



July 27, 2023

112-SBA-T43091

Mr. Art Scott
Program Manager
Caldwell Flores Winters, Inc.
521 N. 1st Avenue
Arcadia, California 91006

Subject: California Environmental Quality Act (CEQA) Categorical Exemption for the New Preschool, Transitional Kindergarten, and Kindergarten Classrooms at Tamarack Elementary School Project.

Dear Mr. Scott:

Please find as follows our findings that the proposed New Preschool, Transitional Kindergarten, and Kindergarten Classrooms at Tamarack Elementary School, located at the existing Tamarack Elementary School campus (at 1000 South Union Avenue, Avenal, California 93204), is exempt from further environmental review based on a Class 14 exemption under the California Environmental Quality Act (CEQA). In addition, attached is a completed Notice of Exemption form to be filed with the Kings County Clerk and Recorder's office.

Table 1 Project Summary

Project Title:	New Preschool, Transitional Kindergarten, and Kindergarten Classrooms at Tamarack Elementary School
Project Applicant (Public Agency Approving Project):	Reef-Sunset Unified School District
CEQA Exemption Recommendation:	Categorical Exemption
Location:	1000 South Union Avenue, Avenal, California, 93204
Assessor Parcel Number (APN):	040-280-012-000, 040-280-011-000, and 040-280-041-000
Site Size:	10 Acres
Site Access:	South Union Avenue, Hanford Avenue
General Plan Land Use Designation:	Public Facility
Zoning:	Public Facility (PF)
Current Use of Project Site:	Public Elementary School
Proposed Use of Project Site:	Public Elementary School
Surrounding Land Uses:	North: Residential (R1) South: Residential (R1)



	East: Residential (R1) West: Residential (R2, R3)
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Project Location and Environmental Setting:

The project Site is located at 1000 South Union Avenue, in Avenal, California (see Figure 1, Local Vicinity Map). The project site is currently used as a public elementary school. Tamarack Elementary School was initially opened in 2001 and consists of twenty (21) portable classrooms. Vehicular access to the school is provided from South Union Avenue and Hanford Avenue.

The approximately 10-acre site includes assessor parcel numbers (APNs) 040-280-012-000, 040-280-011-000, and 040-280-041-000.¹ The project site is surrounded on three sides by single family residential (R1) neighborhood. Directly west and southwest of the project are medium and high-density multi-family residential developments (R2, R3). The project site is located within the City of Avenal General Plan and has a General Plan Land Use Designation of Public Facilities, and Zoning designation of PF, Public Facilities.²

Project Description:

Under the California Preschool, Transitional Kindergarten and Full-Day Kindergarten Facilities Grant Program, the District received a State Allocation Board (SAB) grant apportionment of approximately \$9.0 million on November 28, 2022, for nine new permanent classrooms to be located at the Tamarack Elementary school site. The project includes three new preschool, three new transitional kindergarten, and three new kindergarten classrooms. The nine new classrooms are proposed to expand and complete existing preschool and kindergarten facilities at Tamarack Elementary School, pursuant to the adopted State and Board specifications for these facilities.

The classrooms are proposed to be housed in a total of five buildings with four of the buildings containing two classrooms each. Six of the existing classrooms would be transitioned to other uses besides TK/K-5th grade classrooms, including: Intervention, Music, STEM, and SDC Non-Severe Special Education (see Figure 2, Conceptual Site Plan). All buildings are proposed to be constructed south of the existing administration and parking area and north of the existing portable classroom wings. Two of the buildings will be located west of the existing “quad” area next to and as a part of the existing preschool facility which is anticipated to be demolished and replaced with three new preschool facilities and play area. Immediately east and south and within the existing “quad” area, the remaining three buildings, each containing two classrooms, are proposed to be constructed within the boundaries of the existing fire lane, bounded to the north with a new transitional kindergarten/ kindergarten playground to be constructed as part of the scope of work. Existing circulation, pathways, and landscaped areas will be redesigned to accommodate the proposed project and use.

¹ County of Kings Parcel & Services Map. Accessed June 2023, URL: <https://kingscomdev.maps.arcgis.com/apps/webappviewer/index.html?id=35c6e6dac50446b9945154c9fc7f46c8>

² City of Avenal. Online Map. Accessed June 2023, URL: <https://www.cityofavenal.com/DocumentCenter/View/731/Zoning-Map?bidId=>



The classrooms will be 1,350 square feet each including storage, prep areas, and kindergarten restrooms. The classrooms will be of modular construction and inclusive of specification of the previously approved kindergarten facilities approved by the Board which allows for their intended use and adaptability in the future, if needed, for preschool, transitional kindergarten, or kindergarten facilities. Upon completion, this project will bring the total number of new State Title 5 compliant classrooms for preschool/transitional kindergarten/kindergarten at the Site to nine (9) with at least three (3) also meeting the additional Title 22 preschool licensing standards.

