2018038267

CEQA: California Environmental Quality Act

NOTICE OF EXEMPTION

To: ☒ Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, CA 95814

☒ County Clerk
County of Orange
12 Civic Center Plaza, Room 101
Santa Ana, CA 92701

From: (Public Agency)
Orange Unified School District
1401 North Handy Street
Orange, CA 92867

Orange High School Modernization Project
Project Title

Orange High School, 525 North Shaffer Street, City of Orange. Assessor's Parcel Numbers (APNs) 386-241-08, -09, and -10, and 386-231-17.
Project Location - Specific

Orange
Project Location – City

Orange
Project Location – County

The proposed project is the modernization of Orange High School (OHS). The improvements would be constructed in two phases. Phase 1 would be implemented in two increments. Increment 1 improvements include demolition of a snack bar and shed; relocation of five portables; construction of a new one-way driveway for school bus loading, a satellite kitchen, and a utility yard; and modification of rear service windows on the existing cafeteria. Increment 2 improvements include demolition of the eastern parking area and construction of a new 42,300-square-foot Science, Technology, Engineering, and Math building.

Phase 2 would be implemented under one of two scenarios: In Scenario A, buildings 100 and 200 would be demolished and reconstructed. In Scenario B, the interiors of buildings 100 and 200 would be renovated. Under either scenario, 14 existing portable classrooms in the eastern portion of the campus would be removed. The project improvements would benefit the students, staff, and visitors of OHS and improve operation of the school program. Construction would begin the summer of 2018 and would be completed prior to the start of the 2022-23 school year.
Description of Nature, Purpose, and Beneficiaries of Project

Orange Unified School District
Name of Public Agency Approving Project

Orange Unified School District
Name of Person or Agency Carrying Out Project

Exempt Status: (check one below)

- ☐ 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: §15314
- ☐ Statutory Exemptions. State code number:

See attachment or discussion why project is exempt.
Reasons why project is exempt

Ronald Lebs
Lead Agency/Contact Person:

(714) 628-4000
Area Code/Telephone/Extension:

If filed by applicant:

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

Date Received for Filing:

Signature: Title: Assistant Superintendent Date: 3/8/18

Governor's Office of Planning & Research

☒ Signed by Lead Agency

☒ Signed by Applicant

MAR 12 2018

STATE CLEARINGHOUSE

APPLICABILITY OF CATEGORICAL EXEMPTION
ORANGE HIGH SCHOOL MODERNIZATION PROJECT

This document assesses the applicability of exempting facility improvements proposed at Orange High School (proposed project) from expanded environmental review pursuant to the California Environmental Quality Act (CEQA), under California Public Resources Code Section 21084 and CEQA Guidelines Sections 15300 and 15314 (California Code of Regulations Title 14 Sections 15000 et seq.).

1. Project Location

The project site is on the Orange High School campus (OHS) at 525 North Shaffer Street in the City of Orange, in western Orange County. The campus encompasses Assessor's Parcel Numbers (APNs) 386-241-08, -09, and -10, and 386-231-17. Regional access to the site is provided by California State Route 55 (SR-55), approximately 0.75 mile east of the project site. Figure 1, *Regional Location*, and Figure 2, *Local Vicinity*, show the project site in its regional and local context.

2. Existing Setting

Facilities

OHS is a 34-acre campus that was originally constructed in 1952. The campus is flat and generally rectangular in shape. It currently has 76 classrooms, a gymnasium, library, indoor and outdoor theaters, pool, student center, cafeteria, agriculture/livestock area, tennis courts, athletic fields and courts, snack bar, and two general parking areas (western and eastern). Figure 3, *Aerial Photograph*, and Figure 4, *Site Photographs*, show the existing conditions of OHS. Figure 5, *Existing Facilities*, is a map of the campus.

Parking

The school has two parking areas. The western parking area comprises three lots totaling 210 spaces. The lots are separated by east-west fencing. The northern lot is for students (113 spaces), the middle lot is for faculty (88 spaces), and the southernmost lot is for visitors (9 spaces). The eastern parking area is used by faculty only and has a total of 66 spaces.

On-street public parking is available on the southern and western sides of OHS. The northern side of East Walnut Avenue has 43 angled parking stalls. The eastern side of North Shaffer Street has parallel parking space for approximately 42 vehicles, assuming a length of 20 feet per vehicle—up to17 spaces in the loading area, and approximately 25 spaces north of the loading area along the rest of the school frontage.

Vehicular Access

Four driveways provide vehicular access to the school: one driveway on North Harwood Street to the eastern parking lot, and three driveways on North Shaffer Street to the western parking area (see Figure 3). One driveway gives access to each of the three parking lots.

OHS has two different bus programs. The small buses for special education bus program load and unload students along the west side of Harwood Street and make a U-turn at the cul-de-sac to park along the east side of Harwood Street.

Regular students who participate in the bus pass program are dropped off on the east side of Schaffer Street in the morning, early enough that, after the buses leave, the area can be used for student unloading from personal

vehicles. In the afternoon, buses enter the campus through the visitor parking lot and park along an internal fire road for bus loading, south of the school gymnasium (see Figure 5).

