Covina-Valley Unified School District
Categorical Exemption Evaluation Report
Covina High School Swimming Pool Rehabilitation Project

September 2023

The Covina-Valley Unified School District (District) proposes the rehabilitation of the Covina High School swimming pool (Project). This Categorical Exemption Evaluation Report documents the eligibility of the Project to be exempt from expanded environmental review pursuant to the California Environmental Quality Act (CEQA), as provided under Public Resources Code Section 21084 and California Code of Regulations, Title 14 (CEQA Guidelines) Sections 15061(b)(2) and 15300 et seq.

Project Location

The Project is proposed at Covina High School, located at 463 South Hollenbeck Avenue in the City of Covina, Los Angeles County. Covina High School is surrounded by streets on all four sides; it is south of West Puente Avenue, east of South Armel Drive, north of West Rowland Street, and west of Hollenbeck Avenue. Interstate 10, approximately 0.5 miles south of Covina High School, provides regional access to the Project site. Figure 1, *Regional Vicinity,* shows the Project site and surrounding vicinity.

Existing Setting

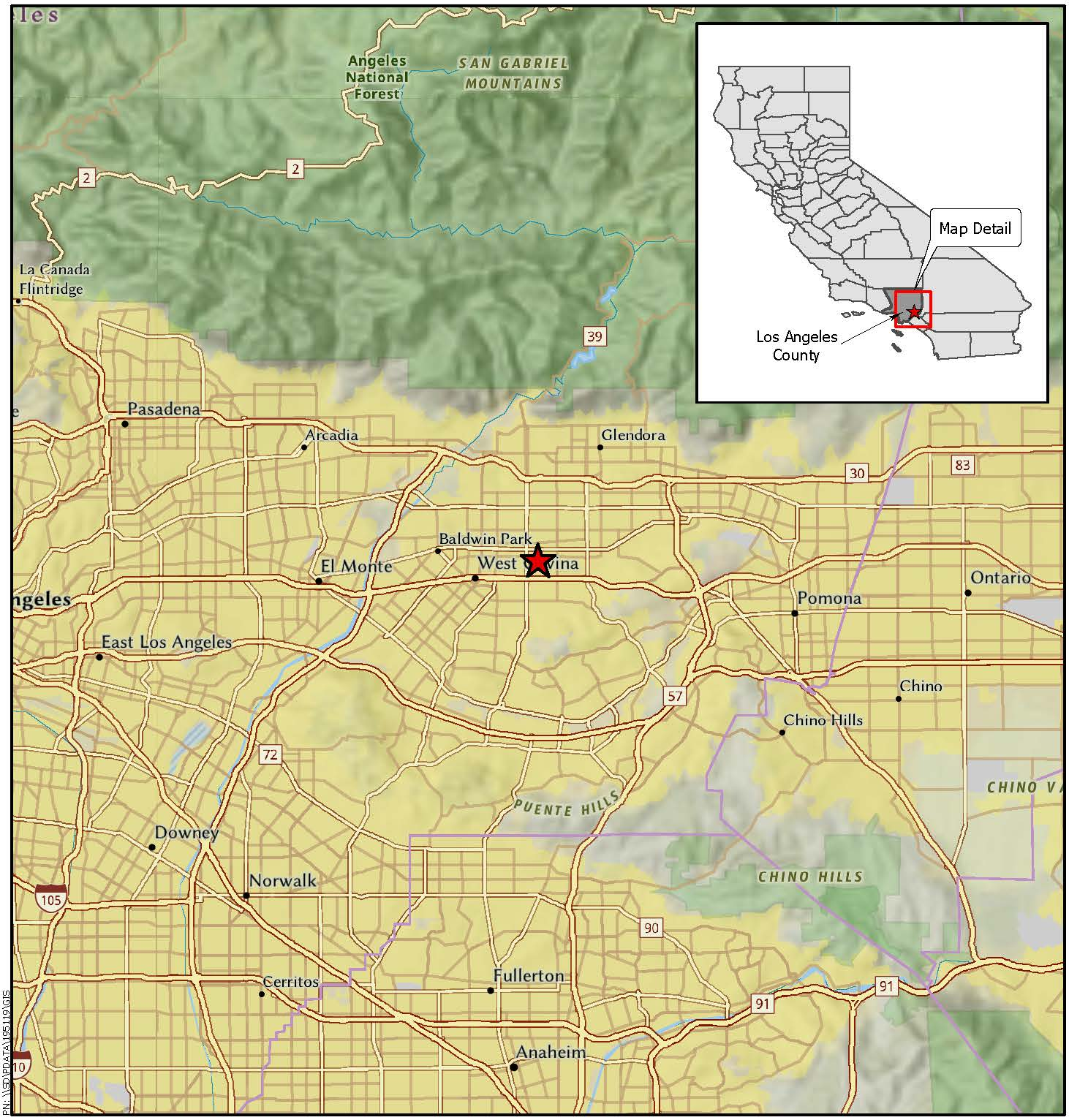
Project Site and Surrounding Improvements

The Project site is rectangular-shaped and encompasses approximately two-thirds of an acre on the roughly 36-acre Covina High School campus. As shown in Figure 2, *Local Vicinity Aerial Map,* school buildings and parking are in the eastern portion of the high school campus, and outdoor recreational uses are in the western portion. Covina High School, including the existing facilities within the Project site, was constructed in 1955 and has been improved over the years with permanent and portable building structures, play fields, and parking lots.