CEQA Exemption Recommendation: Categorical Exemption, CEQA Guidelines Section 15314 – Existing Facilities:

CEQA Guidelines Section 15314, Minor Additions to Schools, defines a Class 14 Exemption as minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less.

Reasons to support exemption findings:

The Project consists of the construction of nine (9) permanent classrooms and associated site improvements including a kindergarten playground on the existing Tamarack Elementary School Campus. The proposed project would not increase student capacity by more than 25%, nor would it add more than ten (10) classrooms as identified in Table 2. Therefore, the proposed project would qualify for a Class 14 Exemption.

Table 2: Comparison of Existing and Proposed Tamarack ES Configuration

	Tamarack ES Existing Configuration	Tamarack ES Proposed Configuration	Percent Increase
Permanent Classrooms	0	9	N/A
Portable Classrooms	21	15	-28.6%
Special Education Classrooms	0	4	N/A
Total Classrooms	21	28	33.3%
Other Uses (Intervention, Music, Stem)	0	2	N/A
Student Capacity	525	623	18.7%
Permanent Square Footage	0	12,150	N/A
Portable Square Footage	21,180	21,180	0%
Total Building Square Footage	21,180	33,330	57.4%



Total Site Area (Acres)	10	10	0%
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Exceptions:

CEQA Guidelines Section 15300.2, Exceptions, details six exceptions to the exemptions. Each of the six exceptions are discussed below together with the reasons why they are not applicable to this project.

- 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 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.**

The New Preschool, Transitional Kindergarten, and Kindergarten Classrooms at Tamarack Elementary School would occur on the existing campus. The proposed project qualifies for a Class 14 exemption and therefore this criterion is not applicable to this project.

- 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.**

Cumulative impacts are defined in the State CEQA Guidelines Section 15355 as two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts. The cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time.

During the last 22 years (2001-2023), the campus has not added any permanent classrooms to the campus. The proposed project includes the construction and operation of nine (9) new permanent classrooms on the existing Tamarack Elementary School campus. With implementation of the proposed project, the nine new classrooms would be the only classrooms added to the school in the foreseeable future. There is no foreseeable need to increase student capacity or add additional classrooms beyond the proposed project. If there were to be a change that precipitated future development that would result in potential cumulative impacts, then potential cumulative impacts could be assessed at that time. Therefore, with implementation of the proposed project a total of nine classrooms would be added to the campus, which combined is less than the ten classrooms and less than the 25% capacity increase threshold allowed under a Class 14 Exemption. Therefore, no cumulative impacts are anticipated.

- 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.**

There is no evidence to indicate that the proposed project would have a significant effect on the environment due to unusual circumstances. The proposed project includes the construction and operation of nine (9) new permanent classrooms on the existing Tamarack Elementary School campus. The campus is located within a developed residential neighborhood and would continue to be used as a public school with implementation of the proposed project. Access to the Site is currently from South Union or Hanford Avenues, and no changes to site access are proposed. The proposed project would be implemented in compliance with all relevant regulations and District specifications, including construction best management practices. Therefore, no impacts due to unusual circumstances are anticipated.

- 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.**

The proposed project includes the construction and operation of nine (9) new permanent classrooms on the existing Tamarack Elementary School campus. There are no officially designated State Scenic Highways located within close proximity to the project site based on a review of the California State Scenic Highway System Map.³ Therefore, no adverse impacts to scenic resources within a designated state scenic highway would result.

- 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.**

Tetra Tech prepared a Phase I Environmental Site Assessment (ESA) to identify evidence or indications of 'recognized environmental conditions' (REC) as defined by the American Society for Testing and Materials (ASTM) *Designation E 1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*. Section 1.1.1 of ASTM *Designation E 1527-21* defines an REC as "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment."⁴

³ California Department of Transportation (Caltrans). California State Scenic Highway System Map. Accessed May 2023, URL: <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>

⁴ Tetra Tech. Phase I Environmental Site Assessment Report Tamarack Elementary School, Avenal, Kings County. June 2023.



The Phase I ESA revealed no evidence of RECs in connection with the Site, the surrounding school, or adjoining properties. No further environmental assessment of the Site appears to be warranted at this time.⁵ Therefore, no hazardous waste impacts are anticipated.

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.

Tamarack Elementary School is 22 years old. The campus was initially opened in 2001 and consists of twenty-one (21) portable classrooms on an approximately 10-acre lot. There is no demolition of any permanent structures constructed before 2001 planned as part of the proposed project. Therefore, no adverse impacts to known historic resources are anticipated.

The New Preschool, Transitional Kindergarten, and Kindergarten Classrooms at Tamarack Elementary School Project (“project”) described above is determined to be exempt from further environmental review requirements of CEQA of 1970, as defined in the State CEQA Guidelines for the implementation of CEQA.

