



**SAN DIEGO COUNTY CLERK  
CEQA FILING COVER SHEET**

**FILED**  
Jan 28, 2025 02:43 PM  
JORDAN Z. MARKS  
SAN DIEGO COUNTY CLERK  
File # 2025-000048  
State Receipt # 37012820250039

THIS SPACE FOR CLERK'S USE ONLY

Complete and attach this form to each CEQA Notice filed with the County Clerk

TYPE OR PRINT CLEARLY

**Project Title**

**MONTGOMERY HIGH SCHOOL SYNTHETIC TURF REPLACEMENT AND TRACK  
REFURBISHMENT**

**Check Document being Filed:**

- ☐ Environmental Impact Report (EIR)
- ☐ Mitigated Negative Declaration (MND) or Negative Declaration (ND)
- ☒ Notice of Exemption (NOE)
- ☐ Other (Please fill in type):

**FILED IN THE OFFICE OF THE SAN DIEGO  
COUNTY CLERK ON** January 28, 2025  
**Posted** January 28, 2025 **Removed** \_\_\_\_\_  
**Returned to agency on** \_\_\_\_\_  
**DEPUTY** \_\_\_\_\_

Filing fees are due at the time a Notice of Determination/Exemption is filed with our office. For more information on filing fees and No Effect Determinations, please refer to California Code of Regulations, Title 14, section 753.5.

# Notice of Exemption

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

From: Sweetwater Union High School District  
1130 Fifth Avenue  
Chula Vista, CA 91911

San Diego County Clerk, Office of the Recorder  
1600 Pacific Highway, Suite 260  
San Diego, CA 92101

Montgomery High School Synthetic Turf Replacement and Track Refurbishment

**Project Title**

3250 Palm Avenue (Assessor's Parcel Number 7762921101)

**Project Location - Specific**

San Diego

**Project Location - City**

San Diego

**Project Location - County**

The District proposes modernization and updates to the existing synthetic track and field and dirt shot put area, minor accessibility upgrades to the restroom facilities, and restriping of the ADA parking spaces in two parking lots at Montgomery High School. The proposed improvements would be available for community use when not used by the school or District.

**Description of Nature, Purpose, and Beneficiaries of Project**

Sweetwater Union High School District

**Name of Public Agency Approving Project**

Sweetwater Union High School District

**Name of Person or Agency Carrying Out Project**

**Exempt Status:**

- ☒ **Categorical Exemption:** CEQA Guidelines Section 15301 (Class 1, Existing Facilities), Section 15302 (Class 2, Replacement or Reconstruction), Section 15304 (Class 4, Minor Alterations to Land), and Section 15314 (Class 14, Minor Additions to Schools)

The Class 1 exemption applies as the proposed improvement would repair and replace existing facilities at the campus and that would have the same capacity as the existing use. The Class 2 exemption applies as the proposed improvements would replace existing facilities at their current locations and have the same purpose and capacity as those existing. The Class 4 exemption applies as the Project would occur on graded land with a slope of less than 10 percent that is not within a waterway, wetlands, and/or areas of severe geologic hazards. Disturbed areas would be restored with new structures, pavement, and/or ground cover/landscaping. No trees would be removed for Project implementation. The Class 14 exemption applies as the proposed improvements would occur on an existing school and would not increase the number of classrooms or student capacity at the school. Additionally, none of the exceptions listed in CEQA Guidelines Section 15300.2 apply to the Project.

**Reasons why project is exempt**

Jason Brust, Director of Planning and Construction  
**Lead Agency Contact Person**

(619) 691- 5553

**Area Code/Telephone**

**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?

☐ No ☒ Yes

Signature:



Date:

1-28-25

Title:

Director of Planning & Construction

☒ Signed by Lead Agency

☐ Signed by Applicant

**SWEETWATER UNION HIGH SCHOOL DISTRICT**

**RESOLUTION NO. 4944**

**RESOLUTION AUTHORIZING A NOTICE OF )  
EXEMPTION FOR PURPOSES OF SATISFYING )  
THE CALIFORNIA ENVIRONMENTAL QUALITY )  
ACT (CEQA) FOR THE MONTGOMERY HIGH )  
SCHOOL STADIUM TURF REPLACEMENT & )  
TRACK REFURBISHMENT PROJECT, APPROVING )  
THE PROJECT, AND DELEGATING AUTHORITY )  
TO STAFF TO EXECUTE AND FILE THE NOTICE )  
OF EXEMPTION WITH THE SAN DIEGO COUNTY )  
CLERK AND STATE CLEARINGHOUSE )**

ON THE MOTION OF Member Emerald, seconded by Member Solis, the following resolution is adopted:

WHEREAS, the Sweetwater Union High School District (District) is a public school district organized and existing under the laws of the State of California; and

WHEREAS, the District is the lead agency under the California Environmental Quality Act (CEQA) for the Montgomery High School Stadium Turf Replacement and Track Refurbishment Project (Project); and

WHEREAS, the Project consists of modernization and updates to the existing synthetic track and field and dirt shot put area, minor accessibility upgrades to the restroom facilities, and restriping of the ADA parking spaces in two parking lots at Montgomery High School; and

WHEREAS, the Project is subject to the CEQA (Public Resources Code Section 21000 et seq.) and CEQA Guidelines (California Code of Regulations, Title 14 Section 15000 et seq.); and

WHEREAS, categorical exemptions to CEQA are set forth in Article 19 of the CEQA Guidelines; and

WHEREAS, the District hired a firm specializing in CEQA environmental compliance that undertook environmental analysis for the Project; and

WHEREAS, the environmental analysis documents that the Project is categorically exempt under Categorical Exemption Classes 1, 2, 4, and 14, CEQA Guidelines Sections: 15301 (Existing Facilities), 15302 (Replacement or Reconstruction), 15304 (Minor Alterations to Land), and 15314 (Minor Additions to Schools), and a Notice of Exemption

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January 27, 2025  
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and accompanying Attachment have been prepared; and

WHEREAS, CEQA Guidelines Section 15301 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use; and

WHEREAS, the Project consists of repairing and maintaining existing facilities at the school campus and does not propose new uses, or the expansion of existing uses; and, therefore, the Project meets the conditions of Class 1; and

WHEREAS, CEQA Guidelines Section 15302 consists of 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; and

WHEREAS, Project improvements would be made in the same location as the facilities replaced, no new structures or uses would be added, and the capacity of the improved facilities would not be expanded; and, therefore, the Project meets the conditions of Class 2; and

WHEREAS, CEQA Guidelines Section 15304 consists of activities with minor alterations in the condition of land with a slope of less than 10 percent and vegetation, which do not involve the removal of healthy, mature, scenic trees, including minor excavation, trenching, backfilling, and restoring the impacted area; and

WHEREAS, the Project site is relatively flat and all areas disturbed by the Project would be restored with synthetic turf, rubberized surfaces, sand/dirt, and/or newly striped pavement for continued school operations, and no scenic or mature trees would be removed from Project implementation; and, therefore, the Project meets the conditions of Class 4; and

WHEREAS, CEQA Guidelines Section 15314 consists of activities involving minor additions to existing schools within existing school grounds where the additions do not increase the original student capacity by more than 25 percent or ten classrooms, whichever is less; and

WHEREAS, the existing outdoor education areas are learning facilities, accessory to the existing high school, and the Project does not include any new classrooms or new outdoor learning spaces that would increase the school's seating capacity or operations; and school enrollment capacity would remain the same as under existing conditions; therefore, the Project meets the conditions of Class 14; and

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WHEREAS, the board has reviewed and considered the environmental analysis completed for the Project and determined that none of the exceptions to the categorical exemption, as set forth in CEQA Guidelines Section 15300.2, apply to the Project, including: (a) the Project Site is entirely developed with school facilities and not within a sensitive environment, (b) the Project will not create or contribute to a cumulatively considerable environmental impact, (c) no unusual circumstances are known to exist that could cause the Project to create a significant environmental effect, (d) the Project will not damage scenic resources along an officially designated State scenic highway, (e) the Project site is not on a hazardous waste list compiled pursuant to Government Code Section 65962.5, and (f) the Project will not cause a substantial adverse change in the significance of a historical resource; and

WHEREAS, the board has determined that the Notice of Exemption incorporated therein is adequate, complete, and has been prepared in accordance with CEQA; and

WHEREAS, the Notice of Exemption has been prepared in compliance with CEQA and reflects the District's independent judgment and analysis; and

WHEREAS, all other legal prerequisites to the adoption of this resolution have been met.

NOW, THEREFORE, BE IT RESOLVED:

- Section 1: The above recitals are true and correct.
- Section 2: The Notice of Exemption prepared for the Project has been completed in accordance with CEQA guidelines.
- Section 3: The Sweetwater Union High School District shall follow the requirements of the Migratory Bird Treaty Act (MBTA) by implementing the following standard practice prior to construction activities: If construction starts during nesting bird season, the District will perform a preconstruction nesting bird survey by a qualified biologist within three (3) days prior to the initiation of ground disturbance or vegetation removal activities associated with the Project.
- Section 4: The Notice of Exemption reflects the board's independent judgment and analysis.
- Section 5: The board hereby approves and adopts the Notice of Exemption for the project per the State CEQA guidelines.
-

Resolution No. 4944

January 27, 2025

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Section 6: The board hereby approves the Project.

