

CATEGORICAL EXEMPTION

INDIO HIGH SCHOOL BASEBALL FIELDS RENOVATION PROJECT

This document assesses the use of categorical exemptions in the California Environmental Quality Act (CEQA) for the proposed upgrades to the junior varsity (JV) sports fields at Indio High School under California Public Resources Code Section 21084 and CEQA Guidelines Sections 15302 Class 2, and 15314 Class 14 (California Code of Regulations Title 14 Sections 15000 et seq.).

1.0 PROJECT BACKGROUND INFORMATION

The Desert Sands Unified School District (DSUSD or District) is proposing improvements to the Junior Varsity (JV) sports fields at Indio High School, Indio, California (the proposed project). The school opened in 1958 and reconstructed between 2013 and 2018, with the exception of the football stadium. The District has determined that the JV sports fields at the school, including the JV baseball, softball and soccer fields, are in need of improvement. The existing JV sports fields include baseball diamonds, protective fencing, dug outs, aluminum bleachers, and pitching warm up areas. The JV sports fields are located on southern boundary of the school site, between the existing varsity baseball and softball fields.

The existing school includes varsity baseball and softball fields, as well as the football and track stadium. All of these varsity fields, as well as the football/track stadium, are currently lighted for evening activities.

The proposed project consists of upgrades to the JV sports fields to install new lighting, consistent with the existing varsity fields. The project will not add or remove any classrooms or other buildings and the project does not include the construction of any new buildings.

1.1 PROJECT LOCATION AND ZONING

The proposed project site is located at 81750 Avenue 46, Indio, California, 92201. The campus is located east of Clinton Street, south of Avenue 46, west of Rajah Way, and north of Granada Drive, in the city of Indio. Regional access to the site is provided by Interstate 10 (I-10) via Monroe Street or Clinton Street, (Jefferson Street off-ramp), approximately 1.25 miles north of the site. State Route 111 (CA-111), is located approximately one-quarter mile south of the school and is accessed via Clinton Street.

1.2 EXISTING FACILITIES

Indio High School contains multiple single-story and two-story buildings and classrooms, as well as a cafeteria, tennis courts, football and track stadium; baseball/softball fields,

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soccer fields, gymnasium, swim pool and stadium, volleyball courts, basketball courts, restroom buildings, multipurpose room, hardscape areas, and a library. Parking is provided in two parking lots located on the northern side of the school adjacent to Avenue 46 and include student pickup and drop off areas. Parking is also provided along Rajah Way.

The areas surrounding Indio High School are largely residential on the north and east, and include the Indio Community Center on the northwest corner of Clinton Street/Avenue 46. Commercial areas are located east of the school site (east of Rajah Way) and south of the school site, adjacent to Highway 111. An apartment complex is located adjacent to the southwest corner of the school site and south of the existing varsity baseball field. The existing varsity baseball, softball and football/track fields are currently lighted.

The Indio High School site is designated for Public and Institutional uses in the Indio General Plan (Indio, 2019). The Public and Institutional uses designation allows the use of schools and other types of public facilities. The area immediately south of the school is considered to be a mixed use neighborhood by the Highway 111 Corridor Specific Plan, (City of Indio, 2022). This area of the City has been developed and surrounding land uses include low and high density residential to the north, low density residential to the west, commercial to the west and south, and residential to the south.

1.3 SCHOOL ENROLLMENT AND CAPACITY

Indio High School serves Grade 9 through Grade 12 and had an enrollment of 2,143 students in the 2022-2023 school year. Table 1 shows student enrollment at Indio High School over the last 10 years averaged approximately 2,012 students per year.

TABLE 1

Indio High School Enrollment History

SCHOOL YEAR	ENROLLMENT
2022-2023	2,143
2021-2022	2,016
2020-2021	2,074
2019-2020	2,034
2018-2019	2,066
2017-2018	1,986
2016-2017	2,024
2015-2016	1,910
2014-2015	1,866
2013-2014	1,999
10-Year Average Enrollment	2,012

Source: CDE, 2023

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2.0 PROJECT DESCRIPTION

The District is proposing improvements to the JV sports fields at Indio High School. The existing JV sports fields include baseball diamonds, protective fencing, dug outs, aluminum bleachers, and pitching warm up areas. The JV sports fields are located on southern boundary of the school site, between the existing varsity baseball and softball fields.

