

Notice of Exemption

Appendix E

To: Office of Planning and Research
P.O. Box 3044, Room 113
Sacramento, CA 95812-3044
County Clerk
County of: San Diego
1600 Pacific Highway
San Diego, CA 92101

From: (Public Agency): Grossmont Union High School District
1100 Murray Drive El Cajon, CA 92020
(Address)

Project Title: Grossmont High School Solar Project

Project Applicant: Grossmont Union High School District

Project Location - Specific:
1100 Murray Drive, El Cajon, CA 92020

Project Location - City: El Cajon Project Location - County: San Diego County

Description of Nature, Purpose and Beneficiaries of Project:

Please see Attachment A.

Name of Public Agency Approving Project: Grossmont Union High School District

Name of Person or Agency Carrying Out Project: Grossmont Union High School District

Exempt Status: (check one):

- Ministerial (Sec. 21080(b)(1); 15268);
- Declared Emergency (Sec. 21080(b)(3); 15269(a));
- Emergency Project (Sec. 21080(b)(4); 15269(b)(c));
- Categorical Exemption. State type and section number: 15303, 15304, 15311, and 15314
- Statutory Exemptions. State code number: 2 10 8 0 3

Reasons why project is exempt:

Please see Attachment A.

Lead Agency Contact Person: Katy Wright Area Code/Telephone/Extension: 619-644-8154

If filed by applicant:

1. Attach certified document of exemption finding.
2. Has a Notice of Exemption been filed by the public agency approving the project? Yes No

Signature: Katy Wright Date: 7-25-2022 Title: Executive Director Facilities

Signed by Lead Agency Signed by Applicant

Authority cited: Sections 21083 and 21110, Public Resources Code.
Reference: Sections 21106, 21152, and 21152.1, Public Resources Code.

Date Received for filing at OPR: _____

Grossmont High School Solar Project Notice of Exemption (NOE)

The Grossmont Union High School District (District), as the Lead Agency under the California Environmental Quality Act (CEQA), proposes to install new solar panels at the Grossmont High School (GHS) campus (hereinafter referred to as the “proposed project”).

An Initial Study was prepared in 2017 for the Grossmont High School Modernization and Additional Project (District 2017) and another Initial Study was prepared for the Bus Maintenance Facility Project in 2020 (District 2020). The initial studies were reviewed for the preparation of this NOE, as they identify the existing conditions of the school site.

Project Location:

The proposed project is located on the GHS campus at 1100 Murray Drive, El Cajon, California. The existing bus maintenance facility and associated parking lot is located on the northern portion of the campus. All components of the proposed project would occur within the boundaries of the school. Access to the site is available via Mildred Street.

Existing Conditions:

The GHS site is located in a developed residential neighborhood. To the north of the GHS site is Washington Street followed by Harry Griffen Park, to the south are high school classrooms and administrative buildings, to the west is a maintenance yard associated with GHS, and to the east is a ballfield associated with GHS. The school currently consists of 96 total classrooms, made up of 92 permanent and 4 portable classrooms, parking lots, hardcourt areas, natural turf fields, and a football stadium.

Description of Project:

The proposed project would include the following:

- Installation of five photovoltaic canopies over an existing parking lot.
- Installation of one roof photovoltaic array on the roof of the new bus maintenance facility.
- Installation of associated accessibility for the solar.
- Installation of a utility connection via an underground small boring through the transportation yard lot on site.

No grading is required, and all construction staging will occur within the boundaries of the school site. The proposed project would serve the existing student enrollment and would not result in an increase in student or program capacity, nor would the project result in an increase of employees at the project site. In addition, there would be no off-site circulation or traffic changes and construction activities would take place on campus. Construction is expected to start in August 2022 and end October 2022.

Applicability of Exempt Status:

The proposed project is subject to CEQA. However, the proposed project is Statutorily and Categorically Exempt. The proposed work at the GHS site is Statutorily Exempt under Public Resources Code (PRC) Section 21080.35 and Categorically Exempt under Section 15303(e) – New Construction or Conversion of Small Structures, Section 15304(f) – Minor Alternations to Land, Section 15311 – Accessory Structures, and Section 15314 – Minor Additions to Schools. The proposed project is considered categorically exempt for the following reasons.