Section 7: The board hereby delegates authority to staff to execute and file the Notice of Exemption with the County Clerk and the State Clearinghouse.

Section 8: The Notice of Exemption constitutes a record of these proceedings and will be kept at the offices of the Sweetwater Union High School District, located at 1130 Fifth Avenue, Chula Vista, CA 91911, under the control of the director of planning and construction.

PASSED AND ADOPTED by the Board of Trustees of the Sweetwater Union High School District, County of San Diego, State of California, this 27<sup>th</sup> day of January, 2025, by the following vote:

AYES: 4 (EMERALD, LOPEZ, LOPEZ-ZEPEDA, SOLIS)

NOES: 0

ABSTAIN: 0

ABSENT: 1 (ARANCIBIA)

\*\*\*\*\*

State of California                    )  
  ) SS  
County of San Diego                 )

I, Deanne Vicedo, Clerk of the Board of Trustees of the Sweetwater Union High School District, County of San Diego, State of California, do hereby certify that the foregoing is a true copy of a resolution adopted by said board at a regular meeting thereof, at the time and by the vote therein stated, which original resolution is on file in the office of said board.

  
\_\_\_\_\_  
Deanne Vicedo, Clerk

January 27, 2025  
Date

1/28/25, 11:31 AM

Print Item



**Regular Board Meeting**  
**01/27/2025 06:00 PM**  
Board Room, 1130 Fifth Avenue  
Chula Vista, CA

Printed : 1/28/2025 11:31 AM PT

**ITEM : O.1. Adopt Resolution No. 4944, Authorizing a Notice of Exemption for Purposes of Satisfying the California Environmental Quality Act (CEQA) for the Montgomery High School Stadium Turf Replacement & Track Refurbishment Project, Approving the Project, and Delegating Authority to Staff to Execute and File the Notice of Exemption with the San Diego County Clerk and State Clearinghouse.**

**Issue**

Resolution No. 4944.

**Recommendation**

Adopt Resolution No. 4944, Authorizing a Notice of Exemption for Purposes of Satisfying the California Environmental Quality Act (CEQA) for the Montgomery High School Stadium Turf Replacement & Track Refurbishment Project, Approving the Project, and Delegating Authority to Staff to Execute and File the Notice of Exemption with the San Diego County Clerk and State Clearinghouse.

**Analysis**

For the Montgomery High School (MOH) Stadium Turf Replacement and Track Refurbishment project, the district hired an environmental consulting firm to conduct a CEQA environmental review.

Based on the firm's analysis of the project, the project falls under development classes that have been determined not to have significant effect on the environment, and the project can be categorically exempt from the provisions of CEQA under CEQA Guidelines Sections: 15301 (Existing Facilities), 15302 (Replacement or Reconstruction), 15303 (New Construction or Conversion of Small Structures), and 15314 (Minor Additions to Schools).

For questions regarding this board item, please contact Janea Quirk at (619) 585-6060 or [janea.quirk@sweetwaterschools.org](mailto:janea.quirk@sweetwaterschools.org).

**Fiscal Impact**

None.

**Supporting Documents**

O-1 - Reso 4944 MOH Stadium Turf Replacement Track Refurbishment

O-1 - Reso 4944 MOH Stadium Turf Replacement Track Refurbishment - Michael Baker International - NOE

O-1 - Reso 4944 MOH Stadium Turf Replacement & Track Refurbishment - Michael Baker International - NOE Attachment

32. Formation & Approval of Consent Agenda - AUDIO CLIP - 01 27 25

## CATEGORICAL EXEMPTION EVALUATION REPORT

### Montgomery High School Synthetic Turf Replacement and Track Refurbishment

January 2025

This Categorical Exemption Evaluation Report documents the eligibility of the Sweetwater Union High School District's (District) proposed turf replacement and track refurbishment at Montgomery High School (Project) to be exempt from expanded environmental review, pursuant to the California Environmental Quality Act (CEQA) under California Public Resources Code Section 21084 and California Code of Regulations, Title 14 (CEQA Guidelines) Sections 15061(b)(2) and 15300 et seq.

#### 1. Location

The Project is proposed in the northeast portion of the Montgomery High School campus at 3250 Palm Avenue, in the City of San Diego, San Diego County, California (Project site). The school is north of Palm Avenue and west of Beyer Way. Regional access is provided by Interstate 5, approximately 1.2 miles west of the school, and Interstate 805, approximately 1.4 miles to the east. *Figure 1, Project Site and Regional Location*, shows the location of the school and approximate Project site.

