

Appendix A Notice of Preparation (NOP) and Comments

Appendices

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GARDEN GROVE UNIFIED SCHOOL DISTRICT

10331 Stanford Avenue • Garden Grove, California 92840-6353
Phone: (714) 663-6000 • Fax: (714) 663-6100

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GARDEN GROVE UNIFIED SCHOOL DISTRICT Notice of Preparation

Subject: Notice of Preparation (NOP) of an Environmental Impact Report
Project: **Sports Facilities Lighting at La Quinta High School**
Lead Agency: Garden Grove Unified School District

In its capacity as lead agency for the Sports Facilities Lighting at La Quinta High School project, the Garden Grove Unified School District has determined that a Draft Environmental Impact Report (DEIR) should be prepared to analyze the impacts of the project in accordance with the California Environmental Quality Act (Pub. Resources Code, section 21166 et seq; CEQA).

The lighting project is prompted by the passage of SB 328, which requires high schools to start no earlier than 8:30 a.m., beginning in the 2022-23 school year. The later start shifts certain sports activities into sunset hours, which would prevent the activity unless lights are added to their respective fields and courts. As a result, the District proposes to add lights to the baseball, football, soccer, and softball fields, as well as its tennis courts and track at La Quinta High School (LQHS). Sports lighting would consist of concrete bases with galvanized steel poles between 50 and 80 feet tall, with LED luminaires mounted at various heights. The proposed project would require limited demolition of hardscape and softscape to install lighting poles and electrical power at the existing sports facilities.

Due to the amount of time required to erect the permanent lights describe above, the District plans to use temporary lights at the football field only.

The DEIR will focus on the key environmental effects of the project, including aesthetics (including light and glare), air quality, cultural and paleontological resources, energy, greenhouse gas emissions, noise, transportation, and tribal cultural resources. Other environmental issues are considered less than significant, and this determination will be explained in the EIR. This notice and all future CEQA documents will be available for review at this website: <https://www.ggusd.us/departments/facilities>

The purpose of this notice is to request input regarding the scope and content of the environmental information that should be included in the forthcoming DEIR. The District is distributing this NOP for 30 days, from April 12, 2022, to May 11, 2022. Pursuant to the time limits mandated by State law, please send any comments at the earliest possible date **but not later than May 11, 2022 at 5:00 p.m.** to Kevin Heerschap:

Project Title: **Sports Facilities Lighting at La Quinta High School**

Send Responses to:

Attn: Sports Facilities Lighting at La Quinta High School

Kevin Heerschap, Assistant Director, Facilities Department

Garden Grove Unified School District

11700 Knott Avenue, Building C

Garden Grove, CA 92841

Phone: (714) 663.6442

Email: facilities@ggusd.us

If you have any questions related to the proposed project, review process, environmental documentation, or if further information is desired, you may contact the Facilities Department at (714) 663.6442.

Attachment:

Figure 1 – Aerial Photograph

Figure 1 - Aerial Photograph



— School Boundary ① Tennis Courts ③ Baseball Field ⑤ Soccer Field
② Football Field ④ Softball Field

0 275
Scale (Feet)



Source: Nearmap, 2022

From: Clyde Morgan

Sent: Thursday, April 14, 2022 7:28 AM

To: Facilities <facilities@ggusd.us>

Subject: Notice of Preparation response to Facilities Department

Attn: Sports Facilities Lighting at La Quinta High School

DEIR Sirs,

The purpose of this email is to respond to your request for input regarding your notice of preparation report of the **Sports Facilities Lighting at La Quinta High School**.

In true bureaucratic form your notice has failed to reveal the two most important and relevant pieces of information affecting the residents in the surrounding neighborhoods. First, your diagram shows no locations of the lights and no gradations of impact on the surrounding neighborhoods. You should have shown patterns of lighting and expected lumens at various concentric distances from the luminaries. Secondly, you made no statement regarding how late into the evening the lights will be operating.

If I had the right to shine a light into your bedroom window, wouldn't you like to know when I'm supposed to turn it off?

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From: [Facilities](#)
To: [Margarita Cabral](#); [Facilities](#)
Cc: [Lijin Sun](#)
Subject: RE: Sports Facilities Lighting at La Quinta High School Project

Good Afternoon Margarita,

The NOP is the only available document currently. This document has been circulated in order to allow community and Agency input in preparation for the initial study. Any subsequent documents will also be posted in the same area of the website.

