project are generated by water supply and conveyance and water distribution.

Operational emissions were estimated using CalEEMod and the results are presented in Table 5. CalEEMod output sheets are included in Appendix A.

| 1. Operational GHG Emissions | | | | | |
| --- | --- | --- | --- | --- | --- |
| Emissions Source Category | Operational Emissions (Metric Tons per Year) | | | | |
| CO2 | CH4 | N2O | CO2e | Percent of Total |
| Area | 0.0017 | 0.00 | 0.00 | 0.0018 | 0.00 |
| Energy | 43.59 | 0.0008 | 0.0008 | 43.85 | 19.4 |
| Mobile | 113.57 | 0.010 | 0.0080 | 116.19 | 51.5 |
| Waste | 24.81 | 1.47 | 0.00 | 61.46 | 27.2 |
| Water | 0.99 | 0.10 | 0.0024 | 4.25 | 1.9 |
| **Total Operational** | | | | **225.75** | **100.0** |
| Source: SSS (July 2022). | | | | | |

The proposed project would generate approximately 225.75 metric tons of CO2e per year of emissions, as shown in Table 5. The City of Calexico and the ICAPCD have not adopted quantitative significance thresholds for determination of whether a project would have a significant impact on the environment or conflict with an applicable GHG-reduction plan, policy, or regulation. For purposes of this analysis, project-generated emissions were evaluated based on CAPCOA’s recommended GHG threshold of 900 metric tons CO2e per year (MT CO2e/yr), as reflected in CAPCOA’s *CEQA and Climate Change* white paper.  Based on the emission estimates shown in Table 5, the proposed project would not result in the generation of substantial GHG emissions. As such, operation of the proposed project would not generate GHG emissions that would have a significant impact on the environment and construction-related impacts would be less than significant.

b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

The Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017 (CARB 2017), provides a framework for actions to reduce California’s GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs. The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations. Relatedly, in the Final Statement of Reasons for the Amendments to the CEQA Guidelines, the California Natural Resources Agency observed that “the [Scoping Plan] may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan” (CARB 2017). However, under the Scoping Plan there are several state regulatory measures aimed at the identification and reduction of GHG emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high Global Warming Potential GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., low-carbon fuel standard), among others. The project would comply with all applicable regulations adopted in furtherance of the Scoping Plan to the extent required by law.

Regarding consistency with post-2020 statewide targets, specifically Senate Bill 32 (goal of reducing GHG emissions to 40% below 1990 levels by 2030) and Executive Order S-3-05 (goal of reducing GHG emissions to 80% below 1990 levels by 2050), there are no established protocols or thresholds of significance for that future-year analysis. However, CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown. The Scoping Plan Second Update reaffirms that the state is on the path toward achieving the 2050 objective of reducing GHG emissions to 80% below 1990 after the adoption of Senate Bill 32 and Assembly Bill 197 in 2016.

As discussed previously, the project would generate minimal short-term GHG emissions and long-term operational GHG emissions. Operational GHG emissions would be considerably less than the CAPCOA GHG emissions threshold of 900 MT CO2e per year and as such, construction and operation of the project would not conflict with the state’s trajectory toward future GHG reductions. With respect to future GHG targets under Senate Bill 32 and Executive Order S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet the reduction targets in 2030 and in 2050. This legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets. Based on the preceding considerations, the project would not conflict with an applicable plan, policy, or regulation adopted to reduce the emissions of GHGs, and impacts would be less than significant.

## Hazards and Hazardous Materials

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials? |  |  |  |  |
| 1. 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? |  |  |  |  |
| 1. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school? |  |  |  |  |
| 1. 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? |  |  |  |  |
| 1. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area? |  |  |  |  |
| 1. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan? |  |  |  |  |
| 1. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires? |  |  |  |  |
| 1. Is the property line of the proposed school site less than the following distances from the edge of respective powerline easements: (1) 100 feet of a 50-133 kV line; (2) 150 feet of a 220-230 kV line; or (3) 350 feet of a 500-550 kV line? |  |  |  |  |
| 1. Is the proposed school site located near an aboveground water or fuel storage tank or within 1,500 feet of an easement of an aboveground or underground pipeline that can pose a safety hazard to the site? |  |  |  |  |
| 1. Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site? *(Does not apply to school sites approved by CDE prior to January 1, 1997.)* |  |  |  |  |
| 1. 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? |  |  |  |  |
| 1. If a response action is necessary and proposed as part of this project, has it been developed to be protective of children’s health, with an ample margin of safety? |  |  |  |  |

### Impact Analysis

a. Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Construction of the proposed project would require the transport and use of small quantities of hazardous materials in the form of gasoline, diesel, and oil. There is the potential for small leaks due to refueling of construction equipment; however, implementation of BMPs identified in construction specification plans would reduce the potential for accidental release of construction-related fuels and other hazardous materials. These BMPs would prevent, minimize, or remedy storm water contamination from spills or leaks, control the amount of runoff from the site, and require proper disposal and handling of hazardous materials.

Any on-site storage, transport, or use of hazardous materials during the operation of the proposed project would comply with local, state, and federal regulatory requirements.

Therefore, impacts associated with a potential hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant.

b. Would the project 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?

According to the Phase I Environmental Site Assessment and Title V Environmental Hazards Review (Padre Associates 2021), a review of historical aerial photographs indicates that many of the existing school buildings were constructed between the 1950s and the 1970s. Therefore, the potential for asbestos containing material (ACM) and lead-based paint (LBP) associated with existing building structures is considered a recognized environmental condition. Demolition of structures containing ACM and LBP would be a potentially significant impact. Implementation of **Mitigation Measure HAZ-1**, which requires survey of buildings potentially containing ACM and LBP and clean-up by qualified personnel, would reduce this impact to less than significant.

As discussed in the Phase I Environmental Site Assessment and Title V Environmental Hazards Review (Padre Associates 2021), the project site may potentially contain arsenic in soil from historic agricultural use; residual pesticides in soil from direct application of termiticides and/or ant control around the perimeters of building structures; residual lead in soil from the weathering of lead-based paint from building structures; and polychlorinated biphenyls (PCBs) in soil from weathering of caulking used in windowpanes containing PCBs, and PCBs in soil near pole- and pad-mounted electrical transformers.

The proposed project would require the excavation and transport of contaminated soils. Excavated soil would transported and disposed of by weight (i.e., tonnage). Cubic-yards of soil are converted to tons by multiplying the in-situ soil volume by an expansion factor of 1.1, and a conversion factor 1.5 to obtain the soil amount in tons.

