

Fullerton Joint Union High School District

TROY HIGH SCHOOL SEISMIC AND FIELD IMPROVEMENTS PROJECT

February 2026 | Initial Study / Mitigated Negative Declaration



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For Fullerton Joint Union High School District

Fullerton Joint Union High School District

Vince Madsen, Senior Director of Facilities, M&O and Transportation
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ENVIRONMENTAL CHECKLIST

PROJECT INFORMATION

Project Title: Troy High School Seismic and Field Improvements Project

Lead Agency Name and Address:

Fullerton Joint Union High School District
1027 South Leslie Street
La Habra, CA 90631

Contact Person and Phone Number:

Vince Madsen, Senior Director of Facilities, M&O and Transportation
714.680.5601

Project Location: Troy High School is located at 2200 Dorothy Lane (Assessor Parcel Number [APN 283-291-02]) in the eastern portion of the City of Fullerton, California.

Project Sponsor's Name and Address:

Fullerton Joint Union High School District
1027 South Leslie Street
La Habra, CA 90631

General Plan Designation: School (SCH).

Zoning: Public Land (P-L).

Description of Project:

The proposed project includes three primary components: (1) seismic retrofitting and modernization; (2) interim portable classrooms during seismic retrofitting construction and modernization; and (3) athletic field improvements.

The District proposes to seismically retrofit and modernize classroom buildings 300 and 500 and a portion of classroom buildings 200 and 400 and the administration building. Seismic retrofitting would involve strengthening the existing buildings to make them more resistant to earthquake damage. As part of the seismically retrofitting process, the proposed project would include the existing roof-slabs being tied into the columns of the buildings for greater support. The process includes anchoring the building and associated structures to its foundation;

ENVIRONMENTAL CHECKLIST

reinforcing walls, columns, and beams; adding shear walls or steel bracing to resist lateral forces; and stabilizing soft or weak stories (such as open ground floors). It may also include securing non-structural elements—like ceilings, equipment, and facades—to prevent falling hazards during an earthquake.

As part of the retrofitting and modernization process, the proposed project would demolish interior and exterior finishings which would include flooring, roofing, walls, doors, windows, cabinets, sinks, water fountains, planters, skylights, and other non-structural building components. The demolition phase of the proposed project would also remove and cap all utilities as appropriate. The finishings would be replaced during the modernization process.

Modernization improvements for all buildings would include upgrades to both interior and exterior finishes, such as new flooring, roofing, concrete shear walls, plaster, paint, doors, windows, and cabinetry. For the administration building, specifically, the proposed project would also include a new internal layout to accommodate a student union area, restrooms, storage, a staff workroom, a student store, hallways, and custodial, electrical, and mechanical rooms, as well as other administration areas. The proposed project would also replace skylights in the administration building and in classroom buildings 300, 400, and 500.

During the seismic retrofitting and modernization phase of the proposed project, the District would temporarily relocate students from classroom buildings 200 through 500 to interim portable classrooms on the Troy High School (TRHS) Campus. The interim classrooms would consist of portable classrooms that would range in size from 919 square feet to 1,865 square feet and portable restrooms would also be installed. The portable classrooms and restroom buildings would include lighting installed on the outside of the buildings for security and safety and would be Americans with Disabilities Act (ADA) accessible. The interim portable classrooms would be installed in four clusters that would total 34 portable classrooms and two portable restrooms. Clusters 1 and 2 would consist of 14 portable classrooms located in the central part of the campus where the existing blacktop basketball courts are located. Clusters 3 and 4 would consist of 20 portable classrooms and two portable restroom buildings at the southwestern parking lot. As seismic retrofitting and modernization are complete at each classroom building, students would be relocated back into their respective classroom building. The portable classrooms and restroom buildings would be removed from the campus, and the parking lot and basketball courts would be returned to existing conditions.

The District proposes to install field lights (light fixtures and poles) at the baseball and softball fields and bleachers and field lighting with a public address (PA) system at the track and field. A total of 19 light fixtures would be installed around the baseball and softball fields, and track and field. The addition of field lights for the proposed project would allow for the extension of evening practices within the hours of 3:30 PM to 8:00 PM for 7 sports/activities. No new events, games, or increases in participants or spectators are proposed; major spectator events, such as

Friday night football, would continue to occur at Buena Park, Fullerton Union, and La Habra High Schools. Additionally, the proposed project would construct a 2,405 square-foot restroom and storage building west of the track and field, which would include a boys, girls, and staff restrooms; sports storage rooms; and an electrical room and custodian room.