Thank you

Kevin Heerschap
Assistant Director, Facilities Department
Office 714.663.6442
Cell 714.765.9240
Fax 714.663.6362
kheerschap@ggusd.us

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11700 Knott Avenue
Garden Grove, California 92841

www.ggusd.us

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From: Margarita Cabral <mcabral@aqmd.gov>
Sent: Thursday, April 14, 2022 12:26 PM
To: Facilities <facilities@ggusd.us>
Cc: Lijin Sun <LSun@aqmd.gov>
Subject: Sports Facilities Lighting at La Quinta High School Project

CAUTION: This email originated from outside of GGUSD. Please do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good Afternoon!

My name is Margarita from South Coast A.Q.M.D. I am in receipt of the Notice of Preparation regarding above project. On the notice, it makes reference to CEQA documents being available at <https://www.ggusd.us/departments/facilities>. However, only the Notice of Preparation is posted. There is no posting of this project on CEQAnet. Can you guide me as to where on your website the additional CEQA documents may be available for public review?

Thank you for your help.

Margarita Cabral

Senior Office Assistant, CEQA IGR
Planning, Rule Development & Area Sources
South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765
(909) 396-3052
mcabral@aqmd.gov



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL:

May 5, 2022

facilities@ggusd.us

Kevin Heerschap, Assistant Director
Garden Grove Unified School District, Facilities Department
11700 Knott Avenue, Building C
Garden Grove, California 92841

Notice of Preparation of a Draft Environmental Impact Report for the Sports Facilities Lighting at La Quinta High School (Proposed Project)

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Our comments are recommendations on the analysis of potential air quality impacts from the Proposed Project that should be included in the Draft Environmental Impact Report (EIR). Please send a copy of the Draft EIR upon its completion and public release directly to South Coast AQMD as copies of the Draft EIR submitted to the State Clearinghouse are not forwarded. **In addition, please send all appendices and technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all emission calculation spreadsheets, and air quality modeling and health risk assessment input and output files (not PDF files). Any delays in providing all supporting documentation for our review will require additional review time beyond the end of the comment period.**

CEQA Air Quality Analysis

Staff recommends that the Lead Agency use South Coast AQMD's CEQA Air Quality Handbook and website¹ as guidance when preparing the air quality and greenhouse gas analyses. It is also recommended that the Lead Agency use the CalEEMod² land use emissions software, which can estimate pollutant emissions from typical land use development and is the only software model maintained by the California Air Pollution Control Officers Association.

South Coast AQMD has developed both regional and localized significance thresholds. South Coast AQMD staff recommends that the Lead Agency quantify criteria pollutant emissions and compare the emissions to South Coast AQMD's CEQA regional pollutant emissions significance thresholds³ and localized significance thresholds (LSTs)⁴ to determine the Proposed Project's air quality impacts. The localized analysis can be conducted by either using the LST screening tables or performing dispersion modeling.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the Proposed Project and all air pollutant sources related to the Proposed Project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road

¹ South Coast AQMD's CEQA Handbook and other resources for preparing air quality analyses can be found at: <http://www.aqmd.gov/home/rules-compliance/ceqa/air-quality-analysis-handbook>.

² CalEEMod is available free of charge at: www.caleemod.com.

³ South Coast AQMD's CEQA regional pollutant emissions significance thresholds can be found at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>.

⁴ South Coast AQMD's guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips, and hauling trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers and air pollution control devices), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates diesel emissions from long-term construction or attracts diesel-fueled vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment⁵.

In the event that implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the Draft EIR. The assumptions in the air quality analysis in the EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits should be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Mitigation Measures

In the event that the Proposed Project results in significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized to minimize these impacts. Any impacts resulting from mitigation measures must also be analyzed. Several resources to assist the Lead Agency with identifying potential mitigation measures for the Proposed Project include South Coast AQMD's CEQA Air Quality Handbook¹, South Coast AQMD's Mitigation Monitoring and Reporting Plan for the 2016 Air Quality Management Plan⁶, and Southern California Association of Government's Mitigation Monitoring and Reporting Plan for the 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy⁷.

South Coast AQMD staff is available to work with the Lead Agency to ensure that air quality, greenhouse gas, and health risk impacts from the Proposed Project are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov.

Sincerely,

Lijin Sun

Lijin Sun

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS
ORC220414-05
Control Number

⁵ South Coast AQMD's guidance for performing a mobile source health risk assessment can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>.

⁶ South Coast AQMD's 2016 Air Quality Management Plan can be found at: <http://www.aqmd.gov/docs/default-source/Agendas/Governing-Board/2017/2017-mar3-035.pdf> (starting on page 86).

⁷ Southern California Association of Governments' 2020-2045 RTP/SCS can be found at: https://www.connectsocial.org/Documents/PEIR/certified/Exhibit-A_ConnectSoCal_PEIR.pdf.