Whereas:

* In-situ soil volume (cy) x 1.1 (expansion factor) x 1.5 (conversion factor) = tons
* 2,600 cubic yards x 1.1 (expansion factor) x 1.5 (conversion factor) = 4,290 tons.
* 4,290 tons ÷ 20 tons per load = 215 truckloads.

Until further testing of the soil has been completed, the planned excavated soil is anticipated to be disposed of as a hazardous waste. The South Yuma County Landfill located at 19536 South Avenue 1E, Yuma AZ 85365 is approximately 69 miles from the proposed project site and has been identified to accept and store and/or treat hazardous soil generated from the removal activities.

With implementation of **Mitigation Measure HAZ-2**, this impact would be less than significant.

c. Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

The project must comply with the California Education Code (including Section 17521, requiring the governing board of the school district to adopt a resolution in connection with consideration of proposal for occupancy of a building to be constructed on its property and to conduct a public meeting), and the California Code of Regulations (CCR), Title 5, Sections 14001 through 14012, which outlines the powers and duties and establishes standards with which the CDE, and all public school districts, must comply in the selection of new school sites.

See response 3.9.1(b). With implementation of **Mitigation Measure HAZ-2**, this impact would be less than significant.

Land uses surrounding the project site include residences, commercial, and school-related uses none of which handle or emit significant amounts of hazardous materials. Any future construction within one-quarter mile of the project site, which would take place after project implementation, would be subject to their own CEQA review.

Therefore, this impact would be less than significant.

d. Would the project 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?

According to the Department of Toxic Substances Envirostor website, the proposed project is located on a site that is included on a list of hazardous materials sites (school investigation site). With implementation of **Mitigation Measure HAZ-2**, the remediation action would be closed, and this impact would be less than significant.

e. Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

As discussed in the *Phase I Environmental Site Assessment and Title V Environmental Hazards Review* prepared for the project (Padre Associates 2021), Calexico International Airport is located 1.2 miles southwest of the project site. Based on review of the Calexico International Airport Compatibility Land Use Map (Imperial County 1996), the southwest corner of the project site may be within Zone C, which has limited risk, but prohibits the development of schools. Because Calexico High School is an existing facility, and the proposed project would not introduce new structures within the area designated as Zone C, this impact would be less than significant.

f. Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

The City of Calexico Safety Element of the General Plan addresses emergency operating procedures and evacuation routes for the General Plan area. Calexico is surrounded by open and unpopulated areas with two major evacuation routes (State Route [SR] 111 and SR 98) leading to Interstate 8 (1-8). The construction and operation of the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. In addition, the proposed project would comply with the Imperial County Emergency Plan, which addresses extraordinary emergency situations.

During both construction and operation, the project would be consistent with all local, state, and federal emergency procedures and guidelines. The project would not interfere with an adopted emergency response plan or emergency evacuation plan, and this impact would be less than significant.

g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The California Department of Forestry and Fire Protection (CALFIRE) developed Fire Hazard Severity Zones (FHSZ) for State Responsibility Areas (SRA) and Local Responsibility Areas (LRA). The project site is located in an unzoned LRA area. Therefore, the project would not result in exposure of people or structures to significant risk of loss injury or death as a result of wildland fire hazards.

h. Is the property line of the proposed school site less than the following distances from the edge of respective powerline easements: (1) 100 feet of a 50-133 kV line; (2) 150 feet of a220-230 kV line; or (3) 350 feet of a 500-550 kV line?

Pursuant to CCR, Title 5, Section 14010(c), the property line for a new school site shall not be the following minimum distances from the edge of a high-voltage power line easement: 100 feet for 50-133 kilovolt (kV) lines; 150 feet for 220-230 kV lines; and 350 feet for 500-550 kV lines. The existing school campus is surrounded by 12.5kV overhead distribution lines to the north, south, and east; however, the project site is not located within 100 feet from the edge of an easement for a 50-133 kV line; 150 feet from the edge of an easement for a 220-230kV line; or 350 feet from the edge of an easement for a 500-550kV line (Imperial Irrigation District 2021). Therefore, there are no CDE setback requirements for the project site. This impact would be less than significant.

*i. Is the proposed school site located near an aboveground water or fuel storage tank or within 1,500 feet of an easement of an aboveground or underground pipeline that can pose a safety hazard to the site?*

During the reconnaissance conducted on February 8, 2021, no aboveground water and/or fuel storage tanks were observed at or adjacent to the project site (Padre Associates 2021). There is a compressed natural gas (CNG) fueling station located at the school district’s Maintenance, Operations, and Transportation facility, located at 1085 Andrade Avenue. Reportedly the CNG storage tank has a capacity of 33.52-cubic feet. This facility is located adjacent to the project site at the northeast corner of the property parcel. The facility was constructed in 2004 and is owned by the District. The primary use of the facility is a fueling station for the District’s fleet of CNG powered school buses and other vehicles. The proposed project is a modernization project for an existing school campus. Because the proposed project would not site a new school within 1,500 feet of water/fuel storage tanks or pipelines, construction and operation of the project would result in a less-than-significant impact with regard to safety hazards.

j. Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site? (Does not apply to school sites approved by CDE prior to January 1, 1997.)

The project site is designated as Existing and Proposed Public Facility (PF) on the City of Calexico General Plan Land Use Map (City of Calexico 2015). Parcels surrounding the project site are designated as High-Density Residential, Commercial Highway Related, Commercial Office, Low-Density Residential, and Public Facility uses. This impact would be less than significant.

k. 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?

The Phase I ESA prepared for the project site found no evidence of the site having been used as a waste disposal site (Padre Associates 2021). No impact would occur.

l. If a response action is necessary and proposed as part of this project, has it been developed to be protective of children’s health, with an ample margin of safety?

As discussed in response 3.9.1(b), the project site had been constructed in the 1950s, and buildings proposed for demolition may contain ACM and/or LBP. With implementation of **Mitigation Measure HAZ-1**, which requires survey of buildings potentially containing ACM and LBP and clean-up by qualified personnel, would reduce this impact to less than significant. Additionally the project site had previously been under agricultural operation; however, the site has been tested for the presence of agricultural products. With implementation of **Mitigation Measure HAZ-2**, contaminated soils would be removed from the proposed project site, and this impact would be less than significant.