School Enrollment and Capacity

OHS serves grades 9 through 12 and currently has an enrollment of 1,747 students. Table 1 shows student enrollment at OHS over the last 10 years. Due to annual changes in enrollment, OHS has experienced a 10-year average of 2,027 students; its highest enrollment was in the 2008-09 school year with 2,445 students.

Table 1 Orange High School 10-Year Enrollment History

School Year	Enrollment
2017-18	1,747[1]
2016–17	1,811
2015–16	1,889
2014–15	1,927
2013-14	1,895
2012-13	1,910
2011-12	2,089
2010-11	2,181
2009-10	2,375
2008-09	2,445
10-Year Average Enrollment:	**2,027**

Source: CDE, Enrollment Report (CDE 2017).
[1] Orange Unified School District, December 2017.

The Orange Unified School District's (District) Orange High School Facilities Master Plan recommends a classroom loading capacity of 40 students per classroom, with a goal of 32 students per classroom (OUSD 2014). Therefore, OHS has an existing maximum enrollment capacity of 3,040 seats (76 classroom x 40 seats/classroom).

3. Proposed Project

The proposed project is the modernization of Orange High School. The improvements would be constructed in two phases, and Phase 1 would be implemented in two increments. All improvements would be constructed in accordance with the Americans with Disabilities Act (ADA) and the 2016 California Building Code. The proposed improvements are shown in Figure 6, *Conceptual Master Plan*.

Phase 1, Increment 1

Phase 1, Increment 1 improvements would:

» Demolish existing snack bar and shed.

» Relocate five portables from the center of the site to an area between the athletic fields and agriculture and livestock area.

» Develop a new one-way driveway for school bus loading in the grass lawn at the northwest corner of Walnut Avenue and Harwood Street. Ingress would be via a new curb-cut from North Harwood Street, south of the

existing 400 building. A new right-turn-only egress on East Walnut Avenue, approximately 220 feet west of Harwood Street, would result in the loss of three on-street parking spaces. Operations of the bus pass program would be relocated to the new bus loading area; special education bus and personal vehicle passenger loading operations would remain unchanged.

» Construct a new satellite kitchen and outdoor dining area near the center of the campus.

» Construct an approximately 800-square-foot utility yard to service the existing school and proposed improvements in a grass area east of the visitor parking lot.

» Modify and recommission rear service windows on the existing cafeteria building.

Phase 1, Increment 2

Phase 1, Increment 2 improvements would:

» Demolish existing eastern parking area, including all striping, fencing, and curb.

» Construct a new 42,300-square-foot STEM (Science, Technology, Engineering and Math) building. The STEM building would be two stories (39 feet 6 inches high) and would house 4 chemistry laboratories, 8 regular science laboratories, 1 general classroom, 2 special education classrooms, and support spaces (15 total classrooms). Visual simulations of the STEM building are shown in Figure 7, *STEM Renderings*.

Phase 2

Phase 2 would be implemented under one of two scenarios: In Scenario A, buildings 100 and 200 would be demolished and reconstructed. In Scenario B, the interiors of buildings 100 and 200 would be renovated. Under either scenario, 14 existing portable classrooms in the eastern portion of the campus would be removed.

Scenario A

Buildings 100 and 200 (16 classrooms) would be demolished, and a new two-story building would be constructed with a similar height as the proposed STEM building. The new building would have 6 classrooms, office administration rooms, a lounge area, storage, and counseling facilities.

Scenario B

The interior walls in buildings 100 and 200 would be demolished, and classroom spaces would be resized and modernized. The renovated buildings would have 10 classrooms and office administration rooms, lounge, and counseling facilities.

Other Site Improvements

The project would include other, smaller improvements around the campus to improve operation of the existing facility and to facilitate function of the proposed improvements:

- All utilities within the limits of the excavation areas would be relocated underground.
- Two new storm drains would be installed:
    - One 8-inch storm drain would connect the northeastern portion of the proposed STEM building to an existing catch basin on North Shaffer Drive.

- One 8-inch storm drain would connect the southern portion of the STEM building to the other proposed storm drain.

- Three new fire hydrants would be installed: north of the 800 buildings, west of the STEM building, and between the STEM Building and Building 500.
- A new fire-water line would be installed underground and would connect the northernmost proposed fire hydrant to an existing fire hydrant on Walnut Avenue, adjacent to the proposed new egress driveway.
- 3-inch water and 6-inch sewer lines would be installed east of the STEM building.
- A new fire access lane would be paved through the interior of the campus and would connect North Harwood Street to North Shaffer Street and the grass playfields.

Construction

Phase 1

Construction of Phase 1 improvements would commence fall 2018 and be completed in 2020. After Phase 1 is complete, the campus would have 91 classrooms with a maximum enrollment capacity of 3,640 seats. The additional classrooms and seating capacity would be used as swing space for Phase 2 improvements. Phase 1 would also remove 56 trees.

Phase 2

Construction of the Phase 2 improvements would likely commence fall 2020, after completion of Phase 1. Phase 2 improvements would be completed for the beginning of the 2022-23 school year or soon thereafter. With the removal of 14 portable classrooms under Phase 2, the project would result in an overall reduction in seating capacity under either Scenario A or B.