#### 2. Existing Setting

##### a. Existing Uses

Montgomery High School offers a comprehensive high school program for students in grades nine through twelve. During the 2023-24 school year, the school enrolled 1,658 students.<sup>1</sup>

Montgomery High School is located on Assessor's Parcel Number 7762921101.<sup>2</sup> The parcel comprises approximately 45 acres. The parcel is terraced, with lower elevations in the eastern, southern, and western perimeters and higher elevations in the center and northern portions of the property. The elevation of the Project site (i.e., the general area of the football stadium) and school buildings is approximately 145 feet above mean sea level (amsl). The western portion of the parcel is approximately 130 feet amsl, and the eastern portion is approximately 120 feet amsl.<sup>3</sup>

Montgomery High School was built in 1971 and has been maintained over the years by the District. As shown in *Figure 1*, school buildings are in the southern portion of the campus. Grass fields are located in the northwest portion of the campus. The football stadium is in the northeast portion of the campus. Parking is along the southwestern corner and southern perimeter of the campus. *Figure 2, Site Photos*, shows the existing track and field.

The Project site is approximately five acres and consists of the existing synthetic track and field, a dirt shot-put area located northeast of the track and field, existing men's and women's restrooms at the

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<sup>1</sup> California Department of Education, DataQuest, 2023-24 Enrollment Data, accessed September 18, 2024, <https://dq.cde.ca.gov/dataquest/dq census/EnrGrdYears.aspx?cds=37684113738234&agglevel=school&year=2023-24>.

<sup>2</sup> San Diego Zoning and Parcel Information Portal, accessed September 18, 2024, <https://sandiego.maps.arcgis.com/apps/Instant/sidebar/index.html?appid=75f6a5d68aee481f8ff48240bcaa1239>.

<sup>3</sup> Google Earth, accessed September 18, 2024.

## Categorical Exemption Evaluation Report

### Montgomery High School Synthetic Turf Replacement and Track Refurbishment

concessions building located southwest of the track and field, and ADA accessible parking stalls in the southwestern and southern parking lots of the campus.

#### b. Surrounding Land Uses

Montgomery High School is in a developed, urbanized area. It is surrounded by residential uses to the west and Palm Avenue to the south, beyond which are residential uses. The Montgomery Adult School is east of the high school campus, along Beyer Way; the adult school is on the same parcel as the high school campus but has the address of 3240 Palm Avenue. Farther east are residential and commercial uses. Otay Valley Regional Park is north of the campus.

As shown in Figure 1, the Project site is immediately surrounded by stadium bleachers to the south and north; tennis courts and a courtyard are south of the home bleachers and concessions building, and the Otay Valley Regional Park is north of the visitor bleachers and dirt shot-put area. The varsity baseball field is east of the stadium, the school's gymnasium is southeast of the Project site, and Montgomery Adult School's parking lot is to the east. A vegetated slope is between the dirt shot-put area and the adult school parking lot. Vegetation on the slope extends onto the shot-put area.

#### c. Land Use and Zoning

The City of San Diego General Plan Land Use map designates the Project site as Institutional & Public and Semi-Public Facilities, which is for uses that offer public and semi-public services to the community, such as airports, military facilities, community colleges, university campuses, landfills, communication and utilities, transit centers, water sanitation plants, schools, libraries, police and fire facilities, cemeteries, post offices, hospitals, park-and-ride lots, government offices and civic centers.<sup>4</sup> The Project site is located in the City's Otay Mesa-Nestor Community Plan Area and is designated as a school in the Community Land Use Plan.<sup>5</sup> The Project site has a base zone designation of Agricultural Residential-1-1 (A-R-1-1), Agricultural Residential-1-2 (A-R-1-2), and Residential-Single-1-7 (R-S-1-7). K-12 educational facilities are allowed in all three zones with a conditional use permit.<sup>6,7</sup>

### 3. Project Description

#### a. Project Characteristics

The Project includes modernization and updates to the track, field, and shot-put area, and minor accessibility upgrades to the restroom facilities and parking lots at Montgomery High School.

Improvements to the track would include cleaning, repairing, and replacing the inside and outside edges of the rubberized track. The bottom layer of the synthetic track would be repaired to match the existing

<sup>4</sup> City of San Diego, General Plan, Land Use and Community Planning Element, accessed September 18, 2024, [https://www.sandiego.gov/sites/default/files/2024-08/general-plan\\_02\\_land-use\\_july-2024\\_updated.pdf](https://www.sandiego.gov/sites/default/files/2024-08/general-plan_02_land-use_july-2024_updated.pdf)

<sup>5</sup> City of San Diego, Otay Mesa-Nestor Community Plan and Local Coastal Program, accessed September 18, 2024, [https://www.sandiego.gov/sites/default/files/2024-04/omg-cp-cpa-bella-mar\\_final-2024.pdf](https://www.sandiego.gov/sites/default/files/2024-04/omg-cp-cpa-bella-mar_final-2024.pdf).