### Mitigation Measure

**Mitigation Measure HAZ-1:** Prior to demolition of any existing building on the project site, a lead-based paint (LBP) survey and an asbestos-containing materials (ACM) survey shall be completed to ensure proper removal and disposal. Removal of LBP and ACM material must be conducted by certified abatement specialists in compliance with applicable regulations. A copy of the completed survey and removal certification shall be provided to the District and DTSC prior to demolition activities.

**Mitigation Measure HAZ-2:** The waste material shall be profiled, and approval shall be received before soil is transported off-site for lawful disposition. The stockpiled soil shall be loaded into trucks, transported, and properly disposed of at an approved landfill. It is anticipated that the removed soil will be disposed of as hazardous waste.

Final determination of the disposal facility shall be based on approval from the landfill. Once the disposal facility is selected, copies of waste profile reports used to secure disposal permission from the landfill shall be provided to DTSC and included in the removal action completion report. In addition, compliance with the land disposal restrictions and land ban requirements for hazardous wastes shall be documented and provided once it is determined which disposal facility will be used.

## Hydrology and Water Quality

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality? |  |  |  |  |
| 1. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? |  |  |  |  |
| 1. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: |  |  |  |  |
| 1. Result in substantial erosion or siltation on- or off-site; |  |  |  |  |
| 1. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; |  |  |  |  |
| 1. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or |  |  |  |  |
| 1. Impede or redirect flood flows? |  |  |  |  |
| 1. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation? |  |  |  |  |
| 1. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? |  |  |  |  |

### Impact Analysis

a. Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Development of a property may result in two types of water quality impacts: (1) short-term impacts due to construction related discharges; and (2) long-term impacts from operation or changes in site runoff characteristics. Runoff may carry on-site surface pollutants to water bodies such as lakes, streams, and rivers that ultimately drain to the ocean. Projects that increase urban runoff may indirectly increase local and regional flooding intensity and erosion.

Non-stormwater discharges could result from activities such as discharge or accidental spills of hazardous substances such as fuels, oils, petroleum hydrocarbons, concrete, paints, solvents, cleaners, or other construction materials. Erosion and construction-related wastes have the potential to temporarily degrade existing water quality and beneficial uses by altering the dissolved oxygen content, temperature, pH, suspended sediment and turbidity levels, or nutrient content, or by causing toxic effects in the aquatic environment. Therefore, if uncontrolled, project-related construction activities could violate water quality standards.

Construction site stormwater management is enforced by the Colorado River Basin Regional Water Quality Control Board (RWQCB) in accordance with the State’s Water Quality Order 99-08-DWQ/NPDES General Permit No. CAS000002 (General Construction Permit). The RWQCB requires a National Pollutant Discharge Elimination System (NPDES) permit for construction activities that disturb 1 or more acres. The District would be required to comply with the Construction General Permit because project-related construction activities would result in soil disturbances of at least 1 acre of total land area. **Mitigation Measure HYD-1** requires the preparation and implementation of a SWPPP to comply with the Construction General Permit requirements.

With implementation of **Mitigation Measure HYD-1**, the project would not violate any water quality standards or waste discharge requirements (WDRs) during the construction period, and impacts would be less than significant.

b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The proposed project does not propose the installation of any water wells that would directly extract groundwater. Specifically, the proposed project includes connection to Calexico Water Department service. Additionally, the increase in impervious surface cover that would occur with the proposed project would be negligible and would not reduce the amount of water percolating down into the ground. Therefore, impacts to groundwater supplies or recharge would be less than significant.

c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

The proposed project would not alter the course of a stream or river. However, grading and development of the project site with the school buildings and walkways would substantially and permanently alter the on-site drainage pattern thereby increasing the potential for on-site and off-site erosion and sedimentation and increasing the amount of surface runoff through the addition of impervious surfaces.

Development of impervious surfaces incrementally reduces the amount of natural soil surfaces available for the infiltration of rainfall and runoff. As a result, the frequency, volume, and flow rate of stormwater runoff increases, potentially resulting in on-site flooding, downstream flooding, or potentially contributing to runoff that exceeds the capacity of the existing drainage system in the vicinity of the project site. The majority of the project site, much like its existing condition, would be covered by impervious surfaces in the form of building foundations, hardcourt areas and walkways. Landscaped areas and sports fields would be undeveloped and would provide infiltration of stormwater and reduce the volume of stormwater flowing off-site.

While the proposed amount of impervious surface would increase with the development of the proposed project, the drainage facilities that serve the project site would continue to provide storm drainage capacity for the project. Impacts associated with erosion or siltation would be less than significant.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

See response 3.10.1(c)(i).

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

See response 3.10.1(c)(i). Implementation of the proposed project would increase the amount of impervious surface within the project area; however, the project has been designed to accommodate stormwater without increasing the rate or amount of surface runoff in exceedance of the capacity of existing or planned stormwater drainage systems. This impact would be less than significant.

iv. Impede or redirect flood flows?

The proposed project area is located in an area designated as Zone X (Area of Minimal Flood Hazard) on the Federal Emergency Management Agency (FEMA) Flood Map 06025C2100C (effective 9/26/2008). Due to the location of the proposed project outside of a flood hazard zone, development of the proposed project is not anticipated to impede or redirect flood flows. This impact is considered less than significant.

d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?

The proposed project site is not located within a FEMA designated 100-year floodplain. In addition, the project site is generally level and is not immediately adjacent to any hillsides. As such, the risk from flooding would be low. Furthermore, no enclosed bodies of water are in close enough proximity that would create a potential risk for seiche or a tsunami at the project site. Therefore, there would be no impact related to potential hazards from inundation from flood, tsunami, or seiche.

e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Pollutants of concern during construction include sediment, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction. These pollutants may percolate to shallow groundwater from construction activities. However, required compliance with State and local regulations regarding stormwater and dewatering during construction would ensure that the proposed project would result in less-than-significant impacts to water quality during construction.

During operation of the proposed project, stormwater runoff would drain into the City’s drainage system. The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. This impact is considered less than significant.

### Mitigation Measures

**Mitigation Measure HYD-1:** Prior to ground-disturbing activities, the District shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies best management practices (BMPs) with the intent of keeping all products of erosion from moving offsite. The SWPPP shall include a site map that shows the construction site perimeter, existing and proposed man-made facilities, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. Additional the SWPPP shall contain a visual monitoring program and a chemical monitoring program for non-visible pollutants to be implemented (if there is a failure of BMPs). The requirements of the SWPPP and BMPs shall be incorporated into design specifications and construction contracts. Recommended BMPs for the construction phase may include the following:

* Stockpiling and disposing of demolition debris, concrete, and soil properly;
* Protecting any existing storm drain inlets and stabilizing disturbed areas;
* Implementing erosion controls;
* Properly managing construction materials; and
* Managing waste, aggressively controlling litter, and implementing sediment controls.