The proposed project consists of upgrades to the JV sports fields to install new lighting, consistent with the existing varsity fields. The proposed project would add 10 light poles between 70 to 80 feet in height with a total of approximately 58 light fixtures throughout the perimeter of the JV sports fields. The lighting will be predominately oriented away from the south (and nearby residential apartments) to the north to illuminate the configuration of the JV baseball/softball fields and limit light spillage to the areas south of the sports fields. The lighting will be the strongest in the infield area and decrease with distance from the light poles. In addition, lighting of the soccer field will be provided and the lighting will be dispersed through the north side of the field. Activities will not occur on the JV sports fields at the same time as games would conflict with each other. The project will not add or remove any classrooms or other buildings and the project does not include the construction of any new buildings. Therefore, there will be no change in the number of classrooms or the student capacity of the school following completion of the project.

3.0 CEQA EVALUATION

3.1 CLASS 2 EXEMPTION – REPLACEMENT OR RECONSTRUCTION

A Class 2 Exemption (CEQA Section 15302 – Replacement or Reconstruction) applies to the “replacement or reconstruction of existing structures and facilities where the new structure will be located on the same site as the structure replaced and will have substantially the same purpose and capacity as the structure replaced, including but not limited to: (a) Replacement or reconstruction of existing schools and hospitals to provide earthquake resistant structures which do not increase capacity more than 50 percent.”

The proposed project aims to modernize the existing JV sports fields at Indio High School. No other buildings or structures are included as part of the project. Therefore, the project includes the reconstruction of existing facilities at the school site to provide lighting to the fields. The overall purpose of the school and the sports fields would not change. The student capacity of the school would not increase. The project would not result in any expansion of the existing use and there will be no increase in the number of classrooms or overall student capacity.

Therefore, the proposed modifications to Indio High School are considered to be exempt per CEQA Guidelines §15302 Class 2 exemption for the following reasons:

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- (1) The proposed project (reconstruction and modernization of the JV sports fields) will be located on the same site as the existing JV sports fields.
- (2) The renovated facilities will not result in a change in purpose and they will continue to be used for athletic purposes.
- (3) There will be no increase in classrooms or student capacity; therefore, the capacity of the school would not increase more than 50 percent.

3.2 CLASS 14 EXEMPTION – MINOR ADDITIONS TO SCHOOLS

CEQA guidelines include exemptions for certain types of minor projects, including school projects. A Class 14 Exemption (CEQA Section 15314 – Minor Additions to Schools) applies to “minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or 10 classrooms, whichever is less.”

The objective of the proposed project is to modernize and improve the existing JV sports fields at Indio High School. The proposed project would add lights to the JV sports field and no other buildings or structures are included as part of the project. The number of classrooms at Indio High School would not change (increase or decrease) after modernization activities are complete. The capacity of the school would not change and thus the student capacity is not expected to increase (i.e., increase in capacity would be less than 25%).

All of the proposed modifications to Indio High School are within the confines of the existing school. The proposed project would not result in any increase in classrooms or result in an increase in student capacity. Therefore, the proposed modifications to Indio High School are considered to be exempt per CEQA Guidelines §15314 Class 14 exemption for the following reasons:

- (1) The proposed project would not result in an increase in classrooms (which is less than 10 classrooms); and
- (2) There would be no increase in student capacity (which is less than 25 percent).

3.3 EXCEPTIONS TO CATEGORICAL EXEMPTIONS

CEQA Guidelines Section 15300.2, Exceptions, identifies conditions under which categorical exemptions would not be applicable. The proposed project has been reviewed under Section 15300.2 for characteristics or circumstances that might invalidate findings that the proposed project is exempt.

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A. Location

CEQA Guidelines Section 15300.2(a) states that Class 3, 4, 5, 6, and 11 exemptions are qualified by consideration of whether the project is located in a uniquely sensitive environment, such that it impacts an environmental resource of hazardous or critical concern that has been designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies. This exception does not apply to the project as it is exempt under Class 2 and 14 exemptions and all modifications would occur within an existing high school campus in an urban community where there are no known sensitive environmental conditions.