The Project site includes a fenced aquatics facility in the southeast corner, including a swimming pool and pool deck; a 936-square-foot pool house at the southeast corner that contains pool equipment, an office, storage spaces, and restroom facilities; and outdoor shower stalls, north of the pool house. The Project site also includes one asphalt basketball court and a wooden storage shed immediately north of the fenced aquatic facility that houses the school's landscape equipment. The western perimeter of the Project site contains natural turf that is part of a multipurpose field. Figure 3, *Site Photographs,* shows the existing conditions of the Project site.

As the Project site is located near the center of the Covina High School campus, it is surrounded by school facilities on all four sides. Three basketball courts are to the north; school buildings and softball and baseball fields are farther north. Turf, solar shade structures, and a track and field are to the west. South of the Project site are a baseball field, solar shade canopies, and the school auditorium. East of the Project site are the gymnasium and remaining school buildings.

Covina High School is surrounded by roads and residential uses on all four sides. Traweek Middle School is west of the campus, northwest of the Armel Drive and Rowland Avenue intersection; a church is east of the campus, northeast of the Hollenbeck Avenue and Rowland Street intersection; and commercial office uses are southeast of the school, on the south side of Rowland Street.



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Legend

★ Project Location

Michael Baker INTERNATIONAL

0 2.5 5 Miles

Source: Esri, ArcGIS Online, National Geographic World Map: *Covina, California*

COVINA HIGH SCHOOL
POOL REHABILITATION PROJECT

Regional Vicinity

Figure 1

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Legend

- Covina High School
- Project Site

Michael Baker INTERNATIONAL

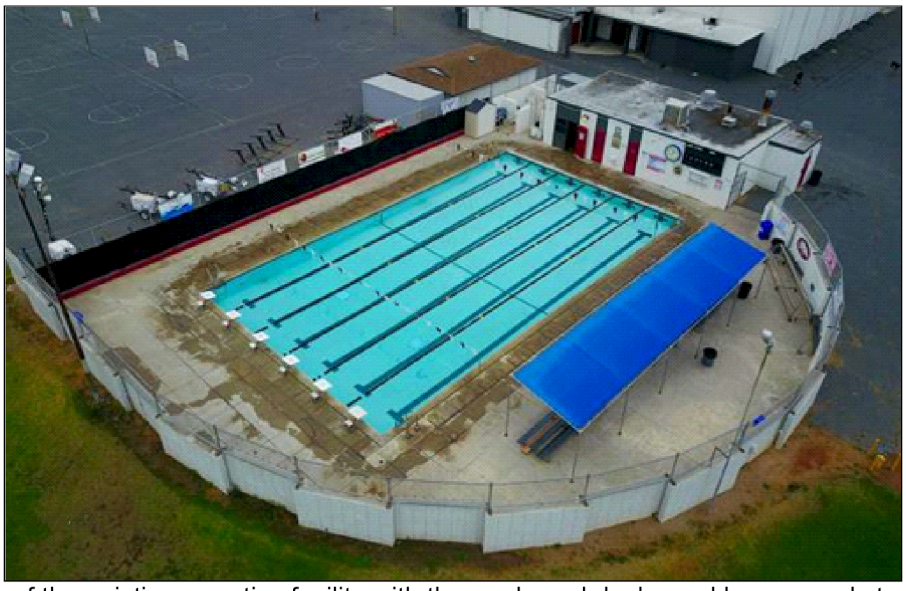
0 200 400 Feet

Source: Esri, ArcGIS Online, 2023 Nearmap Imagery: *Covina, California*

COVINA HIGH SCHOOL
POOL REHABILITATION PROJECT

Local Vicinity Aerial Map

Figure 2



Aerial view of the existing aquatics facility with the pool, pool deck, pool house, and storage shed.

View of the southwest side of the existing pool house and restroom facilities.

View of the southeast side of the existing fenced aquatics facility and pool house.

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Source: Facilitron

COVINA HIGH SCHOOL
POOL REHABILITATION PROJECT

Site Photographs

Figure 3

Zoning and General Plan Land Use Designation

Covina High School has a designated City of Covina General Plan land use of School and is zoned Single Family Residential R-1-7500, which permits residential developments with a minimum lot of 7,500 square feet and schools. The high school is an allowed land use under the existing zone.