Operation

During Construction

The school operates below capacity under existing conditions (1,747 students and capacity of 3,040 seats); therefore, construction of the Phase 1 improvements would not impact classroom operations or classroom capacity. If needed, some students may be moved to underutilized portables on the campus. Programs and classes displaced by Phase 2 project improvements in the 100/200 classrooms would be relocated to the new STEM building and existing portable classrooms. The installation of new portable structures would not be required for the proposed project.

Post-construction

Following the improvements, OHS would have either 67 or 71 classrooms and a capacity of either 2,680 or 2,840 students under Scenarios A and B, respectively. The proposed project would have a net reduction of 9 classrooms (360 seats) under Scenario A, or 5 classrooms (200 seats) under Scenario B. The school would continue to operate on a traditional calendar, and school hours would remain the same. The school would continue to have nighttime events and would be available for community use through the Civic Center Act, similar to existing operations.

4. Applicability of Categorical Exemption

The CEQA Guidelines lists classes of projects that have been determined not to have a significant effect on the environment and can be exempted from the provisions of CEQA. The proposed project qualifies for an

exemption from further environmental documentation under categorical exemption Class 14, Minor Additions to Schools (CEQA Guidelines § 15314). 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 10 classrooms, whichever is less.

The project would result in construction of a new 42,300-quare-foot STEM building, satellite kitchen, utility yard, bus loading area, and either construction of a new 100/200 building or renovation of the existing buildings. Below are the following capacity and classroom scenarios for Scenarios A and B.

Scenario A

Following the Scenario A improvements, OHS would have 67 classrooms and a capacity of 2,680 seats. This would reduce the number of classrooms by 9 or 360 seats (approximately 11.8 percent), less than the limit of 10 classrooms or 25 percent specified under Class 14.

Scenario B

Following the Scenario B improvements, OHS would have 71 classrooms and a capacity of 2,840 seats. This would reduce the number of classrooms by 5 or 200 seats (approximately 6.6 percent), less than the limit of ten classrooms or 25 percent specified under Class 14.

5. Exceptions to Categorical Exemptions

Section 15300.2, Exceptions, of the CEQA Guidelines provides conditions under which categorical exemptions are inapplicable. The proposed project has been reviewed under Section 15300.2 for characteristics or circumstances that might invalidate findings that the proposed project is exempt.

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 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. The proposed improvements qualify for a categorical exemption under Class 14. Notwithstanding, the entire project site is improved with a high school campus within an urban community. The school site has not been designated, mapped, or listed by federal, state, or local agencies as an area of hazardous or critical concern. The proposed improvements would not be constructed in a sensitive environment. This exception does not apply to the proposed 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." Beyond the proposed project, the District has no other planned improvements at OHS. The District proposes similar school modernization improvements at other District high schools; however, they are not near OHS. The nearest high schools are Villa Park and El Modena high schools, which are approximately 1.75 miles northeast and southeast of OHS, respectively. Environmental effects caused by the modernization improvements at each high school site would be localized and not within range of project effects at the other school sites; e.g., the improvements would not be within visual or auditory range of each other. 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 would not result in a significant adverse environmental impact and would not be cumulatively considerable. Additionally, there are no related projects near OHS 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 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 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 C4th 1086, 1104.

The proposed facility improvements at OHS are not atypical. The proposed project would be confined to the existing campus and adjoining roadway segments. The new buildings would be within the general footprints of those existing or within the interior of the campus. The height and architecture of the buildings would be consistent with the existing campus and surrounding development. The facility improvements and the anticipated construction methods would be common for school facility construction 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.

The OHS campus is in disrepair, and with Measure S bond proceeds, the District will be able to update the campus to current safety standards and meet OHS programming needs. The proposed improvements must adhere to the limits of the voter-approved bond, which allows for improvements within the existing campus, including new classrooms and labs for career education and advanced science courses; enhancement of instructional technology throughout campus; retrofitting of buildings for earthquake safety; and upgrades to core infrastructure, campus security and emergency systems.

OHS accommodates an attendance area that is built out, and the District does not forecast substantial enrollment growth at the school or District. Furthermore, project implementation would result in an overall reduction in the enrollment capacity at the campus with the removal of older permanent and portable classrooms. Therefore, while the project would cause some expected construction-related environmental inconveniences, the project would improve existing operations, and therefore not cause significant operational impacts, as further substantiated below.

There are no known unusual circumstances related to the project site or the proposed project, and there is also no reasonable possibility that the project would cause a significant effect on the environment; see below discussion, which concludes that the proposed project would not result in direct or indirect potentially significant 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. This exception does not apply to the proposed project.

(1) **Aesthetics.** There are no scenic vistas or protected views on or near the project site. The closest officially designated scenic highway is a segment of State Route 91 (SR 91), approximately 3.25 miles north of the site (Caltrans 2011). Due to the distance and intervening structures, the project would not affect the highway's scenic value.