B. Cumulative Impact

Exemptions are not applicable when there is a significant cumulative impact of “successive projects of the same type in the same place over time.” Beyond the proposed project, the District has no other planned improvements at Indio High School.

Lights were added to the varsity baseball and softball fields at Indio High School in 2018. The existing 20 field lights are mounted on approximately 80-foot tall poles with the luminaires aimed downward toward the fields. Ten new light fixtures are designed to be attached at 70 – 80 feet above grade to existing poles or new 80-foot poles and aimed downward toward the fields.

The illumination of the JV sports fields is expected to be similar to the in intensity to the existing field (i.e., the Varsity baseball field) located between the Varsity baseball field to the west of the JV sports fields and the Varsity Softball field to the east. The anticipated illumination of the JV sports fields was evaluated by Musco Lighting to determine the foot-candles of illumination on the fields (Musco Lighting File #186058C, 05/22/2023). The expected illumination on the fields is modeled to be between 21 and 65 foot-candles depending on the location on the field and which field is illuminated. The illumination is typical for a sports field.

The area to the south of the JV sports fields includes a 20-foot wide access road and an 8-10 foot wide unpaved area with some trees at the west end of the JV sports fields within the school property and vacant land zoned for general neighborhood¹ and an existing commercial building with parking lot immediately outside the school boundary on the north side of Granada Drive. An existing residential development is located west of the vacant land. On the south side of Granada Drive is a parking lot with night lighting that services the O’Reilly Auto Parts that faces Highway 111. The Varsity baseball field, located approximately 50 feet north of the existing residential area, is the closest sports field to the adjacent residential area at the school.

¹City of Indio, 2022. 111 Corridor Specific Plan, Figure 3.4-1, adopted 09/01/2022, <https://www.indio.org/home/showpublisheddocument/2996/638017075645130000> (accessed 05/25/2023).

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Based on the above information, the lighting at the JV sports field is not expected to be discernable from the existing lighting at the Varsity sports fields. In addition, the residential area would be further away from the JV sports field than the varsity baseball field (which is currently lighted). Therefore, no cumulative impacts on light and glared are expected.

The District has proposed and completed school modernization improvements at other schools in the District, including two school modernization projects in Indio, James Madison Elementary School and John F. Kennedy Elementary School. These school sites are located 0.6 mile west and 0.5 mile north of Indio High School.

Environmental effects caused by the modernization and improvements to other schools would be localized, limited to construction activities, and not within range of project effects at the other school sites, e.g., traffic, noise, etc. Each school's modernization project would comply with applicable local, state, and federal regulations and District best management practices. Therefore, any potential overlap of construction activities/schedules would not result in a significant adverse impact and would not be cumulatively considerable. Additionally, there are no related projects near Indio High School whose environmental effects could be combined with the proposed project's to create cumulatively significant construction and operational impacts. Therefore, this exception does not apply to the proposed project.

C. Significant Effects

A categorical exemption cannot 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 (CEQA Guidelines Section 15300.2(c)). The determination whether this exception applies involves two distinct questions: (1) whether the project presents unusual circumstances, and (2) whether there is a reasonable possibility that a significant environmental impact will result from those unusual circumstances. The lead agency considers the second prong of this test only if it first finds that some circumstance of the project is unusual. *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal4th 1086, 1104.

The proposed facility improvements at Indio High School are not unusual. The proposed project, including the improvements to the JV sports fields, would be confined to the boundaries of the existing school campus and the existing fields. The project would renovate the existing JV sports fields by adding lighting to the facilities. The improvements are common for school projects, which must adhere to strict standards established by California Code of Regulations Title 5, California Building Code, and California Education Code and are overseen by the California Department of Education and Division of the State Architect.

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Indio High School serves an urbanized area and the District does not forecast substantial enrollment growth at the school or within the District. The proposed project implementation will not result in an increase in student capacity as no additional classrooms will be built. The proposed project would result in normal construction activities within the confines of the existing campus. The project would improve existing facilities and modernize the sports fields, but is not expected to result in substantial changes and school operations would be substantially the same as current operations.