Project Site and Surrounding Facilities Operations

The entire Project site is used for Covina High School's recreational and physical education (PE) programs. The basketball court immediately to the north of the aquatic facility is one of four outdoor courts, mainly used during lunch break and PE classes. Additional basketball courts are in the gymnasium, immediately east of the aquatic facility.

The aquatic facility is used for the Covina High School swimming program, which holds regular practices Monday through Saturday, 3 PM to 6 PM, except on days with swim meets. The 2022-23 schedule for swim meets, shown in Table 1, is typical of existing pool operations. When not used by the Covina High School or District, the aquatic facility, along with other facilities on the campus, are leased to community groups via the Civic Center Act.

Table 1: 2022-23 Swim Meet Schedule

Date	Type	Time	Location
2/22/2023 (Wed)	Non-League	3:30 PM	Away
2/25/2023 (Sat)	Tournament	10:00 AM	Away
3/1/2023 (Wed)	Non-League	3:30 PM	Away
3/7/2023 (Tues)	Non-League	3:15 PM	Home
3/15/2023 (Wed)	League	3:30 PM	Home
3/22/2023 (Wed)	League	3:30 PM	Home
3/29/2023 (Wed)	League	3:30 PM	Home
4/12/2023 (Wed)	League	3:30 PM	Away
4/25/2023 (Tues)	League Preliminaries	2:00 PM	Away
4/27/2023 (Thurs)	League Finals	2:00 PM	Away
5/23/2023 (Tues)	Reservation	4:00 PM	Home
5/24/2023 (Wed)	Reservation	4:00 PM	Home
5/25/2023 (Thurs)	Reservation	4:00 PM	Home
5/26/2023 (Fri)	Reservation	4:00 PM	Home
Note: Away games were held at an opponent school. Home games were held at Covina High School.			

Project Description

The District proposes to rehabilitate the swimming pool facility at Covina High School to meet current California Interscholastic Federation (CIF) standards for competitive high school swimming, diving, and water polo.

Proposed Aquatic Center

Figure 4, *Site Plan*, shows the proposed improvements on the high school campus. With the exception of the exterior of the pool house, all existing facilities within the Project site would be demolished. The exterior concrete masonry walls of the pool house would be retained and would be prepared for exterior improvements. The interior of the pool house would be modernized to accommodate only pool equipment. As shown in Figure 5, *Rendering of Building Exterior,* three double doors on the east side of the building would provide access into the renovated pool equipment

room. The existing doors to the male and female restrooms on the western elevation would be removed and replaced with a continuous wall (see Figure 6, *Rendering of Swimming Pool*).

A new 1,700-square-foot building would be constructed north of the renovated pool equipment room. As shown in Figures 4 and 5, the main entrance into the aquatic facility would be via an entrance with an awning, between the pool equipment room and the restroom building. The new building would include five outdoor showers, located between the entrances into the male and female restrooms and changing facilities, facing the pool. It would also include a concessions room, office, and storage room.