Construction of the seismic retrofitting and modernization part of the proposed project is anticipated to occur in three phases and is anticipated to start in April 2026 and end in August 2028. Construction of the track and field part of the proposed project would occur in one phase and is anticipated to occur from April 2026 to September 2026. Construction would comply with the City's noise regulations, which allow such activities between 7:00 AM and 8:00 PM, except on Sundays and City-recognized holidays.

Surrounding Land Uses and Setting:

TRHS is surrounded by residential uses, parks, and religious institutions to the north; residential uses to the west; residential, educational, and commercial uses to the south; and educational and residential uses to the east. The closest sensitive receptors to the project site are single-family residences bordering the project site to the south and to the west adjacent to the campus.

Other Public Agencies Whose Approval Is Required (e.g., Permits, Financing Approval, or Participating Agreement):

- **Santa Ana Regional Water Quality Control Board (Region 8):**
 - Coverage under the National Pollutant Discharge Elimination System (NPDES) Construction General Permit for stormwater discharges associated with construction activities.
 - Compliance with the Municipal Separate Storm Sewer System (MS4) Permit, as applicable through the City of Fullerton's stormwater program.
- **South Coast Air Quality Management District (South Coast AQMD):**
 - Jurisdictional oversight of air quality emissions generated during construction and enforcement of applicable air quality rules and regulations.
- **California Department of General Services, Division of the State Architect (DSA):**
 - Review and approval of school building plans for structural safety, fire/life safety, and accessibility compliance in accordance with Title 24 of the California Code of Regulations.
- **California Department of Education (CDE), School Facilities Planning Division:**
 - Review of school site layout and verification of compliance with educational facility design standards and siting criteria.
- **Local Utility Providers (Southern California Edison, telecommunications, and water/sewer service):**
 - Issuance of connection permits and coordination of service for electrical, natural gas, water, wastewater, and communication utilities.

ENVIRONMENTAL CHECKLIST

Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code Section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

The proposed project would comply with tribal consultation requirements pursuant to Assembly Bill 52 (AB 52). The FJUHSD invited California Native American tribes that are traditionally and culturally affiliated with the project area to consult on the proposed project pursuant to Assembly Bill 52 (AB 52).

Fifteen tribes were invited to consult based on the District's AB 52 list—Agua Caliente Band of Cahuilla Indians, Gabrieleno Band of Mission Indians - Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino /Tongva Nation, Gabrielino-Tongva Tribe, Juaneno Band of Mission Indians Acjachemen Nation – Belardes, Juaneno Band of Mission Indians, La Jolla Band of Luiseno Indians, Pala Band of Mission Indians, Pauma Band of Luiseno Indians, Pechanga Band of Luiseno Indians, Pechanga Band of Mission Indians, Rincon Band of Luiseno Indians, San Fernando Band of Mission Indians, San Luis Rey Band of Mission Indians, and Soboba Band of Luiseno. The invitation letters were sent to tribes on December 11, 2025, via mail to the available addresses. No tribes requested to consult with the District regarding the proposed project. Tribal consultation pursuant to AB 52 concluded on January 11, 2026 for the proposed project

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project; that is, at least one impact is a “Potentially Significant Impact,” as indicated by the checklist for that factor in Chapter 3, *Environmental Evaluation*.

- | | | |
|--|---|---|
| ☐ Aesthetics | ☐ Agriculture / Forestry Resources | ☐ Air Quality |
| ☐ Biological Resources | ☐ Cultural Resources | ☐ Energy |
| ☐ Geology / Soils | ☐ Greenhouse Gas Emissions | ☐ Hazards and Hazardous Materials |
| ☐ Hydrology / Water Quality | ☐ Land Use / Planning | ☐ Mineral Resources |
| ☐ Noise | ☐ Population / Housing | ☐ Public Services |
| ☐ Recreation | ☐ Transportation | ☐ Tribal Cultural Resources |
| ☐ Utilities / Service Systems | ☐ Wildfire | ☐ Mandatory Findings of Significance |

ENVIRONMENTAL CHECKLIST

DETERMINATION

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Vince Madsen

Date

FEB 9, 2026

Senior Dir. Facilities, MOT

1. INTRODUCTION

1.1 OVERVIEW

The Fullerton Joint Union School District (District or FJUHSD) proposes to seismically retrofit and modernize some existing campus buildings on the Troy High School campus and provide interim portable classrooms to serve as interim housing during construction on the campus. In addition, the proposed project would install field lighting at the baseball and softball fields and bleachers and field lighting with a PA system at the track and field and would also include other track and field improvements. The proposed project would include landscaping and installation of fencing and gates. The proposed project would also include construction of a 20-foot-wide fire access lane that would provide emergency access.