There are no known unusual circumstances related to the project site or the proposed project, and there is also no evidence that the project would cause significant direct or indirect environmental effects. The District and its construction manager will comply with all applicable local, state, and federal laws, regulations, and best management practices that would minimize potential environmental impacts caused by construction activities. Therefore, this exception does not apply to the proposed project.

D. Scenic Highways

A categorical exemption cannot 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 (CEQA Guidelines Section 15300.2(d)). The closest officially designated scenic highway is State Route 74 which runs southwest from CA-111 in Palm Desert, CA (CalTrans, 2023). Indio High School is located over 10 miles northeast of the portion of State Route 74 where the scenic highway designation begins. Due to the distance, topography, development, existing lights, and intervening hills/structures, the school site would not be visible or result in a visual impact to a scenic resource. Therefore, this exception does not apply to the proposed project.

E. Hazardous Waste Sites

A categorical exemption cannot be used for a project on a site that is on any list compiled pursuant to Section 65962.5 of the California Government Code (CEQA Guidelines Section 15300.2(e)). Section 65962.5 of the California Government Code specifies: (1) lists of hazardous materials sites and hazardous waste facilities; (2) hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; (3) public drinking water wells containing detectable levels of organic contaminants; (4) underground storage tanks with reported unauthorized releases; and (5) solid waste disposal facilities from which hazardous waste has migrated. Three regulatory agency databases were searched including: (1) GeoTracker, maintained by the State Water Resources Control Board (RWQCB, 2023); (2) EnviroStor, maintained by the California Department of Toxic Substances Control (DTSC, 2023); and (3) EnviroMapper, maintained by the U.S. Environmental Protection Agency (U.S. EPA, 2023).

Using these search databases, no active hazardous sources were found within over a mile of Indio High School. In 2011, DTSC approved the removal of approximately 90 cubic

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yards of soil impacted with polychlorinated biphenyls (PCBs) near a former maintenance building at Indio High School. In June 2012, DTSC determined that all appropriate removal/remedial actions had been completed and all acceptable engineering practices were implemented (DTSC, 2023). No significant potential impacts are expected as a result of contamination that would impact Indio High School. Therefore, this exception does not apply to the proposed project.

F. Historic Resources

A categorical exemption cannot be used for a project which may cause a substantial adverse change in the significance of a historical resource. Historical resources are defined as buildings, structures, or objects that are more than 50 years old (CCR 4852(d)(2)). Indio High School first opened in 1958 and all buildings were demolished and reconstructed between 2013 and 2018, with the exception of the football stadium. Therefore, there are no structures that meet the minimum age requirement of 50 years to be considered for historical significance. The school site is not listed on an official local register of historical resources, the California Register of Historical Resources, nor the National Register of Historic Places (OHP, 2023). The proposed project will not remove or impact any historic structures at the school site. Therefore, the proposed project would not result in a direct impact to historical resources and this exception does not apply to the proposed project.

4.0 CONCLUSION

Based on the above discussion, the proposed modifications to Indio High School are considered to be exempt per CEQA Guidelines §15302 Class 2 exemption and §15314 Class 14 exemption for the following reasons:

- (1) The proposed project (reconstruction and modernization of the JV sports fields) will be located on the same site as the existing JV sports fields.
- (2) The renovated facilities will not result in a change in purpose and they will continue to be used for athletic purposes.
- (3) There will be no increase in classrooms or student capacity.
- (4) None of the exceptions to the exemptions apply to the proposed project.

Therefore, the proposed modifications to Indio High School meet the requirements of CEQA Guidelines §15302 Class 2 exemption and §15314 Class 14 exemption, and the proposed project is exempt under CEQA.

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5.0 REFERENCES

- California Department of Education (CDE), 2023. Enrollment Report. Accessed May 35, 2023 <https://dq.cde.ca.gov/dataquest/>
- California Department of Transportation (Caltrans), 2023. California Scenic Highway Mapping System. Accessed 5/24/2023. <https://www.arcgis.com/apps/mapviewer/index.html?layers=f0259b1ad0fe4093a5604c9b838a486a>
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