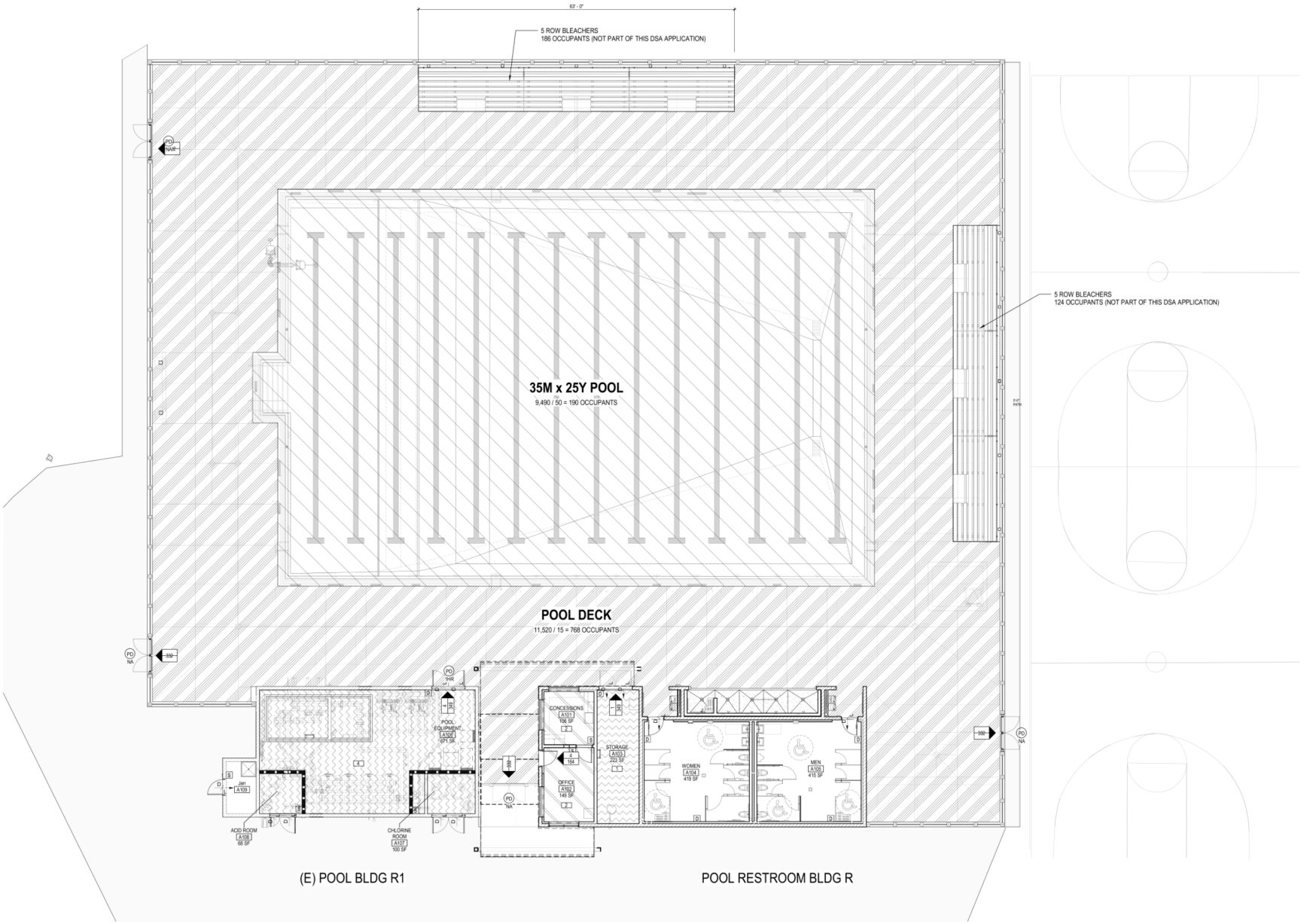
The proposed aquatic facility would include an approximately 35-meter x 25-yard rectangular pool. The pool would include 13 swim lanes and accommodate up to 190 occupants. The pool would be surrounded by a concrete deck on all four sides. Two aluminum bleachers, each with 5 rows and seating for up to 310 spectators, would be installed on the west and north sides of the pool. As shown in Figure 6, a shade structure would be constructed over each bleacher stand. A light-emitting diode (LED) video display scoreboard would be installed at the south end of the pool.

Exterior lighting would be installed for morning and evening use of the aquatic facility. The lights would be shielded and directed down to prevent light from spilling over onto sensitive uses, as Covina High School is surrounded by roads and residential uses on all sides. Underwater lights would also be installed in the pool. A 16-foot-tall concrete wall would be installed on the southern perimeter of the aquatic facility. A 6-foot-high ornamental iron fence would be installed along the western and northern perimeters. Three egress-only gates would be provided, two from the southern wall, and one in the northeast corner. The main entrance to the proposed aquatic facility would be located on the northeast side of the building, across from the existing gymnasium, as shown in Figure 5.

Utilities and systems for the proposed aquatic facility, including potable water, sewer, electricity, fire alarm, communications, and storm drains, would be connected to the campus's existing facilities. A fire hydrant located south of the existing pool would be replaced in order to meet current fire safety standards and water pressure requirements. A new water line would be installed to connect the new fire hydrant to a water main under Rowland Street. The water line would be installed within an existing walkway south of the aquatic center and east of the field and tennis courts. Construction activities for the water line would include excavation or trenching, sheeting or shoring as necessary, compaction with backfill, grading, and paving.

All improvements would comply with the latest applicable Title 24 Building Standards Code, which includes the Building Code (Part 2), Fire Code (Part 9), Energy Code (Part 6), and CALGreen Code (Part 11), as well as with Americans with Disabilities Act (ADA) and District standards. The Project would be designed to include the following sustainable features:

- Increased insulation values in walls and attic spaces.
- Installation of high-efficiency windows and doors.
- Installation of efficient heating, ventilation, and air conditioning systems.
- Use of Energy Star products.
- Installation of low-flow, water-efficient plumbing fixtures for toilets and sinks.
- Installation of tankless water heater systems.
- Installation of LED technology for interior and exterior building areas.
- Use of recycled water for common area landscape irrigation.
- Use of drought-tolerant plants in landscape design to minimize irrigation on-site.
- Installation of low-water irrigation systems with smart sensor controls.



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Not to Scale

Source: DLR Group. April 26, 2023

COVINA HIGH SCHOOL
POOL REHABILITATION PROJECT

Site Plan

Figure 4

View of the east side of the proposed aquatic building from southeast of the Project site. The three red doors would provide access into the pool equipment room.

View of the main entrance of the proposed aquatic facility from northeast of the Project site. The entrance would be located across from the existing gymnasium shown on the left side of the photo.