The proposed improvements would alter views of the OHS campus; however, the buildings and architecture styles would be similar to other campus structures and the surrounding developed

neighborhood, including aesthetic features at nearby Chapman University. The project includes two-story buildings that would be similar heights as existing school buildings and surrounding residences. The proposed improvements would not significantly alter or reduce views into or away from the site.

New permanent light sources include interior building and exterior security lights associated with the new buildings and parking area. The amount of illumination created from the building and security lights would be similar to what already exists on the campus and would not create a substantial amount of light or glare that would affect day or nighttime views.

(2) **Agriculture and Forestry Resources.** The project site is developed as a school and contains no farmland. The project is classified as Urban and Built-Up Land according to the Farmland Mapping and Monitoring Program (CDC 2017). The site is not under a Williamson Act contract (CDC 2016).

(3) **Air Quality.** Construction would occur throughout the school year and be phased to accommodate ongoing OHS program. Demolition of existing structures and construction of improvements would comply with best management practices and South Coast Air Quality Management District's (SCAQMD) rules and regulations:

- **Rule 401, Visible Emissions.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in visible emissions. Specifically, the rule prohibits the discharge of any air contaminant into the atmosphere by a person from any single source of emission for a period or periods aggregating more than three minutes in any one hour that is as dark as or darker than designated No. 1 on the Ringelmann Chart, as published by the U.S. Bureau of Mines.

- **Rule 402, Nuisance.** This rule is intended to prevent the discharge of pollutant emissions from an emissions source that results in a public nuisance. Specifically, this rule prohibits any person from discharging quantities of air contaminants or other material from any source such that it would result in an injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public. Additionally, the discharge of air contaminants would also be prohibited where it would endanger the comfort, repose, health, or safety of any number of persons or the public, or that cause, or have a natural tendency to cause, injury or damage to business or property.

- **Rule 403, Fugitive Dust.** This rule is intended to reduce the amount of particulate matter entrained in the ambient air as a result of anthropogenic (human-made) fugitive dust sources by requiring actions to prevent, reduce, or mitigate fugitive dust emissions. Rule 403 applies to any activity or human-made condition capable of generating fugitive dust, and requires best available control measures to be applied to earth moving and grading activities.

- **Rule 1113, Architectural Coatings.** This rule limits the VOC content of architectural coatings used on projects in the SCAQMD. Any person who supplies, sells, offers for sale, or manufactures any architectural coating for use on projects in the SCAQMD must comply with the current VOC standards set in this rule.

(4) **Biological Resources.** Proposed improvements would be made on an existing school campus that does not contain any sensitive biological resources. There are no riparian habitat or wetlands onsite. Construction of the proposed improvements would not modify habitat for any species identified as candidate, sensitive, or special status in local or regional plans. The project site is within the plan area of the County of Orange Natural Community Conservation Plan, but the site is not within an area designated

with citywide biological resources or environmentally sensitive habitat. Removal of trees and other ornamental vegetation around the site would comply with the Migratory Birds Treaty Act.

(5) **Cultural Resources.** An Architectural History Inventory and Evaluation Report was prepared for the proposed project and determined that OHS is not listed on and is not eligible for listing on an official local register of historical resources, California Register of Historical Resources, or National Register of Historic Places (ECORP 2018). Ground disturbance from construction of the proposed project would not be substantial and would be within the footprint of the previously graded areas. It is unlikely that archaeological, paleontological, or other subsurface cultural resources would be uncovered. Nevertheless, if resources are uncovered during construction, the District will comply with all applicable laws and regulations, including CEQA Guidelines Section 15064.5(f), which requires lead agencies to make provisions for the accidental discovery of historical or unique archaeological resources during construction.

(6) **Geology/Soils.** According to the California Geological Survey's Fault Activity Map of California, Public Safety Element of the City of Orange General Plan, and Geotechnical Report prepared for the project, there are no Alquist-Priolo faults within the City of Orange planning area (CGS 1998; Orange 2010). Southern California is a seismically active region, and the project site would not experience seismic activity that would be abnormal compared to any other area in the region. According to the California Geological Survey's Earthquake Zones of Required Investigation for the Orange Quadrangle (1998), the project site is not within an earthquake-induced landslide hazard zone or liquefaction zone. Construction of the improvements would be in accordance with the project-specific Geotechnical Report and would be reviewed for compliance with the California Building Code, plan-checked by the Division of the State Architect, and reviewed by a qualified inspector.

(7) **Greenhouse Gas Emissions.** Emissions generated from construction would be de minimis on a regional level. The project is not expected to exceed the SCAQMD bright-line threshold of 3,000 metric tons of carbon-dioxide-equivalent emissions per year. Consequently, the project's contribution to greenhouse gas emissions would also be de minimis. The proposed project would not conflict with adopted plans, policies, or regulations related to greenhouse gas emissions.

(8) **Hazards and Hazardous Materials.** The proposed improvements would be constructed in a manner consistent with federal, state, and local health and safety requirements. A Phase I Environmental Site Assessment that was prepared for proposed project determined that no recognized environmental conditions exist at the campus, and the existing school site is not on a current or former disposal site. Project implementation would improve emergency access onsite and would not impair or change the operation of emergency response plans or exacerbate wildland fire risk. No new hazards would be created from project implementation.