<sup>6</sup> City of San Diego Municipal Code, Sections 131.0322 and 131.0422, accessed September 18, 2024, <https://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art01Division03.pdf>, <https://docs.sandiego.gov/municode/MuniCodeChapter13/Ch13Art01Division04.pdf>.

<sup>7</sup> Although the Project would be a permitted use, pursuant to Government Code Section 53094 et seq., the District Board of Education may exempt the Project and campus from the City of San Diego's zoning ordinances and regulations, including, without limitation, the City's Code of Ordinances, General Plan, and related ordinances and regulations that otherwise would be applicable.

Categorical Exemption Evaluation Report  
Montgomery High School Synthetic Turf Replacement and Track Refurbishment

conditions of the adjacent areas. A new synthetic layer would be applied over the existing track, and the track would be restriped with markings for competition. The pole vault, long jump, and high jump areas would also be resurfaced. The long jump and triple jump areas would be improved by cleaning the rubberized surfacing and sand/pit landing area, replacing the long/triple jump take-off boards, and resurfacing the long jump landing areas. Supplemental sand would be added as needed. A new, portable shot-put cage would be constructed in the southeast end of the track. A chain link fence would be installed around the shot-put cage.

The existing synthetic turf field would be removed, and a new synthetic turf would be installed. The field would be marked for football, soccer, lacrosse, field hockey, and flag football. A mid-field logo and end zone letters would be incorporated to match the existing graphics. The existing goal posts would remain and be repainted, and a 10-foot removable ball control netting would be installed at the east and west field end zones. The existing permeable aggregate base would be removed, repaired, or regraded as needed. The field cooling system would be reinstalled, and new spray heads would be relocated to the edges of the track. New in-ground hand holes/utility boxes would be installed in the field for existing high and low voltage infrastructure. *Figure 3, Site Plan*, shows the proposed final track and field design.

The restroom facilities at the concessions building would be improved to ensure compliance with the Americans with Disabilities Act (ADA). Improvements include minor adjustments to the partitions in both the men's and women's restrooms and removing the paper towel dispensers. The chain-link gate in front of the concession building would be modified to accommodate fire truck access.

The dirt shot-put area to the northeast of the track would be improved; a layer of decomposed granite would be added to even out the area; safety fencing would be installed around the existing shot-put pad; and an ADA accessible path would be provided to the shot-put event area.

The existing handicapped accessible parking stalls in the southwest and southern parking lots would have a slurry seal coating applied and would be repainted. The parking configuration and number of stalls would remain the same as existing conditions.

All improvements would be designed and constructed to comply with the 2022 Title 24 California Building Standards Code, which includes the Building Code (Part 2), Energy Code (Part 6), and Green Building Code (Part 11), as well as with the ADA and District design and construction standards.

The Project does not include any modifications to existing spectator seating (bleachers), changes to existing nighttime lighting, or perimeter landscape or irrigation improvements.

b. Operation

The Project would not change existing school programming or events at Montgomery High School. During construction, all field practices would be temporarily moved to the natural turf fields located on the northwest side of campus. Potential games and tournaments that are typically held at the Project site would be played offsite.

The proposed improvements would be available for community use in accordance with the Civic Center Act, similar to existing conditions and other facilities at the campus.<sup>8</sup>

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<sup>8</sup> Education Code Section 38134, et seq.

Categorical Exemption Evaluation Report  
Montgomery High School Synthetic Turf Replacement and Track Refurbishment

c. Construction

Construction would begin in June 2025, following Montgomery High School's graduation ceremony, and last approximately three months. The majority of construction would be conducted during the summer months when school is not in session. The proposed improvements would be available for use starting in September 2025.

Construction staging would occur either on the track and field or the area between the home bleachers and tennis courts. The construction and staging areas would be fenced with screening to limit trespassing and vandalism. Existing storm drain inlets surrounding the construction and staging areas would be protected.

d. Best Management Practices and Regulatory Compliance

The Project will implement the following construction best management practices (BMPs) and regulations:

- **Construction Noise.** The District will adhere to the City of San Diego's construction work hours provided in the City Municipal Code. Per Section 59.5.0404, construction can be conducted from Monday to Saturday, between 7:00 a.m. and 7:00 p.m. Construction would not occur on Sundays or federal holidays.<sup>9</sup>
- **Migratory Bird Treaty Act.** To avoid potential direct and/or indirect impacts to active bird nests, the District will comply with the federal Migratory Bird Treaty Act (MBTA) and California Fish and Game Code (CFG) and conduct preconstruction clearance surveys, prior to ground disturbance, as follows:

**MBTA/CFG Preconstruction Clearance Surveys** – If construction commences during the bird breeding season (February 15–September 15), a qualified biologist must be retained to conduct a nesting bird survey. To ensure there are no impacts to nesting birds, a general nesting bird survey shall be conducted prior to initial ground disturbance or site staging. The nesting bird survey should be conducted by a qualified biologist no more than three days prior to construction activities. If nests are found, an avoidance buffer should be established (100 feet for passerines and 300 feet for raptors) until the biologist has determined that the young have fledged and the nest is no longer active.

