

Attachment
Temecula Valley Unified School District
Categorical Exemption Evaluation Report
Temecula Valley High School (TVHS) Hillside Agriculture Project
October 2022

Temecula Valley Unified School District (District) proposes the TVHS Hillside Agriculture Project (project). This Categorical Exemption Evaluation Report (CE Evaluation) documents the eligibility of the project as exempt from expanded environmental review pursuant to the California Environmental Quality Act (CEQA), under Public Resources Code Section 21084 and California Code of Regulations, Title 14 (CEQA Guidelines) Sections 15061(b)(2) and 15300 et seq.

The project involves an approximately 8.5-acre hillside area of TVHS located at 31555 Rancho Vista Road, in the southern region of the City of Temecula (Assessor's Parcel Number [APN] 955-020-001); refer to Exhibit 1, Local Vicinity. The project site was previously graded when TVHS was constructed and is presently composed of undeveloped vegetated hillside, ranging from 1,185-feet above mean sea level (AMSL) near the perimeter to 1,285 AMSL near the center of the project site.¹ Based on a biological resources assessment conducted on February 10, 2021, the site contains California buckwheat scrub, non-native grasses, and ornamental and disturbed vegetation intersected by a matrix of unvegetated dirt paths.² Several areas of the project site are used for outdoor materials storage of maintenance supplies. Discarded wood/palm frond piles are dispersed throughout. Four mature pine trees (*Pinus* sp.) are located at the northwest perimeter of the project site and a single native blue elderberry tree (*Sambucus nigra* ssp. *caerulea*) is located in the central portion of the project site. The site does not support sensitive, threatened, or endangered plant species or communities.

The project area would be converted to support agricultural uses, including olive trees, grape vineyards, a culinary garden, as well as native plants to support local pollinators; refer to Exhibit 2, Conceptual Site Plan. The area would allow TVHS students to learn about these major economic assets of the Temecula Valley area.

First, minor grading would occur throughout the project perimeter to clear and prepare the site and create a more manageable slope. Fencing would be installed around each agricultural use. These activities are expected to take up to eight weeks. Next, drip irrigation would be installed within the project site by connecting to an existing 2-inch water line that services school baseball fields to the north of the project site. Irrigation installation is expected to take up to two weeks. Finally, shovels and augers would be used to dig holes and plant the crops. The planning process is expected to occur over approximately two weeks, but could be longer depending on weather and work force availability. Project construction would not involve tree removal activities. Perimeter control construction stormwater best management practices

¹ Osprey Environmental Associates, *2021 Focused Quino Checkerspot Butterfly Survey Report for the Temecula Valley High School Regenerative Agriculture Project*, City of Temecula, California, June 22, 2021.

² CADRE Environmental, *Biological Resources Habitat Assessment and Constraints Analysis for the 8.50-Acre Temecula Valley High School Study Area*, City of Temecula, Western Riverside County, California, February 10, 2021.

(BMPs) would include installation of gravel bag berms, cross bars, fiber rolls, and storm drain inlet protection prior to ground disturbing activities.

Site maintenance and harvesting operations would occur on a daily and weekly basis and would be conducted using hand tools. No heavy machinery would be required, except for occasional use of a small tractor for transporting harvested produce. The project would install post-construction stormwater BMPs such as vegetative cover, swales, straw wattles, and water diversion bars.

This analysis documents the project's eligibility as an exempt action under CEQA Class 4 Categorical Exemption for Minor Alterations to Land pursuant to CEQA Guidelines Section 15304. Pursuant to CEQA Guidelines Section 15304, the Class 4 exemption allows for minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes.

CEQA Guidelines Section 15300.2 identifies the following exceptions to the use of a categorical exemption:

- a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located—a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply in all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, State, or local agencies.
- b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.
- c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
- d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including, but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a State scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.
- e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.
- f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

As evaluated below, none of the above exceptions apply to the proposed project. Therefore, the District, as CEQA lead agency is not precluded from categorically exempting the proposed project from CEQA.

- a) Location. The project site is located on an undeveloped portion of TVHS. The site is bordered by baseball fields to the north, undeveloped vegetative land to the east, Pauba Road and residential homes to the south, and a parking lot and Margarita Road to the west. The biological studies prepared for the project demonstrate that the project site is not located in a sensitive environment. No sensitive, threatened, or endangered plant species or communities were found. Additionally, no vernal pool resources were documented as part of the project's biological studies. Due to suitable habitat, focused Quino checkerspot butterfly (*Euphydryas editha quino*) surveys

were conducted, in which no Quino checkerspot butterflies were observed.³ Focused surveys for the coastal California gnatcatcher (*Polioptila californica californica*) were also conducted due to suitable habitat, but none were observed.⁴ Thus, the project would not impact sensitive habitats and exception (a) would not apply.

- b) Cumulative Impact. Once prepared, irrigated, and planted, successive operation of the project site would include maintenance and harvesting of crops. As described above, this would be conducted primarily through hand tools, with the exception of initial site preparation activities. The District is also proposing nighttime field lighting on the multipurpose fields immediately north of the project site. Construction of the nighttime field lighting would occur in November and is not anticipated to overlap with initial grading activities. As the proposed project does not include lighting, the project would not have the potential to interact with the lighting project proposed to the north. Thus, the project would not considerably contribute to any significant impacts resulting from successive projects of the same type in the same place over time. Therefore, exception (b) does not apply.
- c) Significant Effect. There are no features that distinguish this project from others in the exempt class; therefore, there are no unusual circumstances. The project involves the planting, maintenance, and harvesting of agricultural uses, without significant alterations to the existing conditions of the land. Thus, there are no unusual circumstances and exception (c) does not apply.
- d) Scenic Highways. No designated California State Scenic Highways occur in the vicinity of the project site.⁵ Additionally, there are no scenic resources such as trees, historic buildings, or rock outcroppings located on the project site. Thus, damage to scenic resources would not occur and exception (d) does not apply.
- e) Hazardous Waste Sites. Per the California Environmental Protection Agency Cortese List online database, no hazardous waste site is located within or adjacent to the project site.⁶ The project site was previously graded as part of the construction of TVHS and no major ground disturbing activities that could unearth potentially contaminated soils would occur; therefore, exception (e) does not apply.
- f) Historical Resources. The project site was previously graded as part of the construction of TVHS and no major ground disturbing activities would occur. The project would not alter any built environment features. As such, the project would not cause a substantial adverse change in the significance of a known or previously undiscovered historical resource. Therefore, exception (f) does not apply.

³ Ibid.

⁴ CADRE Environmental. *Coastal California Gnatcatcher United States Fish and Wildlife Service Focused Surveys for 8.50-Acre Temecula Valley High School Study Area, City of Temecula, Western Riverside County, California*, June 7, 2021.

⁵ California Department of Transportation, Scenic Highways, <https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways>, accessed October 5, 2022.

⁶ California Environmental Protection Agency, *Cortese List Data Resources*, <https://calepa.ca.gov/sitecleanup/corteselist/>, accessed October 5, 2022.



TVHS Hillside Agriculture Project
Class 4 Categorical Exemption

Local Vicinity