(9) **Hydrology/Water Quality.** Water quality standards and waste discharge requirements would not be violated as part of implementing the proposed improvements. Construction discharge requirements would be implemented to prevent waste discharge violations. The proposed improvements would not introduce pollutants that would violate water quality standards of the Santa Ana Regional Water Quality Control Board (Region 4).

According to the City of Orange General Plan, the project site is not in an area at risk for flooding (Orange 2010). The project site is on the Federal Emergency Management Agency's Flood Map # 06059C0161J in Flood Zone X, which is outside the 100- and 500-year floodplains (1.0 and 0.2 annual percent chance of flooding) (FEMA 2009). There is no existing or proposed housing onsite, and construction of the improvements would not exacerbate risks associated with flooding at the site. Project implementation

would not expose people or structures to potential flooding risks. Additionally, the project site is not near any large water bodies, water facilities, or slopes; the site would not be subject to seiche, tsunami, or mudflow impacts.

(10) **Land Use/Planning.** The City of Orange General Plan land use designation for the project site is Public Facilities and Institutions and the site is zoned R-1-6. Public schools are conditionally allowed within the R-1-6 zone (Orange 2016). The project site has operated as a school since 1952, and the proposed project would improve existing school facilities and operations. The project is consistent with its land use and zoning designations. The project would not change the operation or use of the site, and therefore would not conflict with existing land use, policy, or regulation. The project would not divide an established community or affect applicable land use and conservation plans, policies, and regulations.

(11) **Mineral Resources.** The project site is not currently used as a mineral recovery site. The project does not propose mining operations, nor would it change the operation of the campus such that it would create an impact on mineral resources.

(12) **Noise.** The project would reduce the capacity of the school and would not result in perceptible operational noise changes at any nearby sensitive receptors. Construction, however, would temporarily elevate the noise levels in the vicinity of the project site. The loudest construction effort in terms of project-related noise would be the new STEM building and reconstruction of the 100/200 buildings if Scenario A is implemented. The proposed STEM building and 100/200 buildings would be surrounded by existing buildings, which would shield a large amount of noise from nearby sensitive receptors. Furthermore, the project would adhere to the City of Orange Municipal Code Section 8.24.020, which limits construction between the hours of 7:00 a.m. and 8:00 p.m. on any day, except for Sundays or federal holidays, when it is prohibited.

(13) **Population/Housing.** The proposed project would not result in the removal or development of new housing. The project would not result in a change in population or in the surrounding area and would not involve the construction of housing.

(14) **Public Services.** The proposed project would not change the operation of the OHS program. The project would reduce the capacity of OHS; therefore, the need for fire, police, and parks would be similar to or less than existing conditions. The project would accommodate the existing enrollment at OHS, and implementation would not impact other schools such that new or altered facilities would be needed. Construction of the proposed improvements may create a brief increase in demand for fire and police protection services. However, construction of the proposed improvements would be short term, and this temporary increase would not warrant new facilities or service personnel.

(15) **Recreation.** The proposed project would not result in the need for additional parks and recreational facilities. Construction of the improvements would not reduce the amount of available recreational space on campus.

(16) **Transportation/Traffic.** Construction-related traffic would be short term and typical for development projects in urban areas. Construction staging would occur on the campus, and construction vehicles and equipment would not be parked on public roadways. The project would maintain emergency access throughout the campus during construction and post-construction.

The project would have a net reduction in the OHS enrollment capacity. Consequently, there would be a concurrent reduction in vehicle trips compared to existing conditions, and no new operational traffic impacts would occur. Additionally, the proposed school bus loading/driveway would improve existing

traffic/transportation conditions at OHS. Development of the separate school bus loading area would reduce vehicle-vehicle and vehicle-pedestrian conflicts and improve safety.

The proposed bus loading zone would result in a loss of three on-street parking spaces on the northern side of East Walnut Avenue, and the proposed science building would displace the eastern parking lot until Phase 2 of the project, when portable buildings in the eastern portion of the campus are removed and the area is redeveloped into a parking lot. A parking assessment was conducted for the proposed project and concluded that the parking demand at OHS is substantially less than the available supply, and that there would be adequate onsite parking during project construction and post-construction. There are no significant traffic, parking, and access impacts, and no unusual circumstances exist.

(17) **Tribal Cultural Resources.** The proposed improvements would not require substantial soil disturbance, excavation, or grading that would exceed depths previously required for original construction of the site. It is unlikely that tribal cultural resources would be uncovered; nevertheless, the District would comply with Public Resource Code Section 5024.1 if resources are discovered during earth-moving activities.

(18) **Utilities/Service Systems.** The proposed project includes a new electrical yard that would replace the existing substandard system and support existing needs and proposed facility improvements. The project also includes the construction of new sewer and water lines to support the proposed buildings; the lines would be connected to main municipal sewer and water lines. Environmental impacts associated with excavation for installation of sewer and water line connections would not be unusual or cause a significant impact.