- **Clean Water Act.** The National Pollutant Discharge Elimination System Program is a federal program which has been delegated to the State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards. As the construction area is greater than 1 acre, the District would be required to comply with the SWRCB's Construction General Permit (Order No. 2022-0057-DWQ). This permit requires the District and its construction contractor to prepare a Storm Water Pollution Prevention Plan (SWPPP), which would identify BMPs to be implemented during all construction activities to control and reduce pollutants from discharging into downstream waterways. The BMPs may include those from the California Stormwater Quality Association Construction BMP Handbook and would address erosion control, perimeter control, wind erosion control, storm drain inlet protection, tracking control, and general site management. The BMPs may include silt fencing, installation of gravel bag barriers, protection of catch basin inlets, and stabilization of the construction

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<sup>9</sup> City of San Diego, Municipal Code Section 59.50404, accessed September 18, 2024, <https://www.sandiego.gov/sites/default/files/legacy/ced/pdf/muni5950404hours.pdf>.

**Categorical Exemption Evaluation Report**  
**Montgomery High School Synthetic Turf Replacement and Track Refurbishment**

entrance/exit point. Adherence to the SWPPP would reduce potential effects of Project construction on water quality to acceptable standards.

- **Clean Air Act.** Under federal and state law, the California Air Resources Board oversees the compliance of the federal Clean Air Act through State Implementation Plans. Local districts, including the San Diego Air Pollution Control District, enforce air pollution regulations. These regulations are primarily meant to ensure that the surrounding (or ambient) air meets federal and state air quality standards which would also reduce potential impacts to water quality.<sup>10</sup>

**Rule 50 (Visible Emissions):** Establishes limits to the opacity of emissions within the San Diego Air Pollution Control District.

**Rule 51 (Nuisance):** Prohibits emissions that 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.

**Rule 52 (Particulate Matter):** Establishes limits to the discharge of any particulate matter from nonstationary sources.

**Rule 54 (Dust and Fumes):** Establishes limits to the amount of dust or fumes discharged into the atmosphere in any single hour.

**Rule 55 (Fugitive Dust Control):** Limits generating fugitive dust emissions:

(1) **Airborne Dust Beyond the Property Line:** No person shall engage in construction or demolition activity subject to this rule in a manner that discharges visible dust emissions into the atmosphere beyond the property line for a period or periods aggregating more than 3 minutes in any 60-minute period.

(2) **Track-Out/Carry-Out:** Visible roadway dust as a result of active operations, spillage from transport trucks, erosion, or track-out/carry-out shall:

(i) be minimized by the use of any of the following or equally effective trackout/carry-out and erosion control measures that apply to the project or operation: track-out grates or gravel beds at each egress point, wheel-washing at each egress during muddy conditions, soil binders, chemical soil stabilizers, geotextiles, mulching, or seeding; and for outbound transport trucks: using secured tarps or cargo covering, watering, or treating of transported material; and

(ii) be removed at the conclusion of each workday when active operations cease, or every 24 hours for continuous operations. If a street sweeper is used to remove any track-out/carry-out, only PM10-efficient street sweepers certified to meet the most current South Coast Air Quality Management District Rule 1186 requirements shall be used. The use of blowers for removal of track-out/carry-out is prohibited under any circumstances.

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<sup>10</sup> San Diego Air Pollution Control District, "Rules & Regulations," accessed September 18, 2024, <https://www.sdapcd.org/content/sdapcd/rules.html>.

Categorical Exemption Evaluation Report  
Montgomery High School Synthetic Turf Replacement and Track Refurbishment

**Rule 67.0.1 (Architectural Coatings):** Requires manufacturers, distributors, and end users of architectural and industrial maintenance coatings to reduce volatile organic compound (VOC) emissions from the use of these coatings, primarily by placing limits on the VOC content of various coating categories.

#### 4. Applicability of Categorical Exemption

The CEQA Guidelines include 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. The Project qualifies for a categorical exemption under Classes 1, 2, 4, and 14, as further discussed below.