New Construction or Conversion of Small Structures (Class 3)

Class 3 consist of construction and location of limited numbers of new, small facilities or structures; installation of small new equipment and facilities in small structures; and the conversion of existing small structures from one use to another where only minor modifications are made in the exterior of the structure. The numbers of structures described in this section are the maximum allowable on any legal parcel. Examples of this exemption include, but are not limited to:

- (a) One single-family residence, or a second dwelling unit in a residential zone. In urbanized areas, up to three single-family residences may be constructed or converted under this exemption.
- (b) A duplex or similar multi-family residential structure, totaling no more than four dwelling units. In urbanized areas, this exemption applies to apartments, duplexes and similar structures designed for not more than six dwelling units.
- (c) A store, motel, office, restaurant or similar structure not involving the use of significant amounts of hazardous substances, and not exceeding 2500 square feet in floor area. In urbanized areas, the exemption also applies to up to four such commercial buildings not exceeding 10,000 square feet in floor area on sites zoned for such use if not involving the use of significant amounts of hazardous substances where all necessary public services and facilities are available and the surrounding area is not environmentally sensitive.
- (d) Water main, sewage, electrical, gas, and other utility extensions, including street improvements, of reasonable length to serve such construction.
- (e) Accessory (appurtenant) structures including garages, carports, patios, swimming pools, and fences.
- (f) An accessory steam sterilization unit for the treatment of medical waste at a facility occupied by a medical waste generator, provided that the unit is installed and operated in accordance with the Medical Waste Management Act (Section 117600, et seq., of the Health and Safety Code) and accepts no offsite waste.

The proposed canopy structures would be located in the existing developed areas of the campus and would serve as carports in the parking lot. Therefore, the proposed project would be Categorically Exempt under Class 3.

Minor Alterations to Land (Class 4)

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

- (a) Grading on land with a slope of less than 10 percent, except that grading shall not be exempt in a waterway, in any wetland, in an officially designated (by federal, state, or local government action) scenic area, or in officially mapped areas of severe geologic hazard such as an Alquist Priolo Earthquake Fault Zone or within an official Seismic Hazard Zone, as delineated by the State Geologist.
- (b) New gardening or landscaping, including the replacement of existing conventional landscaping with water efficient or fire resistant landscaping.
- (c) Filling of earth into previously excavated land with material compatible with the natural features of the site;
- (d) Minor alterations in land, water, and vegetation on existing officially designated wildlife management areas or fish production facilities which result in improvement of habitat for fish and wildlife resources or greater fish production;
- (e) Minor temporary use of land having negligible or no permanent effects on the environment, including carnivals, sales of Christmas trees, etc;
- (f) Minor trenching and backfilling where the surface is restored;
- (g) Maintenance dredging where the spoil is deposited in a spoil area authorized by all applicable state and federal regulatory agencies;
- (h) The creation of bicycle lanes on existing rights-of-way.
- (i) Fuel management activities within 30 feet of structures to reduce the volume of flammable vegetation, provided that the activities will not result in the taking of endangered, rare, or threatened plant or animal species or significant erosion and sedimentation of surface waters. This exemption shall apply to fuel management activities within 100 feet of a structure if the public agency having fire protection responsibility for the area has determined that 100 feet of fuel clearance is required due to extra hazardous fire conditions.

The project would include the installation of a utility connection via an underground small boring through the transportation yard lot on site. The project would potentially include minor trenching

for the electrical transmission lines, which would be backfilled and restored to pre-project conditions once construction is complete.

Accessory Structures (Class 11)

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

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

The proposed project would install five photovoltaic canopy structures within a small existing parking lot and on the roof of an existing building located on the northern portion of the campus. Construction activities would be minor on the site. Therefore, the proposed project would be Categorically Exempt under Class 11.

Minor Additions to Schools (Class 14)

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

The proposed project would include the installation of five photovoltaic canopies over an existing parking lot and the installation one roof photovoltaic array on the roof of the new bus maintenance facility. The proposed upgrades are intended to serve the existing student body and bus facility, which would not induce any increase in student enrollment. In addition, the proposed project does not include the construction of any new classrooms or other facilities that would increase the student capacity of the campus by more than 25% or ten classrooms. As noted above, no increase in student enrollment or staffing would occur as a result of the proposed project.

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

The following summarizes the determination that the proposed project does not have the potential to trigger any of the exceptions identified in State CEQA Guidelines Section 15300.2 prohibiting the use of a categorical exemption.