The reduced enrollment capacity at the school would not increase wastewater generation and water demand at the site; they would be similar to or less than existing conditions. Construction would generate waste; however, the amount generated would not be unusual, and the project would comply with federal and state laws that govern solid waste disposal.

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. The closest officially designated scenic highway is a segment of SR 91, approximately 3.25 miles north of the site (Caltrans 2011). Due to the distance and intervening structures, project implementation would not result in a visual impact to a scenic resource. This exception does not apply to the project.

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 Quality Control Board 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.

Three regulatory agency databases were searched on February 5, 2018—GeoTracker, maintained by the State Water Resources Control Board; EnviroStor, maintained by the Department of Toxic Substances Control; and EnviroMapper, maintained by the US Environmental Protection Agency. The project site is not listed on the Geotracker, Envirostor, or Enviromapper data management systems. Additionally, the Phase I ESA completed for

the project concluded that there are no recognized environmental conditions and the existing school campus is not on a current or former disposal site. Therefore, this exception does not apply to the project.

f. Historic 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. Historical resources are defined as buildings, structures, or objects that are more than 50 years old (CCR 4852 [d][2]). Orange High School was constructed between 1952 and 1953 and meets the minimum age requirement of 50 years to consider its historical significance. The Architectural History Inventory and Evaluation Report prepared for the project concludes that the project site is not listed on and is not eligible for listing on an official local register of historical resources, the California Register of Historical Resources, or the National Register of Historic Places. Project implementation would not result in a direct impact to a historical resource. This exception does not apply to the project.

6. Conclusion

The proposed project at Orange High School would not have a significant effect on the environment. The proposed improvements would not meet the conditions in Section 15300.2, Exceptions, of the CEQA Guidelines. Therefore, the project can be exempt from the provisions of CEQA.

7. References

Airport Land Use Commission (ALUC). 2013. John Wayne Airport, Orange County. ALUC. http http://www.ocair.com/commissions/aluc/.

CALFIRE. 2011, November. Local Responsibility Area. http://frap.fire.ca.gov/webdata/maps/orange/fhszl_map.30.pdf .

California Department of Conservation (CDC). Surface Mining and Reclamation Act. Special Report 143: Part III. ftp://ftp.consrv.ca.gov/pub/dmg/pubs/sr/SR_143/PartIII/Plate_3-19.pdf.

_____. 2004, February. Agricultural Preserves: Williamson Act Parcels, Orange County, California. ftp://ftp.consrv.ca.gov/pub/dlrp/wa/Orange_WA_03_04.pdf.

_____. 2014. California Important Farmland Finder. ftp://ftp.consrv.ca.gov/pub/dlrp/FMMP/pdf/2014/ora14.pdf.

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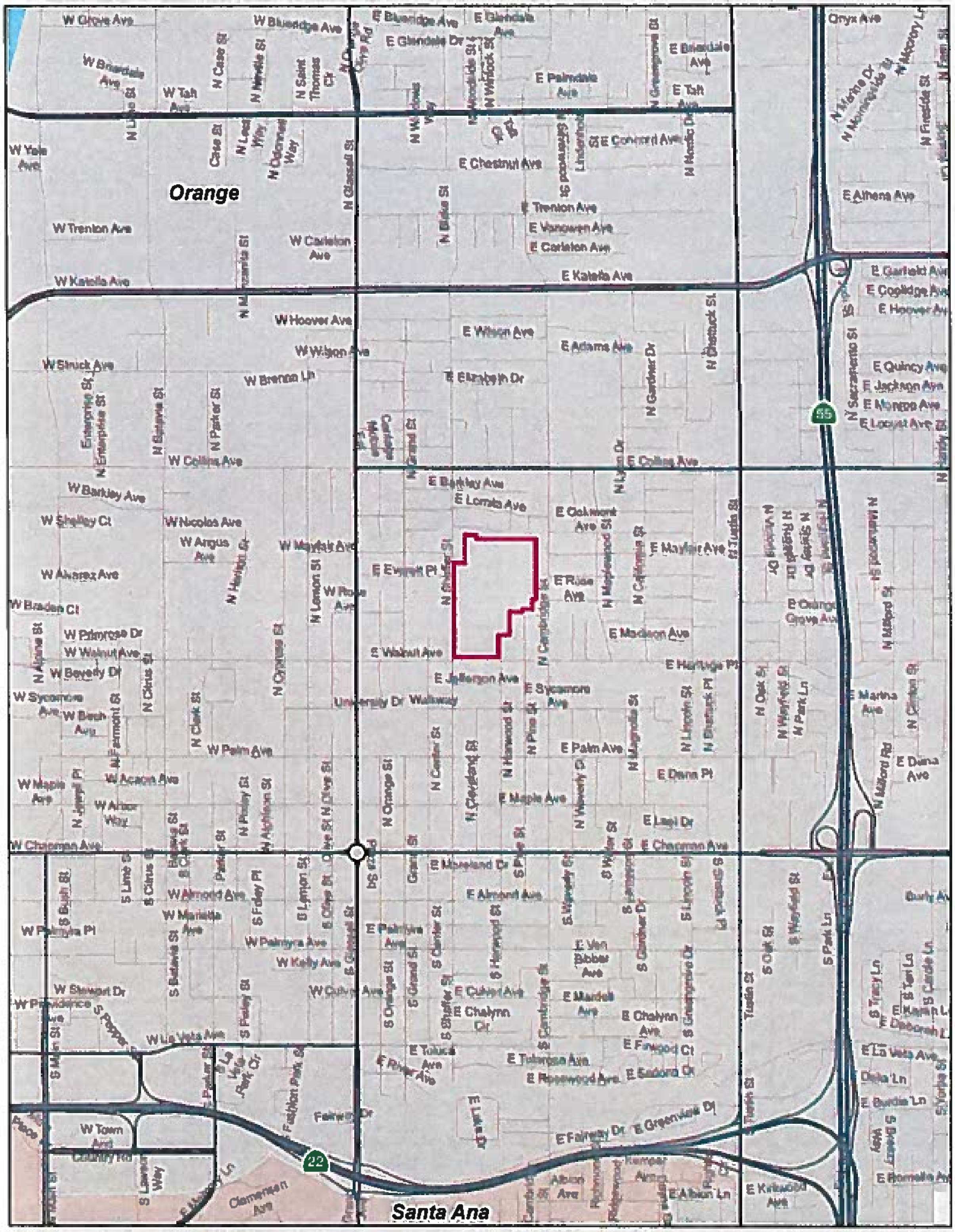
Figure 1 - Regional Location