## Land Use and Planning

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Physically divide an established community? |  |  |  |  |
| 1. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? |  |  |  |  |

### Impact Analysis

a. Would the project physically divide an established community?

The project would be located on a parcel developed as an existing high school campus, which is surrounded by residential, commercial, and public facility uses. Connectivity between the project site and surrounding areas would be maintained, and no division of an established community would occur. Therefore, no impact would occur.

b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

The project site is zoned as Open Space and identified as an Existing and Proposed Public Facility use in the City of Calexico General Plan. The project does not propose to change the site’s existing zoning or land use designation. The proposed project would comply with applicable land use requirements, policies, zoning, and development standards as required by California law for school districts, and adhere to other applicable state codes and regulations.

The project site is not subject to a specific plan or local coastal program. For these reasons, the project would not conflict with any existing state, regional, county, or local laws, policies, regulations, plans or guidelines. Therefore, this impact would be less than significant.

## Mineral Resources

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state? |  |  |  |  |
| 1. 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? |  |  |  |  |

### Impact Analysis

a. Would the project result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

Industrial minerals such as sand, gravel, lime, gypsum, clay, stone, limestone, mica, tuff, salt, potash, calcium chloride, and kyanite have been historically mined in Imperial County, with some active mining activities still occurring (County of Imperial 2016). Sand and gravel resources are present in the region surrounding Calexico. The Calexico General Plan does not identify the presence of any mineral resources on lands affected by the proposed project. No active oil wells or natural resource extraction activities are located in the area where the proposed improvements would occur. Additionally, the project site is currently designated as Open Space (OS) in the City's Municipal Code and as Existing and Proposed Public Facility in the General Plan and is therefore not planned or zoned for mineral extraction.

Thus, the project would not result in the loss of availability of a known mineral resource that would be of value to the region or residents of the state. No impact would occur.

b. Would the project 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?

See response 3.12.1(a). No lands affected by the project are delineated as a locally important mineral resource recovery site. Therefore, the project would not 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 would occur.

## Noise

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project result in: |  |  |  |  |
| 1. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies? |  |  |  |  |
| 1. Generation of excessive groundborne vibration or groundborne noise levels? |  |  |  |  |
| 1. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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? |  |  |  |  |
| 1. Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the education program? |  |  |  |  |

### Impact Analysis

a. Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Noise is usually defined as unwanted sound. Noise consists of any sound that may produce physiological or psychological damage and/or interfere with communication, work, rest, recreation, or sleep. Several noise measurement scales exist that are used to describe noise in a particular location. A decibel (dB) is a unit of measurement that indicates the relative intensity of a sound. Sound levels in dB are calculated on a logarithmic basis. An increase of 10 dB represents a 10-fold increase in acoustic energy, while 20 dB is 100 times more intense and 30 dB is 1,000 times more intense. Each 10 dB increase in sound level is perceived as approximately a doubling of loudness; and similarly, each 10 dB decrease in sound level is perceived as half as loud. Sound intensity is normally measured through the A-weighted sound level (dBA). This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. The A-weighted sound level is the basis for 24-hour sound measurements that better represent human sensitivity to sound at night.

As noise spreads from a source, it loses energy so that the farther away the noise receiver is from the noise source, the lower the perceived noise level would be. Geometric spreading causes the sound level to attenuate or be reduced, resulting in a 6 dB reduction in the noise level for each doubling of distance from a single point source of noise to the noise sensitive receptor of concern.

There are many ways to rate noise for various time periods, but an appropriate rating of ambient noise affecting humans also accounts for the annoying effects of sound. Equivalent continuous sound level (Leq) is the total sound energy of time varying noise over a sample period. However, the predominant rating scales for human communities in the State of California are the Leq, the community noise equivalent level (CNEL), and the day-night average level (Ldn) based on dBA. CNEL is the time varying noise over a 24-hour period, with a 5 dBA weighting factor applied to the hourly Leq for noises occurring from 7:00 p.m. to 10:00 p.m. (defined as relaxation hours) and 10 dBA weighting factor applied to noise occurring from 10:00 p.m. to 7:00 a.m. (defined as sleeping hours). Ldn is similar to the CNEL scale, but without the adjustment for events occurring during the evening relaxation hours. CNEL and Ldn are within one dBA of each other and are normally exchangeable. The noise adjustments are added to the noise events occurring during the more sensitive hours.

A project would have a significant noise effect if it would substantially increase the ambient noise levels for adjoining areas or conflict with adopted environmental plans and goals of applicable regulatory agencies, including, as appropriate, the City of Calexico.

As required in Chapter 8.46, Noise Ordinance, of the Calexico Municipal Code, construction activities would be limited to between the hours of 8:00 a.m. and 5:00 p.m. daily, and the use of mufflers or sound dissipative devices for internal combustion engines is required to reduce noise levels associated with construction activities. Because of the effects of noise attenuation, the distance from the noise source to a receptor is a primary consideration in determining the noise level experienced at the receptor.

Certain land uses are considered more sensitive to noise than others. Examples of these sensitive land uses include residential areas, educational facilities, hospitals, childcare facilities, and senior housing. The proposed project site is surrounded by residential uses to the north, south, east, and west beyond E. Birch Street, E. Belcher Street, Andrade Avenue, and Encinas Avenue, respectively.

##### Short-Term (Construction) Noise Impacts.

Project construction would result in short-term noise impacts on the nearby sensitive receptors. Maximum construction noise would be short-term, generally intermittent depending on the construction phase, and variable depending on receiver distance from the active construction zone. The duration of noise impacts generally would be from one day to several days depending on the phase of construction. The level and types of noise impacts that would occur during construction are described below.