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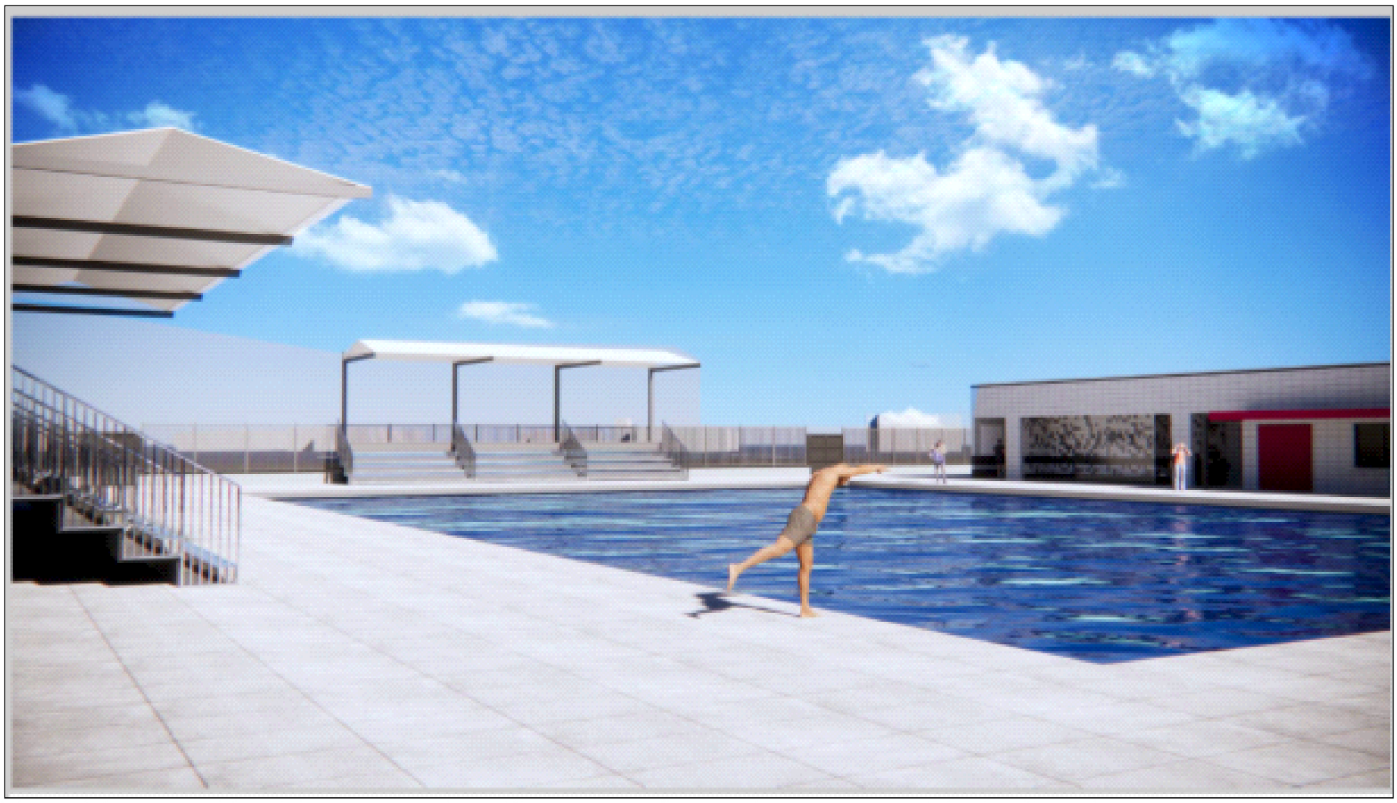
Source: DLR Group. September 9, 2022

COVINA HIGH SCHOOL
POOL REHABILITATION PROJECT

Rendering of Building Exterior

Figure 5

View of the west side of the expanded pool house from the northwest corner of the Project site.



View of the west side of the expanded pool house from the southwest corner of the Project site.

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Michael Baker INTERNATIONAL

Source: DLR Group. September 9, 2022

COVINA HIGH SCHOOL
POOL REHABILITATION PROJECT

Rendering of Swimming Pool

Figure 6

Proposed Operational Changes

The Project would accommodate the existing Covina High School swimming program, as described above under Project Site and Surrounding Facilities Operations. If the high school swim team qualifies, the proposed facility may host CIF championships, which would occur after the spring swim season (see Table 1 for common schedule) and include up to three swim meets per week. These events would not be scheduled at the same time as other large campus-sponsored events. The Project would not cause other operational changes at Covina High School. Similar to existing uses, the new aquatic facility would be available for community use via the Civic Center Act.

Construction

Project construction would commence December 2023 and be completed in January 2025. Site preparation, demolition of existing facilities, and grading would occur from December 2023 to March 2024. Pool construction, paving, interior finishing, and coating would occur between March 2024 and January 2025. The construction staging and laydown area would be on the grass area west of the Project site. Construction vehicle access to the Project site would be from a fire access road from the campus's southeast lot.