##### Class 1, Existing Facilities

Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. Examples include interior and exterior alterations, such as interior partitions, plumbing, and electrical conveyances; restoration or rehabilitation of deteriorated or damaged structures, facilities, and mechanical equipment to meet current standards; and maintenance of existing landscaping, native. (CEQA Guidelines Section 15301)

The Project consists of repairing and maintaining the existing outdoor track, field, dirt shot-put area, and concessions building restrooms, including water and stormwater lines, hardware, and fixtures, and restriping existing ADA parking spaces at Montgomery High School. The Project would affect existing facilities at the school campus. No new uses, or expansion of existing uses are proposed. The Project meets the requirements of Class 1.

##### Class 2, Replacement or Reconstruction

Class 2 consists of 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. (CEQA Guidelines Section 15302)

The Project consists of the replacement and repair of existing outdoor sporting facilities and indoor restroom facilities and repaving and restriping ADA facilities at Montgomery High School. The improvements would be made in the same location as the facilities replaced. No new structures or uses would be added, and the capacity of the improved facilities would not be expanded. The Project meets the requirements of Class 2.

##### 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. Examples include but are not limited to grading on land with a slope of less than 10 percent, except that grading shall not be exempt in a waterway, in any wetland, in an officially designated scenic area, or in officially mapped areas of severe geologic hazard such as an Alquist-Priolo Earthquake Fault Zone or within an official Seismic Hazard Zone, as delineated by the State Geologist, as well as minor trenching and backfilling where the surface is restored. (CEQA Guidelines Sections 15304 [a] and [f])

The Project would involve minor alterations of components of a public high school. The proposed improvements would disturb the existing synthetic track and field and dirt shot-put area, a restroom

## Categorical Exemption Evaluation Report

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facility, and parking area, which are flat with slopes of less than 10 percent. There are no waterways, wetlands, scenic areas, or mapped areas of geologic hazards.<sup>11</sup> There is no vegetation or trees on the Project site. All areas disturbed by the Project would be restored with synthetic turf, rubberized surfaces, sand/dirt, and/or newly striped pavement for continued school operations and to minimize erosion. The Project meets the requirements of Class 4.

#### 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 consists of improvements to the existing outdoor track, field, and dirt shot-put area at Montgomery High School. No new classrooms or outdoor learning spaces are proposed that would increase seating capacity, and no additional school-sponsored programming is proposed that would increase athlete participation or spectator attendance beyond existing conditions. Therefore, the school enrollment capacity would remain the same as under existing conditions. The Project meets the requirements of Class 14.

## 5. Exceptions to Categorical Exemptions

CEQA Guidelines Section 15300.2, Exceptions, lists conditions under which categorical exemptions are inapplicable. The discussion below addresses whether these conditions apply.

### 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 a project is located in a uniquely sensitive environment of hazardous or critical concern that has been designated, precisely mapped, or officially adopted pursuant to federal, state, or local laws. According to *Berkeley Hills Watershed Coalition v. City of Berkeley*, (2019) 31 Cal.App.5th 880, this exception concerns effects of the project on the environment, not the impact of the existing surrounding environmental conditions on the project or its future users.

The Project site is in an urbanized area and fully developed with existing school facilities. Neither the Project site nor campus is designated or mapped in a uniquely sensitive environment of hazardous or critical concern. Project implementation would be within developed areas of the existing school at the location of the facility proposed for repair and replacement. Therefore, the Project would not impact any sensitive or protected resources. This exception does not apply to the Project.

### b. Cumulative Impact

Section 15300.2(b) of the CEQA Guidelines states that exemptions are inapplicable when there is a significant cumulative impact of "successive projects of the same type in the same place, over time."

The District does not currently have projects ongoing at Montgomery High School or planned projects that would be implemented during Project construction. The District's 2024 Long Range Facilities Master Plan

<sup>11</sup> SANDAG Parcel Lookup Tool and Geographic Boundary Viewer, accessed October 10, 2024, <https://sdgls.sandag.org>; California Geological Survey Earthquake Hazards ones Application, accessed October 10, 2024, <https://maps.conservation.ca.gov/cgs/EQZApp/app>; US Fish and Wildlife National Wetlands Inventory Mapper, accessed October 11, 2024, <https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper>.