Short-term noise impacts would occur during grading and site preparation activities. Table 6 lists typical construction equipment noise levels (Lmax) recommended for noise impact assessments, based on a distance of 50 feet between the equipment and a noise receptor, obtained from the Federal Highway Administration (FHWA) Roadway Construction Noise Model. Construction-related short-term noise levels would be higher than existing ambient noise levels currently in the project area but would no longer occur once construction of the project is completed.

| 1. Typical Construction Equipment Noise Levels | | |
| --- | --- | --- |
| Equipment Description | Acoustical Usage Factor  (%) | Maximum Noise Level  (Lmax) at 50 Feet1 |
| Backhoes | 40 | 80 |
| Compactor (ground) | 20 | 80 |
| Compressor | 40 | 80 |
| Cranes | 16 | 85 |
| Dozers | 40 | 85 |
| Dump Trucks | 40 | 84 |
| Excavators | 40 | 85 |
| Flat Bed Trucks | 40 | 84 |
| Forklift | 20 | 85 |
| Front-end Loaders | 40 | 80 |
| Graders | 40 | 85 |
| Impact Pile Drivers | 20 | 95 |
| Jackhammers | 20 | 85 |
| Pick-up Truck | 40 | 55 |
| Pneumatic Tools | 50 | 85 |
| Pumps | 50 | 77 |
| Rock Drills | 20 | 85 |
| Rollers | 20 | 85 |
| Scrapers | 40 | 85 |
| Tractors | 40 | 84 |
| Welder | 40 | 73 |
| Source: Roadway Construction Noise Model (FHWA 2006).  Note: Noise levels reported in this table are rounded to the nearest whole number.  1 Maximum noise levels were developed based on Spec 721.560 from the Central Artery/‌Tunnel (CA/T) program to be consistent with the City of Boston’s Noise Code for the “Big Dig” project.  Lmax = maximum instantaneous sound level | | |

Two types of short-term noise impacts could occur during construction of the proposed project. The first type involves construction crew commutes and the transport of construction equipment and materials to the sites, which would incrementally increase noise levels on roads leading to the sites. As shown in Table 6, there would be a single-event noise exposure potential at a maximum level of 55 dBA Lmax with trucks passing at 50 feet.

The second type of short-term noise impact is related to noise generated during grading and construction on the project site. Construction is performed in discrete steps, or phases, each with its own mix of equipment and, consequently, its own noise characteristics. These various sequential phases would change the character of the noise generated on site. Therefore, the noise levels vary as construction progresses. Despite the variety in the type and size of construction equipment, similarities in the dominant noise sources and patterns of operation allow construction-related noise ranges to be categorized by work phase.

Typical maximum noise levels range up to 87 dBA Lmax at 50 feet during the noisiest construction phases. The site preparation phase, including excavation and grading of the site, tends to generate the highest noise levels because earthmoving machinery is the noisiest construction equipment. Earthmoving equipment includes excavating machinery such as backfillers, bulldozers, draglines, and front loaders. Earthmoving and compacting equipment includes compactors, scrapers, and graders. Typical operating cycles for these types of construction equipment may involve 1 or 2 minutes of full-power operation followed by 3 or 4 minutes at lower power settings.

This analysis assumes that a bulldozer, dump truck, and backhoe would be operating simultaneously during construction of the project. Based on the typical construction equipment noise levels shown in Table 6, noise levels associated with a bulldozer, dump truck, and backhoe operating simultane­ously would be approximately 88 dBA Lmax at 50 feet.

As noted above, the project is surrounded by residential uses beyond area roadways. It is anticipated that construction activities would occur as close as 75 feet to nearby residences. Construction noise is permitted by the City of Calexico when activities occur between the hours of 8:00 a.m. and 5:00 p.m. daily, and the use of mufflers or sound dissipative devices for internal combustion engines is required to reduce noise levels associated with construction activities. Because construction activities would comply with the City of Calexico Municipal Code, this impact would be less than significant.

##### Operational Noise Impacts.

A significant impact would occur if the project would exceed established standards, including resulting in a substantial permanent increase in ambient exterior noise levels above levels existing without the project. In acoustics, every doubling of an equal sound energy would result in a 3 dBA increase in combined noise level (an increase of 3 dBA represents the lowest noise increase that is perceptible by humans outside of a laboratory environment). For the purposes of this analysis, an increase of 5 or more dBA would be significant.

Permanent increases in the ambient noise level in the project vicinity would result from vehicle noise associated with school traffic and maintenance activities. However, it should be noted that the proposed project would expand and modernize the existing campus and noise levels are expected to be consistent with existing conditions.

The proposed school would be exposed to noise levels associated with traffic on E. Birch Street, E. Belcher Street, Andrade Avenue, and Encinas Avenue. Given the distance of the proposed classrooms from the centerline and the volumes of traffic on E. Birch Street, E. Belcher Street, Andrade Avenue, and Encinas Avenue, traffic noise from adjacent roads would have a less-than-significant impact on the school.

**Landscape Maintenance**

Mowers, blowers, weed cutters, and tractors would be operated onsite to maintain the project landscaping. Landscape maintenance would occur between the hours of 8:00 a.m. to 5:00 p.m. Monday through Friday, consistent with the City’s Noise Ordinance; therefore, this impact would be less than significant.

b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?

Construction activities that might expose persons to excessive ground borne vibration or ground borne noise have the potential to cause a significant impact. Ground borne vibration information related to construction/heavy equipment activities has been collected by the California Department of Transportation (Caltrans). The Caltrans data indicates that transient vibrations (such as from demolition activity) with a peak particle velocity (PPV) of approximately 0.035 inches per second may be characterized as barely perceptible, and vibration levels up to 0.25 inches per second may be characterized as distinctly perceptible (Caltrans 2013). Caltrans (2013) uses a damage threshold of 0.2 inches per second PPV for conventional buildings.

Ground borne vibration is typically attenuated over relatively short distances. With the anticipated construction equipment, construction-related vibration levels would be approximately 0.127 inches per second PPV at 25 feet from the construction area (assuming simultaneous operation of a caisson drill, a jackhammer, and a small bulldozer). At 25 feet, this vibration would be above the threshold of “barely perceptible” level of 0.035 inches per second PPV; however, the nearest residence is approximately 100 feet from the nearest construction area. At a distance of 100 feet, the vibration level is not anticipated to exceed the distinctly perceptible level of 0.25 inches per second PPV (Caltrans 2013). The expected vibration level at the residential buildings is also expected to be below the Caltrans damage threshold for conventional buildings. Therefore, impacts related to ground borne vibration would be less than significant.

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?

As discussed in the *Phase I Environmental Site Assessment and Title V Environmental Hazards Review* prepared for the project (Padre Associates 2021), Calexico International Airport is located 1.2 miles southwest of the project site. Because Calexico High School is an existing facility, and ambient noise levels are not expected to result in a noticeable change, the proposed project would not expose people working or attending school on the project site to excessive noise levels; this impact would be less than significant.

d. Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the education program?