- (a) **Location.** The proposed project would occur entirely within the boundaries of an existing high school campus in an urbanized community. The site has been developed as a school since 1920. All areas of the project site are either paved or disturbed, and therefore are not environmentally sensitive. Surrounding land uses consist of residential land uses. However, the proposed project would not extend into any offsite areas. Therefore, this exception does not apply to the project.
- (b) **Cumulative Impact.** There are no known future projects on the campus or within the surrounding community that, when combined with the proposed project, would result in a

cumulatively considerable effect on the environment. Therefore, this exception does not apply to the project.

- (c) **Significant Effect.** The proposed project includes the installation of five photovoltaic canopies over an existing parking lot, installation of one roof photovoltaic array on the roof of the new bus maintenance facility, installation of associated accessibility for the solar and the installation of a utility connection via an underground small boring through the transportation yard lot on site. The project site and surrounding neighborhoods are located within an urbanized area, and no work is proposed offsite that could result in impacts on sensitive vegetation or other environmentally sensitive areas as a result of the proposed project. As such, there is nothing unusual about the project site or surrounding area. Furthermore, there is nothing unusual about the design of the proposed project that could result in a significant effect on the environment due to unusual circumstances. Therefore, there is no reasonable possibility that the proposed project would have a significant effect on the environment due to unusual circumstances, and this exception does not apply to the project.
- (d) **Scenic Highways.** The proposed project would not result in the demolition of existing structures or the construction of new facilities that would directly or indirectly affect an officially designated scenic highway or scenic resources near a scenic highway. Therefore, this exception does not apply to the project.
- (e) **Hazardous Waste Sites.** As discuss in the Initial Study, according to the California State Water Resources Control Board GeoTracker database, no hazardous materials or sites that could be accidentally released are known to occur within the project site. An underground storage tank was removed from the bus maintenance facility site on December 27, 2019, and tank closure was completed per the County of San Diego Department of Environmental Health (DEH) (Grossmont Union High School District 2020). The school campus adjacent to the GHS site is listed on the DTSC Site Mitigation and Brownfield and Reuse Program, the State Tribal Sites – Site Mitigation and Brownfields Reuse Program Database, and on Envirostor as a School Cleanup Program site. The listing is due to a former debris pile adjacent to the southern portion of the Bus Maintenance Facility parking lot onsite. In January of 2011, the Certification of Removal Action was signed, indicating DTSC determined the necessary actions had been completed at the site. Any hazardous materials encountered on the project site would be handled in accordance with all local, state, and federal regulations. In addition, the high school campus adjacent to the GHS site is listed on the leaking underground storage tank (LUST) Information System database. There are four LUST Cleanup Sites listed that are associated with the high school campus, all of which are closed (Grossmont Union High School District 2020). In addition, previous studies found 1-3-butadiene within the soil of a portion of the site. However, further studies determined it was not a concern (Envirostor 2022). Though the GHS site is located near sites that are on lists compiled pursuant to Government Code Section 65962.5, these sites are not anticipated to cause a significant hazard to the public or the environment because they are closed or not significant.

An updated search of the State Water Resources Control Board GeoTracker website and the Department of Toxic Substances Control EnviroStor website was conducted on July 21, 2022

to confirm the current status of these hazardous materials sites and to identify if any new sites had been listed, and no new sites were identified (Geotracker 2022; Envirostor 2022). Therefore, since the hazardous materials sites are listed as closed or no further action, and construction would be in compliance with applicable regulations, the proposed project would not result in a significant impact related to hazardous materials. Therefore, this exception does not apply to the project.

- (f) **Historical Resources.** The proposed project includes the installation of roof and parking canopy solar panels. No buildings or other structures considered a historical resource at the GHS site will be demolished as part of this project (Johnson, pers. Comm., 2022). Therefore, the proposed project would not cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5 of the State CEQA Guidelines, and this exception does not apply to the project.

References:

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

Grossmont Union High School District (District). 2017. *Grossmont High School Modernization and Addition Project Initial Study*. March.

EnviroStor. 2022 *Sites and Facilities*. Available at https://www.envirostor.dtsc.ca.gov/public/profile_report?global_id=60000857. Accessed on July 21, 2022.

Geotracker. 2022, *Sites and Facilities*. Available at https://geotracker.waterboards.ca.gov/profile_report?global_id=T0607300316. Accessed on July 21, 2022.

Johnson, Dena, Grossmont Union High School District. April 5, 2022 – telephone conversation with Kathie Washington of Ascent Environmental regarding previous historical analysis prepared for the Grossmont High School campus.