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identifies facility needs over the course of five years, through 2029, at District schools.<sup>12</sup> At Montgomery High School, anticipated improvements are categorized as Security and Safety, Site Improvements, Modernization, Removal of Portable Buildings, and New Construction. The proposed Project improvements would be the "Field Refurbishment" work under the Site Improvements category of the Facilities Master Plan. The District has no plans for implementation of any of the other projects identified for Montgomery High School in the 2024 Facilities Master Plan at this time. Additionally, the District would be required to implement similar construction BMPs and state and local regulations as those in Section 3.d, above. Therefore, any potential overlap of the Project's construction activities with other projects at Montgomery High School would not cause cumulatively considerable environmental effects. CEQA Guidelines Section 15300.2(b) does not apply to the Project.

c. Significant Effects

Section 15300.2(c) of the CEQA Guidelines states that 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 of 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 considers the second prong of this test 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 does not present unusual circumstances or special environmental constraints. The Project is minor in scope; it involves the replacement of existing facilities and would not change the existing uses and operations of the facilities. The Project site has operated as a track and field since Montgomery High School opened in 1971. The proposed improvements would occur in the same location as the existing facilities proposed for repair and replacement. Project implementation would comply with all applicable California laws and regulations related to public school construction. Construction methods would be typical for public schools in the state. The Project will comply with the current California Building Code and the ADA and would be plan-checked by the Division of the State Architect. The Project would implement construction BMPs, as listed in Section 3.d, to reduce potential impacts to biological resources, water quality, air quality, and community noise. Therefore, this exception does not apply to the Project.

d. Scenic Highways

Section 15300.2(d) of the CEQA Guidelines states that a categorical exemption cannot 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 officially designated state scenic highway is California State Route 75, which runs north-south from Coronado to Imperial Beach, approximately 3.4 miles west of Montgomery High School.<sup>13</sup> Due to the distance between the Project site and State Route 75, the Project would not result in damage to scenic resources, including but not limited to trees, historic buildings, rock outcroppings, or similar resources,

<sup>12</sup> Sweetwater Union High School District 2024 Facilities Master Plan, accessed October 17, 2024. <https://planningandconstruction.sweetwaterschools.org/facilities-master-plan/>

<sup>13</sup> Caltrans, California State Scenic Highway System Map, 2024, accessed September 24, 2024, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>

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within a highway officially designated as a state scenic highway. This exception does not apply to the Project.

**e. Hazardous Waste Sites**

Section 15300.2(e) 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, which requires the Secretary of the California Environmental Protection Agency to compile lists of hazardous materials sites and waste facilities, also known as the "Cortese List," including from the Department of Toxic Substances Control (DTSC) and SWRCB.

A computer search of the data resources that provide information regarding facilities or sites identified as meeting the Cortese List requirements, including from the DTSC and SWRCB,<sup>14</sup> determined that the Project site is not listed on any of the databases compiled pursuant to Section 65962.5. Therefore, Project implementation would not expose hazardous waste to people or the environment, and this exception does not apply to the Project.

**f. Historical Resources**

Section 15300.2(f) of the CEQA Guidelines states that 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 historical 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.

The Project site is on a high school campus that was developed in 1971. Neither the Project site nor school is listed on the National Register of Historic Places, California Register of Historical Resources, California Historical Landmarks, or California Office of Historic Preservation's Built Environment Resources Directory.<sup>15</sup> Additionally, the Project site is not located in a City of San Diego Historical District or identified as a registered historic landmark on the City of San Diego's Historical Resources Inventory Database.<sup>16</sup> There are no known historical resources on the campus, and Project implementation would not result in an adverse change to the significance of a historical resource. Thus, this exception does not apply to the Project.

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<sup>14</sup> Department of Toxic Substances Control, EnviroStor, Hazardous Waste and Substances Site List (Cortese), accessed October 10, 2024,  
[https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site\\_type=CSITES,FUDS&status=ACT,BKLG.COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29](https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG.COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29);

California State Water Resources Control Board, GeoTracker, accessed October 10, 2024,  
<https://geotracker.waterboards.ca.gov/map/?myaddress=California&from=header&cqlid=2956220328>

<sup>15</sup> National Park Services, National Register of Historic Places, accessed September 24, 2024,  
<https://www.nps.gov/subjects/nationalregister/database-research.htm#table>;

Office of Historic Preservation, California Historical Resources, accessed September 24, 2024,  
<https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=19>;

Office of Historic Preservation, California Historical Landmarks, accessed September 24, 2024,  
[https://ohp.parks.ca.gov/?page\\_id=21387](https://ohp.parks.ca.gov/?page_id=21387);

Office of Historic Preservation, Built Environment Resources Directory, accessed September 24, 2024,  
[https://ohp.parks.ca.gov/?page\\_id=30338](https://ohp.parks.ca.gov/?page_id=30338).

<sup>16</sup> City of San Diego Historical Resources Inventory Database, accessed October 10, 2024,  
<https://sandiego.cfwebtools.com/index.cfm>

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**6. Conclusion**

As documented herein, the Project meets the requirements of Categorical Exemption Class 1, *Existing Facilities*, 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. Therefore, the Project is exempt from extended environmental review in accordance with the provisions of CEQA.

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View of existing turf field, from the southeast corner facing northwest.

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View of existing track and turf field, from the northeast corner facing southwest.

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