See response 3.13.1(a). The school would continue to be exposed to noise levels associated with traffic on E. Birch Street, E. Belcher Street, Andrade Avenue, and Encinas Avenue. The nearest proposed classroom would be approximately 160 feet from the centerline of E. Birch Street, 100 feet from the centerline of E. Belcher Street, 640 feet from the centerline of Andrade Avenue, and 240 feet from the centerline of Encinas Avenue (as measured from the nearest proposed building). Given the distance of the site from the centerline and the volumes of traffic on E. Birch Street (22,800 vehicles per day) (Caltrans 2017), E. Belcher Street, Andrade Avenue, and Encinas Avenue (8,968 vehicles per day) (KOA 2021), traffic noise from adjacent roads would have a less-than-significant impact on the school.

## Population and Housing

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Induce substantial unplanned 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)? |  |  |  |  |
| 1. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere? |  |  |  |  |

### Impact Analysis

a. Would the project induce substantial unplanned 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)?

The project does not include the construction of dwellings or an increase in the resident population of the surrounding area. Project implementation would meet the demands of projected population growth in the project area by providing accommodation for students. As such, the project would have no impact on direct or indirect population growth.

b. Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

The project site is currently developed as the existing Calexico High School campus; therefore, no dwelling units would be displaced from project implementation. The project would have no impact.

## Public Services

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. 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: |  |  |  |  |
| 1. Fire protection? |  |  |  |  |
| 1. Police protection? |  |  |  |  |
| 1. Schools? |  |  |  |  |
| 1. Parks? |  |  |  |  |
| 1. Other public facilities? |  |  |  |  |
| 1. Does the site promote joint use of parks, libraries, museums, and other public services? |  |  |  |  |

### Impact Analysis

a. 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:

i. Fire protection?

The proposed project would be served by the Calexico Fire Department (CFD) (430 E. Fifth Street) approximately 0.5 mile southwest of the project site.

The CFD would provide fire protection services to the project site. The project would incorporate California Fire Code requirements into project designs. These standards address access road length, dimensions, and finished surfaces for firefighting equipment; fire hydrant placement; fire flow availability and requirements; and plan submittal requirements. In addition, the California Fire Code requires that every public or private school building having an occupant load of 50 or more students or more than one classroom have an automatic fire alarm system using the California Fire Code Signal outlined in the California Education Code (Sections 32000–32004). Furthermore, the California Education Code requires new schools to install an automatic fire sprinkler system (Section 17074.52).

Incorporation of all California Fire Code requirements into project designs would reduce the dependence on fire department equipment and personnel by reducing fire hazards. Therefore, the proposed project would not affect the CFD’s response times or other performance objectives and would not cause in the construction of new or expansion of existing fire protection facilities that result in environmental effects. The impacts on fire protection services would be less than significant.

ii. Police protection?

The project would also be served by the Calexico Police Department (420 E. Fifth Street) approximately 0.5 mile southwest of the project site.

The site would be lit at night for security purposes as a way to discourage crime. It is not expected that the proposed project would substantially increase the Calexico Police Department’s calls for service. Therefore, the proposed project would not affect the Calexico Police Department’s performance objectives and would not cause the construction of new or expansion of existing police protection facilities that result in environmental effects. Therefore, the project would have a less than significant impact.

iii. Schools?

The project would not increase the demand for or cause a shortfall of school services or facilities. Rather, the proposed project would continue to accommodate students living in the attendance area. Therefore, the project would have no impact.

1. Parks?

The proposed project does not include the construction of structures that would increase the population in the area or that would generate a higher demand for parks or other public facilities. Therefore, the demand for parks for the project would be the same as under existing conditions. No impact to parks would occur.

v. Other public facilities?

The proposed project does not include the construction of structures that would increase the population in the area or that would generate a higher demand for other public facilities. Therefore, the demand for public facilities for the project would be the same as under existing conditions. No impact to public facilities would occur.

b. Does the site promote joint use of parks, libraries, museums, and other public services?

The Civic Center Act, as defined in the State of California Education Code Sections 38130-38139, describes the uses of school facilities, including all buildings and grounds for public purposes, and the fees that may be assessed. Section 38131(b)(1) states:

“(b) The governing board of any school district may grant the use of school facilities or grounds as a civic center upon the terms and conditions the board deems proper, subject to the limitations, requirements, and restrictions set forth in this article, for any of the following purposes:(1) Public, literary, scientific, recreational, educational, or public agency meetings . . .(6) Supervised recreational activities including, but not limited to, sports league activities for youths that are arranged for and supervised by entities, including religious organizations or churches, and in which youths may participate regardless of religious belief or denomination” (California Education Code 1996).

The proposed site would be available for use per Civic Center Act requirements. Therefore, the project does not preclude the joint use of athletic facilities located onsite or the use of buildings for public agency meetings. This impact would be less than significant.

## Recreation

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| 1. 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? |  |  |  |  |
| 1. 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? |  |  |  |  |

### Impact Analysis

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?

The increase in use of recreational facilities is generally a result of population growth. The proposed project includes the modernization of an existing middle school campus. The project would serve the region’s existing population and would not induce population growth. Therefore, there would be no impact on existing neighborhood or regional parks and facilities.

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?

The project would not directly or indirectly result in population and housing growth. Therefore, it would not impact existing neighborhood and regional parks or other recreational facilities as a result of substantial physical deterioration of the facilities. Furthermore, the project does not include the development of recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environmental. No impact would occur.

## Transportation

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities? |  |  |  |  |
| 1. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)? |  |  |  |  |
| 1. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? |  |  |  |  |
| 1. Result in inadequate emergency access? |  |  |  |  |
| 1. Is the proposed school site within 1,500 feet of a railroad track easement? |  |  |  |  |
| 1. Is the site easily accessible from arterials and is the minimum peripheral visibility maintained for driveways per Caltrans' Highway Design Manual? |  |  |  |  |
| 1. Are traffic and pedestrian hazards mitigated per Caltrans' School Area Pedestrian Safety manual? |  |  |  |  |

### Impact Analysis

a. Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

The Calexico Unified School District contracted with KOA to prepare a focused traffic study for the proposed project.

The KOA study noted that currently the Calexico Transit System, a local private transit operator that previously operated two lines (Line 1 and 2) within the City of Calexico is no longer in service throughout the whole city. Imperial Valley Transit (IVT) provides local and regional services in Imperial County. None of the IVT transit services operate within the study area. The proposed project would not conflict with existing transit service.