Source: ESRI, 2017

Figure 2 - Local Vicinity



Orange High School

0 2,000
Scale (Feet)

Source: ESRI, 2017

Figure 3 - Aerial Photograph

Source: GoogleEarth, 2016

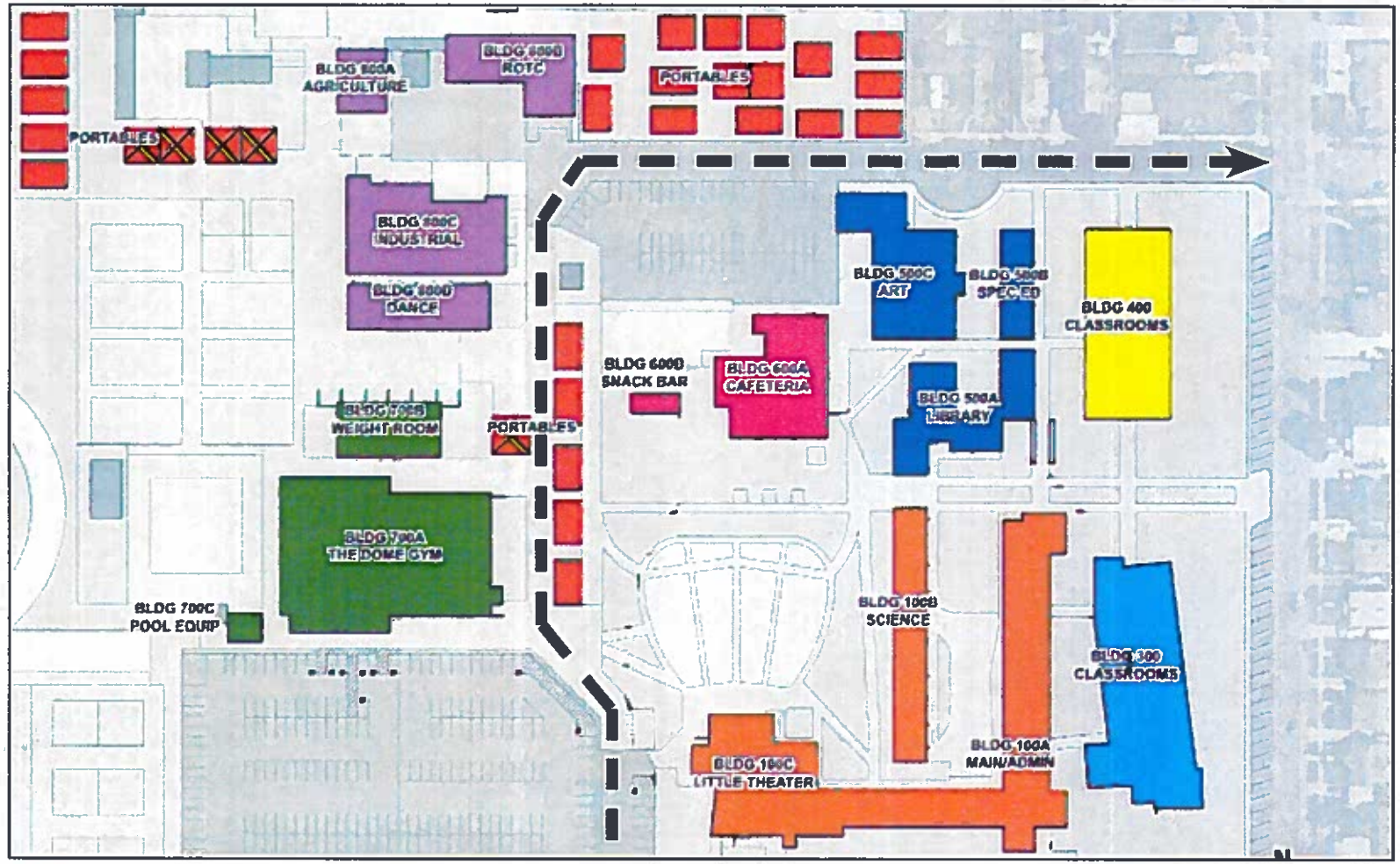
Figure 4 - Site Photographs

View of the proposed bus drop off area facing east. The driveway entrance would be constructed on the right side of the grass lawn and the egress driveway would be constructed on the left, near the truck.