During construction, the Covina High School swim program would be relocated off-site to the Covina Park Aquatic Center at 301 4th Avenue, which is 0.7 miles northeast of the campus. The program would return to Covina High School in the 2024-25 school year, after the new aquatic facility is constructed.

Construction Best Management Practices and Regulatory Compliance

The following best management practices (BMPs) would be implemented during construction as required by local and regional regulations, which would serve to further reduce the Project's construction-related impacts on the environment, surrounding community, and school operations:

» The construction manager will work with the Covina High School principal and District administrators to schedule activities in a manner that would be least disruptive to school and classroom operations. To the extent possible, noisy construction activities would be scheduled when students are not on campus.

» Construction hours would adhere to the City of Covina Municipal Code Section 9.40.110, which permits construction Monday through Saturday, between 7:00 AM and 8:00 PM, and prohibits construction on Sundays and public holidays.

» The Project site and construction staging and laydown areas would be fenced with green screening to limit potential views, trespassing, and vandalism. The existing storm drain inlets would be protected, and fiber rolls would be placed along the interior perimeters of the fenced areas. Construction vehicles accessing the staging area and construction area would be stabilized and installed with a tire wash.

» An erosion control plan would be prepared that would identify erosion control BMPs to improve stormwater discharge and protect receiving water quality. Disturbed areas left inactive for seven days or more would be seeded to minimize erosion.

» The Project would be subject to rules and regulations enforced by the South Coast Air Quality Management District (SCAQMD), which would limit the release of construction-related pollution into the air and waterways.

- **Rule 402 (Nuisance).** This rule prohibits the discharge "from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property." This rule does not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

- **Rule 403 (Fugitive Dust).** This rule requires fugitive dust sources to implement best available control measures for all sources, and prohibits all forms of visible particulate matter (PM) from crossing any property line. This rule is intended to reduce PM_{10} emissions from any transportation, handling, construction, or storage activity that has the potential to generate fugitive dust. PM_{10} suppression techniques are summarized below.
  a) Portions of a construction site to remain inactive longer than a period of three months will be seeded and watered until grass cover is grown or otherwise stabilized.
  b) All on-site roads will be paved as soon as feasible or watered periodically or chemically stabilized.
  c) All material transported off-site will be either sufficiently watered or securely covered to prevent excessive amounts of dust.
  d) The area disturbed by clearing, grading, earthmoving, or excavation operations will be minimized at all times.
  e) Where vehicles leave a construction site and enter adjacent public streets, the streets will be swept daily or washed down at the end of the workday to remove soil tracked onto the paved surface.
- **Rule 1113 (Architectural Coatings).** This rule requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce reactive organic gases (ROG) emissions from the use of these coatings, primarily by placing limits on the ROG content of various coating categories.

Categorical Exemption

Applicable Categorical Exemption Classes

The CEQA Guidelines includes classes of projects that have been determined to not have a significant effect on the environment and that can be categorically exempt from extended environmental review. As discussed below, the Project qualifies for a categorical exemption under Classes 2, 4 and 14.

Class 2, Replacement or Reconstruction

Class 2 consists of 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," involving negligible or no expansion of capacity (CEQA Guidelines Section 15302).

The Project would replace the existing swimming pool facility at Covina High School to meet CIF standards. The exterior of the existing pool house would be retained and the interior modernized to accommodate only pool equipment; all other improvements, including the pool and deck, would be reconstructed within the general footprint of the existing pool-related facilities on the campus. The increased size of the pool, as required by CIF standards, would not result in substantially greater use. Although larger than the existing pool (approximately 23-meter x 14-yard) and with increased capacity, the aquatic facility would have substantially the same purpose and operations as under existing conditions. It would continue to serve the existing student population and high school aquatics program and be available for community use. Should the Covina High School swim team be eligible for CIF championships, championship meets may occur at the campus. These would be scheduled after the normal spring swim season and include up to three meets per week. The increased use would involve a negligible change from the existing level of use of the campus.

Class 4, Minor Alterations to Land

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" (CEQA Guidelines Section 15304).

The proposed improvements would require ground-disturbing activities, such as excavation and grading for the new aquatics facility, utilities, and path accessibility improvements. All ground-disturbing activities would occur in previously disturbed areas. All areas disturbed by the Project would be restored with new pavement and structures to minimize erosion and to allow for continued school operations. The Project would not require the removal of any trees.

Class 14, Minor Additions to School

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 percent or ten classrooms, whichever is less. The addition of portable classrooms is included in this exemption" (CEQA Guidelines Section 15314).

The Project includes the rehabilitation of existing swimming pool facilities on a high school campus. The Project would not add new classrooms or increase student capacity at Covina High School. Therefore, the school enrollment capacity would remain the same as under the existing conditions.

Exceptions to Categorical Exemptions

CEQA Guidelines Section 15300.2 lists conditions under which categorical exemptions are inapplicable:

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.