Additionally, the proposed project would not obstruct existing bicycle and pedestrian facilities near the proposed project site. This impact would be less than significant.

b. Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?

On September 27, 2013, Governor Jerry Brown signed SB 743 into law and started a process that changes the methodology of a transportation impact analysis as part of CEQA requirements. SB 743 directed the California Office of Planning and Research to establish new CEQA guidance for jurisdictions that removes the level of service (LOS) method, which focuses on automobile vehicle delay and other similar measures of vehicular capacity or traffic congestion, from CEQA transportation analysis.

Rather, vehicle miles traveled (VMT), or other measures that promote “the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses,” are now be used as the basis for determining significant transportation impacts in the State.

The guidance indicates that K-12 school, local park, and day care center projects located in a Transit Priority Areas and projects located in a low-VMT generating area would result in a less than significant impact. Additionally, the project does not result in an increase in students but rather reflects a 1-2 block change in destination for the 9th grade students. Future students are likely to have similar travel patterns as current students, further strengthening the conclusion that the project would result in no net change to the total vehicle miles traveled.

Based on this assessment, the proposed campus modernization can be classified as a local-serving land use and as having no net change in VMT. Based on the previously summarized standards, the proposed project would result in a less-than-significant VMT impact.

c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

The proposed project would have three access driveways to the school. The main ingress/egress to the school would be located on the east side of Encinas Avenue and represents the gateway to the Calexico High School. This access would lead to two student parking lots on each side of the main entrance path. This circular driveway access would be designed to allow for a safe and smooth flow of traffic while dropping off and picking up students. The other two access driveways would be for the parking lots located on Encinas Avenue and E. Belcher Street. The Encinas parking lot, located north of the main school entrance would be designated for the teachers.

As a result of the City of Calexico’s proposed improvements to Encinas Avenue, including the installation of a raised center median, access to the project driveways would be restricted to right-turn in and right-turn out movements only. Vehicles would approach the project site from both the north and the south and exit to the north along northbound Encinas Avenue. All vehicles traveling on northbound Encinas Avenue would enter the project site by making a right-turn into the project site; vehicles arriving from the north would continue south past the project site and make a U-turn at Ethel Avenue. Furthermore, vehicles arriving from the south are assumed to leave the site via a right turn onto Encinas Avenue, and then proceed to make either right or left on E. Birch Street.

As the project would comply with DSA design standards, it would not include any design features that would create traffic hazards. Additionally, there are no incompatible uses, including farm operations, in the vicinity that would cause traffic hazards.

The school would include an internal pedestrian pathway system. School development would not create barriers to pedestrians or bicyclists.

All new driveway construction would be subject to approvals by the DSA. Through DSA plan check reviews, the project would comply with all regulations regarding roadway design, thus minimizing any potential impacts from traffic safety hazards. Project impacts would be less than significant.

d. Would the project result in inadequate emergency access?

Project parking lots and vehicular routes, including emergency vehicle access, would be provided near all proposed buildings on-site, according to the proposed project site plan. Emergency access would not be adversely affected as a result of the project.

Construction of the project would temporarily generate additional traffic on the existing area roadway network. These vehicle trips would include construction workers traveling to the site as well as delivery trips associated with construction equipment and materials. Delivery of construction materials to the site may require oversized vehicles that may travel at slower speeds than existing traffic, thereby causing minor delays on local roadways on a temporary, intermittent basis.

Lane closures are not anticipated, and no off-site roadway improvements would be required that would have the potential to interrupt area circulation or redirect traffic. As such, project construction is not anticipated to substantially disrupt area traffic or cause a significant increase in daily traffic on area roadways or at local intersections.

All proposed access routes would be designed consistent with City design standards for emergency access and would adequately accommodate the on-site maneuvering of emergency vehicles. The project is therefore not anticipated to interfere with emergency access. Impacts would be less than significant.

e. Is the proposed school site within 1,500 feet of a railroad track easement?

As discussed in response 3.3.1(f), the project area is located approximately 0.8 mile northeast of the existing Union Pacific line. The project site is not located within 1,500 feet of a railroad track easement. No impact would occur.

f. Is the site easily accessible from arterials and is the minimum peripheral visibility maintained for driveways per Caltrans' Highway Design Manual?

The primary access to the project site would continue to be provided on Encinas Avenue, located along the western boundary of the site. As no changes to existing streets are proposed and the location of access driveways would be consistent with existing site driveways, impacts related to access and peripheral visibility would be less than significant.

g. Are traffic and pedestrian hazards mitigated per Caltrans' School Area Pedestrian Safety manual?

Currently, sidewalks exist in the vicinity of the proposed project site along E. Birch Street, E. Belcher Street, Andrade Avenue, and Encinas Avenue, and crosswalks are located at the Encinas Avenue/Linda Street, Encinas Avenue/E. Belcher Street, and Encinas Avenue/E. Birch Street intersections and along Encinas Avenue approximately 350 south of Linda Street. The proposed project does not include modification to existing pedestrian facilities; therefore, this impact would be less than significant.

## Tribal Cultural Resources

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: |  |  |  |  |
| 1. 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 Section 5020.1(k)? Or |  |  |  |  |
| 1. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe. |  |  |  |  |
|  |  |  |  |  |

### Impact Analysis

a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

i. 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 Section 5020.1(k)? Or

The District requested a Sacred Lands Inventory on file with the Native American Heritage Commission (NAHC), which concluded *posi*tive results. NAHC indicated the District should contact the Torres-Martinez Desert Cahuilla Indians for additional information. Based on the list provided by the NAHC, on May 25, 2021, the District notified 24 Native American tribal representatives consistent with AB 52 requirements; Two responses have been received. However, in the unlikely event that unrecorded resources are discovered during construction activities, compliance with the California Public Resources Code would reduce this potential impact to less than significant.

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

The District requested a Sacred Lands Inventory on file with the Native American Heritage Commission (NAHC), which concluded *posi*tive results. NAHC indicated the District should contact the Torres-Martinez Desert Cahuilla Indians for additional information. Based on the list provided by the NAHC, on May 25, 2021, the District notified 24 Native American tribal representatives consistent with AB 52 requirements; Two responses have been received. However, in the unlikely event that unrecorded resources are discovered during construction activities, compliance with the California Public Resources Code would reduce this potential impact to less than significant.