View of the existing staff parking lot on the eastern portion of campus. The existing fencing would be removed and the proposed STEM building would be constructed above the parking lot area.

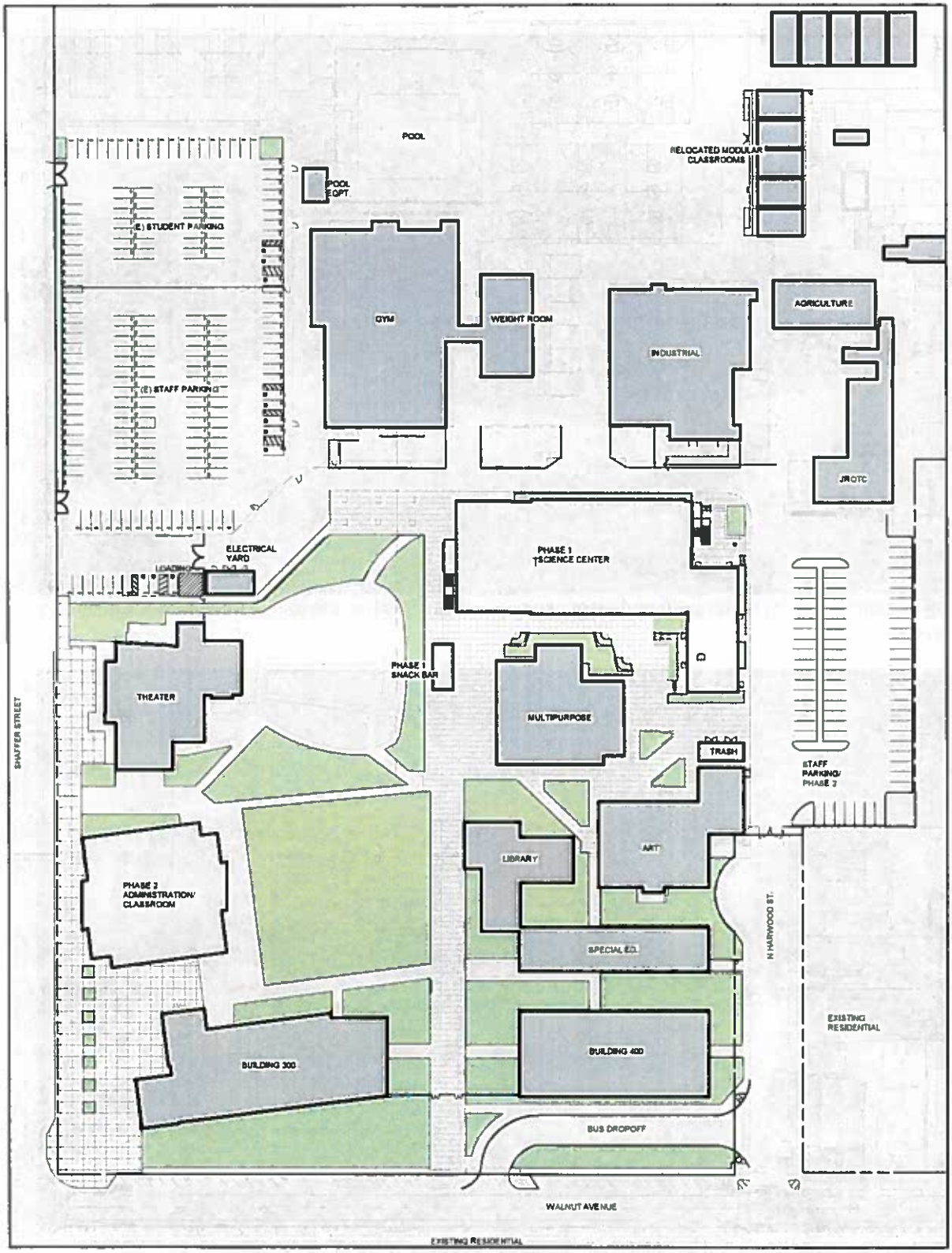
View looking east of the existing playcourts. Five portable classrooms would be moved to the area on the right, in the general location of the green fencing.

Figure 5 - Existing Facilities



Source: LIONAKIS, 2018

Figure 6 - Conceptual Master Plan



Source: LIONAKIS, January 12, 2018

Figure 7 - STEM Renderings

View looking west from the eastern portion of campus near the area where the 14 portables would be removed.

View looking east of the STEM building from the student parking lot entry on the western portion of campus.