Please contact Randy Westhaus at (805) 455-0603 (Randy.Westhaus@tetratech.com) or Seth Hopkins at (774) 991-5822 (Seth.Hopkins@tetratech.com) if you have any questions regarding this analysis or need additional information.

Sincerely,

TETRA TECH

A handwritten signature in black ink that reads 'Randy Westhaus'.

Randy Westhaus, P.E.
California Schools Director

A handwritten signature in blue ink that reads 'Seth I Hopkins'.

Seth Hopkins, M.A.
Senior Environmental Planner

Attachments: Figure 1 – Local Vicinity Map
Figure 2 – Conceptual Site Plan

⁵ Tetra Tech. Phase I Environmental Site Assessment Report Tamarack Elementary School, Avenal, Kings County. June 2023.



FIGURE 1 - LOCAL VICINITY MAP
TAMARACK ELEMENTARY SCHOOL
1000 SOUTH UNION AVENUE
AVENAL, CA 93204

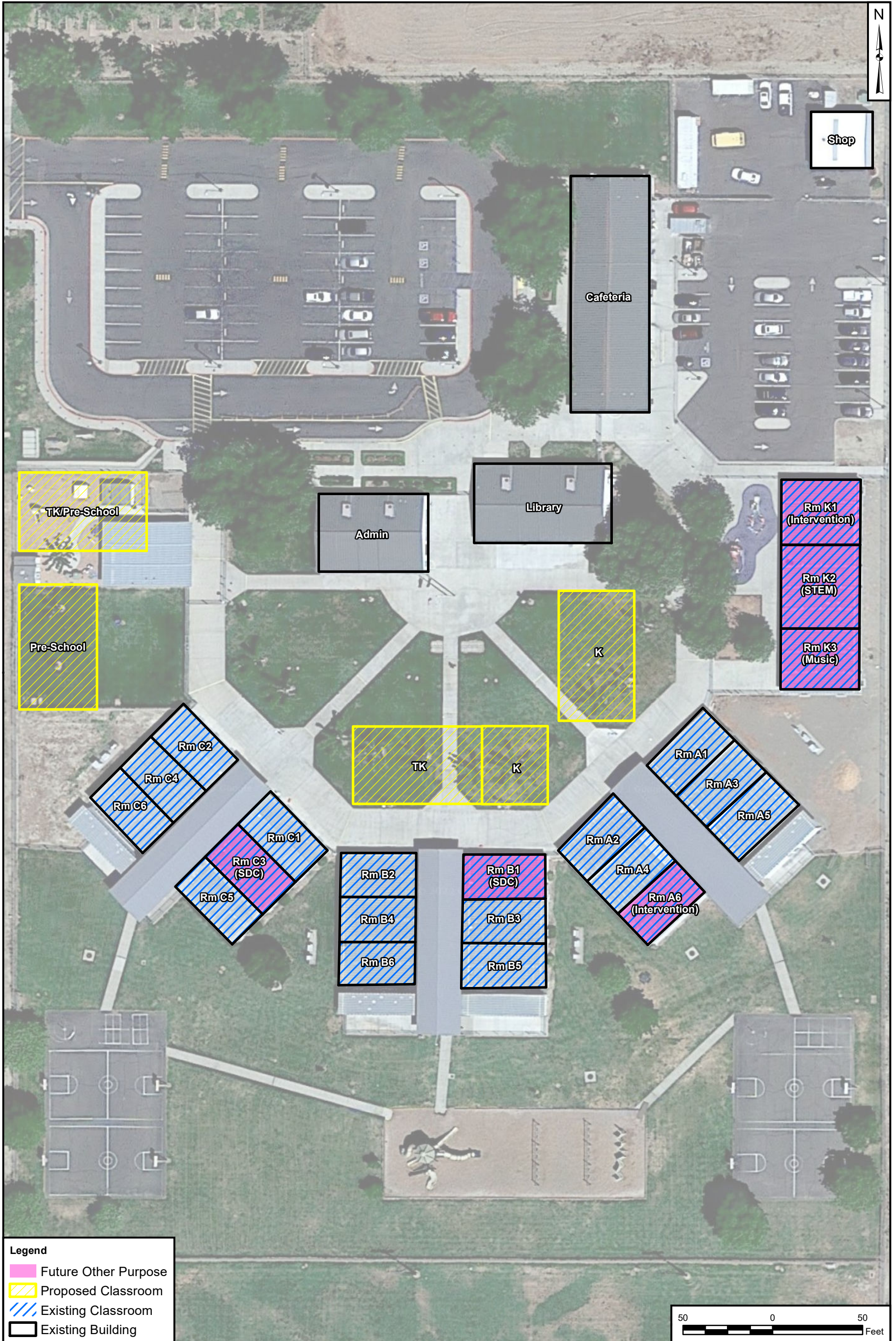


FIGURE 2 - CONCEPTUAL SITE PLAN
TAMARACK ELEMENTARY SCHOOL
1000 SOUTH UNION AVENUE
AVENAL, CA 93204