## Utilities and Service Systems

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| Would the project: |  |  |  |  |
| 1. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects? |  |  |  |  |
| 1. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years? |  |  |  |  |
| 1. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments? |  |  |  |  |
| 1. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals? |  |  |  |  |
| 1. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste? |  |  |  |  |

### Impact Analysis

a. Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

The proposed project would not require the relocation or construction of new or expanded water, wastewater, electric power, natural gas, or telecommunications facilities. This impact would be less than significant.

b. Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

The proposed project would include modernization features for the existing school campus. This would include the installation of water conserving toilets and irrigation. While the proposed project would accommodate an increase in the student population on campus, the project involves relocating the 9th grade students from the 9th grade campus at 824 Blair Avenue. The proposed project is not expected to exceed the current water usage. This impact would be less than significant.

c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project’s projected demand in addition to the provider’s existing commitments?

The proposed project would include modernization features for the existing school campus. While the proposed project would accommodate an increase in the student population on campus, the project involves relocating the 9th grade students from the 9th grade campus at 824 Blair Avenue. The proposed project is not expected to exceed the current wastewater treatment requirements. This impact would be less than significant.

d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Project construction would involve site clearing and the generation of various construction wastes, including scrap lumber, scrap finishing materials, various scrap metals, and other recyclable and nonrecyclable construction-related wastes. The 2019 CALGreen Code (Title 24, Part 11 of the California Code of Regulations) requires all construction contractors to reduce construction waste and demolition debris by 65 percent. Code requirements include preparing a construction waste management plan that identifies the materials to be diverted from disposal by efficient usage, recycling, reuse on the project, or salvage for future use or sale; determining whether materials will be sorted on-site or mixed; and identifying diversion facilities where the materials collected will be taken. The code also specifies that the amount of materials diverted should be calculated by weight or volume, but not by both (California Building Standards Commission 2019). In addition, the 2019 CalGreen Code requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing be reused or recycled.

Additionally, project operation would result in long-term generation of solid waste, consistent with the existing solid waste generation rates at the project site.

The project would comply with all statues and regulations related to solid waste. Compliance with the CalGreen Code and Assembly Bill 1826 would ensure that sufficient landfill capacity would be available to accommodate solid-waste disposal needs for future development. Therefore, the project would have a less-than-significant impact.

e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

The California Integrated Waste Management Act of 1989 (AB 939) redefined solid waste management in terms of both objectives and planning responsibilities for local jurisdictions and the state. AB 939 was adopted in an effort to reduce the volume and toxicity of solid waste that is landfilled and incinerated, by requiring local governments to prepare and implement plans to improve the management of waste resources. AB 939 required each of the cities and unincorporated portions of the counties throughout California to divert a minimum of 25 percent of the solid waste sent to landfills by 1995 and 50 percent by the year 2000. To attain goals for reductions in disposal, AB 939 established a planning hierarchy using new integrated solid waste management practices.

Section 5.408 of the 2019 California Green Building Standards Code (Title 24, California Code of Regulations, Part 11) requires that at least 50 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Any businesses, including public entities, generating four cubic yards or more of commercial solid waste per week, must arrange recycling services.

The project would comply with AB 939 (Zero Waste program) and other applicable local, State, and federal solid waste disposal standards, thereby ensuring that the solid waste stream to regional landfills is reduced in accordance with existing regulations. Therefore, this impact would be less than significant.

## Wildfire

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project: |  |  |  |  |
| 1. Substantially impair an adopted emergency response plan or emergency evacuation plan? |  |  |  |  |
| 1. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire? |  |  |  |  |
| 1. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment? |  |  |  |  |
| 1. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes? |  |  |  |  |

### Impact Analysis

a. Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?

Wildland fires occur in geographic areas that contain the types and conditions of vegetation, topography, weather, and structure density susceptible to risks associated with uncontrolled fires that can be started by lightning, improperly managed camp fires, cigarettes, sparks from automobiles, and other ignition sources.

According to the California Department of Forestry and Fire Protection Very High Fire Hazard Severity Zone (VHFHSZ) Map for Imperial County, the project site is not located in a high risk area and rather is located in an unzoned Local Responsibility area. Therefore, the proposed project would not expose people to significant risk of loss, injury, or death due to wildland fires and this impact would be less than significant.

As discussed in response 3.9.1(f), implementation of the proposed project would not interfere with an adopted emergency response plan or emergency evacuation plan and would not alter any of the streets within, or adjacent to, the project site. Therefore, implementation of the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan and impacts would be less than significant.

b. Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

The project site is not located in or near a VHFHSZ nor is it located in or near an SRA. Therefore, implementation of the proposed project would not exacerbate wildfire risks due to slope and prevailing winds, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. As a result, a less-than-significant impact would occur, and no mitigation would be required.

c. Would the project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

The proposed project would not require the installation or maintenance of infrastructure that may exacerbate fire risk. No impact would occur.

d. Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking but can also occur as a result of erosion and downslope runoff caused by rain following a fire. Because the proposed project site is level, the proposed project would not expose people or structures to potential substantial adverse effects associated with landslides. Further, the proposed project site is not located in or near a VHFHSZ nor is it located in or near a SRA. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. As a result, a less-than-significant impact would occur, and no mitigation would be required.

## Mandatory Findings of Significance

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
|  | Potentially Significant Impact | Less Than Significant with Mitigation Incorporated | Less Than Significant Impact | No Impact |
| 1. Does the project have the potential to substantially 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, substantially 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? |  |  |  |  |
| 1. 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.) |  |  |  |  |
| 1. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly? |  |  |  |  |

### Impact Analysis

a. Does the project have the potential to substantially 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, substantially 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?

Implementation of the mitigation measures recommended in this IS/MND would ensure that construction and operation of the proposed project would not substantially degrade the quality of the environment; reduce the habitat, population, or range of a plant or animal species; or eliminate important examples of California history or prehistory.

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)?

The potential impacts of the proposed project are individually limited and are not cumulatively considerable. Implementation of mitigation measures recommended in this report would reduce potentially significant impacts that could become cumulatively considerable.

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

The proposed project would be constructed and operated in accordance with all applicable regulations governing hazardous materials, noise, and geotechnical considerations. Because all potentially significant impacts of the proposed project are expected to be mitigated to less-than-significant levels, it is unlikely that implementation of the proposed project would cause substantial adverse effects on human beings. As a result, less-than-significant impacts would occur with implementation of the recommended mitigation measures.

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**APPENDIX F**