The discussion below addresses whether these conditions apply. The Project is reviewed below for characteristics or circumstances that may invalidate the potential to exempt the Project from further environmental evaluation.

a) Location

Section 15300.2(a) of the CEQA Guidelines states that classes 3, 4, 5, 6, and 11 are qualified by consideration of whether the project is 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.

According to the Safety Element of the City of Covina General Plan, the City contains no major earthquake faults, but may still experience ground shaking from faults in the vicinity.[1] The City also has low risk for ground failure hazards (liquefaction, settlement, and subsidence) due to its predominantly flat and stable geology. According to the California Geological Survey's Earthquake Zones of Required Investigation map, the Project site is not within a fault zone, liquefaction zone, or landslide zone.[2] Although areas of the City are susceptible to seiches due to the Puddingstone Reservoir and Dam Complex, located at 120 East Via Verde Park Drive in the City of San Dimas, which is approximately 5.1 miles east of the Project site, the Project site is located outside of the inundation map for this reservoir, and thus would not be at significant risk for seiches and flooding.[3] In addition, according to the Federal Emergency Management Agency's FIRMette 06037C1700F, the Project site is located in Zone X (Area of Minimal Flood Hazard).[4]

The Natural Resources and Open Space Element of the City's General Plan states that the City is almost completely built out and has experienced much urbanization. The largest number and greatest diversity of species occur in the Covina Hills area, located approximately 1.8 miles southeast of the Project site.[5] Due to the distance, the Project would not affect the Covina Hills area of the City. In addition, according to the US Fish and Wildlife Information for Planning and Consultation (IPaC) report, there are no critical habitats located within the Project site.[6] Although the IPaC report lists the coastal California gnatcatcher (*Polioptila californica californica*), least Bell's vireo (*Vireo bellii pusillus*), southwestern willow flycatcher (*Empidonax traillii extimus*), and monarch butterfly (*Danaus plexippus*) as threatened, endangered, or candidate species that may be affected by activities at the Project site, the Project site does not provide suitable habitat for these species as it is fully developed with the existing high school campus. The IPaC report also lists 19 bird species protected under the Migratory Bird Treaty Act. However, the Project would not remove any trees and improvements are proposed in disturbed areas of the campus. Thus, the Project would not impact potential nesting habitat for protected birds. In addition, the Project would implement BMPs to reduce any potential impacts to sensitive habitat and species, including an erosion control plan, and SCAQMD Rules 402, 403, and 1113.

The Project site is not within other areas of unique sensitive environments of hazardous or critical concern, including mineral resources, noise, or wildfire. The Natural Resources and Open Space Element further states that the City does not contain active mining operations, significant areas of mineral deposits, or significant energy-producing minerals.[7] As shown on the San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations map created by the California Department of Conservation, the Project site is not located within Mineral Resource Zone 2, or areas that contain identified mineral resources.[8] According to the Noise Element of the City's General Plan, the Project site is not located within a sensitive area for noise.[9] In addition, the Project would implement BMPs to reduce potential impacts

[1] City of Covina, General Plan Safety Element, 2000, page E-3.
[2] California Department of Conservation, Earthquake Zones of Required Investigation, accessed June 16, 2023, https://maps.conservation.ca.gov/cgs/eqzapp/app/.
[3] California Department of Water Resources, Inundation Maps, accessed June 16, 2023, https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2.
[4] Federal Emergency Management Agency, FIRMette 06037C1700F, September 2008, accessed June 16, 2023, https://msc.fema.gov/portal/search.
[5] City of Covina. April 2000. General Plan Natural Resources and Open Space Element. Page D-7.
[6] United States Fish and Wildlife Service, Information for Planning and Consultation, accessed June 16, 2023, https://ipac.ecosphere.fws.gov/.
[7] City of Covina, General Plan Natural Resources and Open Space Element, 2000, page D-9.
[8] California Department of Conservation, San Gabriel Valley P-C Region Showing MRZ-2 Areas and Active Mine Operations, 2010.
[9] City of Covina, Noise Element, 2000, pages F-8 through F-12.

from construction noise, including the construction contractor coordinating with the District to schedule activities in a manner that would be least disruptive to school and classroom operations, and construction hours that would adhere to the City of Covina Municipal Code Section 9.40.110.

According to the Fire Hazard Severity Zones (FHSZ) in the State Responsibility Area map managed by the California Department of Forestry and Fire Protection, the Project site is not located within a FHSZ; the closest area within an FHSZ is the Covina Hills area, located approximately 1.8 miles southeast of the Project site.[10] Furthermore, the Project site is not located on or near a designated hazardous waste site; see Section (e) below. Therefore, CEQA Guidelines Section 15300.2(a) does not apply to the Project.

b) Cumulative Impact

Exemptions are inapplicable when there is a significant cumulative impact of "successive projects of the same type in the same place, over time" (Section 15300.2[b]).

Other than the improvements identified in the Project description of this document, there are no other successive projects proposed on the Project site. As the environmental effects of the Project would comply with applicable federal, state, and local laws and regulations and on an individual basis would not be significant, the environmental effects would not combine to cause cumulatively considerable effects. Therefore, CEQA Guidelines Section 15300.2(b) does not apply to the Project.

c) Significant Effects

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. 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 the unusual circumstances. The lead agency is required to consider the second question only if it finds that some circumstance of the project is unusual (*Berkeley Hillside Preservation v City of Berkeley* (2015) 60 C4th 1086, 1104).

The Project presents no unusual circumstances or special environmental constraints during Project planning, construction, or operation that could lead to a significant impact. There are no unusual environmental circumstances related to the development footprints, and construction methods would be typical for public school facilities and comply with the Building Code (Part 2), Fire Code (Part 9), Energy Code (Part 6), and CALGreen Code (Part 11), as well as with ADA and District standards. The Project would also comply with applicable water quality and air emissions rules and standards and BMPs required for construction. No unusual circumstances are expected to occur from Project implementation. CEQA Guidelines Section 15300.2(c) does not apply to the Project.

d) Scenic Highways

A categorical exemption shall not be used for a project that may damage scenic resources—including but not limited to trees, historic buildings, rock outcroppings, or similar resources—within an officially designated state scenic highway.

The closest scenic highway is Route 210/Route 2, an eligible scenic highway, approximately 2.8 miles northeast of the Project site.[11] Due to the distance, Project implementation would not have the ability to impact the eligible scenic highway. Therefore, CEQA Guidelines Section 15300.2(d) does not apply to the Project.

[10] California Department of Forestry and Fire Protection, Fire Hazard Severity Zones Maps, accessed June 26, 2023, https://osfm.fire.ca.gov/fire-hazard-severity-zones-maps-2022/.
[11] California Department of Transportation, California State Scenic Highway System Map, 2019, accessed June 26, 2023, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa.

e) Hazardous Waste Sites

Subsection 15300.2 of the CEQA Guidelines states that a categorical exemption shall not be used for a project on a site that is on any list compiled pursuant to Section 65962.5 of the California Government Code. Section 65962.5 specifies lists of hazardous materials sites—hazardous waste facilities; hazardous waste discharges for which the State Water Resources Control Board (SWRCB) has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated.

To determine if the site is on a list compiled by Section 65962.5, a review of the following data resources, also known as the Cortese list, was conducted:

- List of Hazardous Waste and Substances sites from the California Department of Toxic Substances Control (DTSC) online EnviroStor database[12]
- List of Leaking Underground Storage Tank (LUST) sites from the California SWRCB online GeoTracker database[13]
- California Environmental Protection Agency (CalEPA):[14]
  - List of solid waste disposal sites identified by the SWRCB with waste constituents above hazardous waste levels outside the waste management unit
  - List of "active" Cease and Desist Orders and Cleanup and Abatement Orders from the SWRCB
  - List of hazardous waste facilities subject to corrective action pursuant to Section 25187.5 of the Health and Safety Code, identified by the DTSC

A search of these databases determined that the Project site is not on a list of hazardous waste facilities compiled by Section 65962.5 of the California Government Code. The DTSC EnviroStor database shows no hazardous sites within 2,000 feet of the Project site. The SWRCB GeoTracker database shows two LUST sites within 2,000 feet of the Project site; however, the cleanup activities of both sites are listed as "Completed – Case Closed." The CalEPA lists do not identify the Project site nor sites within the Project vicinity as hazardous sites. Therefore, CEQA Guidelines Section 15300.2(e) does not apply to the Project.

f) Historic Resources

A categorical exemption cannot be used for a project that may cause a substantial adverse change in the significance of a historical resource, as specified in Public Resources Code Section 21084.1, which defines a resource as one listed in or determined to be eligible for listing in the California Register of Historical Resources and local register of historical resources. A Cultural Resources Evaluation was prepared for Covina High School. Based on a field survey and evaluation of existing school buildings, records and literature searches conducted for the campus, Native American consultation, and archaeological sensitivity assessments, the evaluation determined that the sensitivity for buried archaeological resources on the Project site is low, and the Project would not result in adverse effects to historic resources.[15] Therefore, CEQA Guidelines Section 15300.2(f) does not apply to the Project.

[12] Department of Toxic Substances Control, EnviroStor, accessed June 27, 2023, https://www.envirostor.dtsc.ca.gov/public/.
[13] California State Water Resources Control Board, GeoTracker, accessed June 27, 2023, https://geotracker.waterboards.ca.gov/.
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Conclusion

As documented herein, the Project meets the requirements of Categorical Exemption Class 2, *Replacement or Reconstruction*, Class 4, *Minor Alterations to Land,* and Class 14, *Minor Additions to Schools,* and none of the conditions listed in CEQA Guidelines Section 15300.2, *Exceptions*, apply. Accordingly, the Project is exempt from extended environmental review in accordance with the provisions of CEQA.

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