In compliance with the California Environmental Quality Act (CEQA), the District, as lead agency, is preparing the environmental documentation for the proposed project to determine if implementation and associated discretionary actions would have a significant impact on the environment. As defined by Section 15063 of the CEQA Guidelines, an initial study (IS) is prepared primarily to provide the lead agency with information to use as the basis for determining whether an environmental impact report (EIR), negative declaration, or mitigated negative declaration (MND) would provide the necessary environmental documentation and clearance for the proposed project. This IS has been prepared to support the adoption of an MND.

1.2 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The environmental compliance process is governed by the California Environmental Quality Act (CEQA) and the CEQA Guidelines (Public Resources Code [PRC], Section 21000 et seq.; California Code of Regulations [CCR], Title 14, Section 15000 et seq.). CEQA was enacted in 1970 by the California Legislature to disclose to decision-makers and the public the significant environmental effects of projects and to identify ways to avoid or reduce the environmental effects through feasible alternatives or mitigation measures. Compliance with CEQA applies to California government agencies at all levels: local, regional, and State agencies, boards, commissions, and special districts (such as school districts and water districts). The Fullerton Joint Union High School District is the lead agency for the proposed project and is therefore required to conduct an environmental review to analyze the potential environmental effects associated with the proposed project.

1. INTRODUCTION

PRC Section 21080(a) states that analysis of a project's environmental impact is required for any "discretionary projects proposed to be carried out or approved by public agencies...." In this case, the lead agency has determined that an Initial Study is required to determine whether there is substantial evidence that construction and operation of the proposed project would result in environmental impacts.

A "project" means the whole of an action that has a potential for resulting in either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and that is any of the following:

- An activity directly undertaken by any public agency including but not limited to public works construction and related activities clearing or grading of land, improvements to existing public structures, enactment and amendment of zoning ordinances, and the adoption and amendment of local General Plans or elements thereof pursuant to Government Code Sections 65100 to 65700.
- An activity undertaken by a person which is supported in whole or in part through public agency contacts, grants, subsidies, loans, or other forms of assistance from one or more public agencies.
- An activity involving the issuance to a person of a lease, permit, license, certificate, or other entitlement for use by one or more public agencies. (14 CCR section 15378[a]).

The proposed discretionary actions by the project applicant constitute a "project" because the activity would result in a direct physical change in the environment and would be undertaken by a public agency. All "projects" in the State of California are required to undergo an environmental review to determine the environmental impacts associated with implementation of the project.

One of the primary objectives of CEQA is to enhance public participation in the planning process, so public involvement is an essential feature of CEQA. Community members are encouraged to participate in the environmental review process, request to be notified, monitor newspapers for formal announcements, and submit substantive comments at every possible opportunity afforded by the lead agency. The environmental review process provides several opportunities for the public to participate through public notice and public review of CEQA documents and at public meetings.

1.3 INITIAL STUDY

The purpose of the initial study is to 1) provide the lead agency with information to use as the basis for deciding the proper type of CEQA document to prepare; 2) enable the lead agency to

modify a project, mitigating adverse impacts before an environmental impact report (EIR) is prepared, thereby enabling the project to qualify for a negative declaration; 3) assist in the preparation of an EIR, if one is required; 4) facilitate environmental assessment early in the design of a project; 5) provide documentation of the factual basis for the findings in a mitigated negative declaration (MND) or negative declaration (ND); 6) eliminate unnecessary EIRs; and 7) determine if a project is covered under a previously prepared EIR. When an initial study identifies the potential for immitigable significant environmental impacts, the lead agency must prepare an EIR (14 CCR section 15064); however, if all impacts are found to be less than significant or can be mitigated to a less-than-significant level, the lead agency can prepare an ND or an MND, which incorporates mitigation measures into the project (14 CCR section 15070).

1.4 MITIGATED NEGATIVE DECLARATION

The MND includes information necessary for agencies to meet statutory responsibilities related to the proposed project. State and local agencies will use the MND when considering any permit or other approvals necessary to implement the project. A list of the environmental topics that have been identified for study in the MND is provided in the *Environmental Checklist* that precedes Chapter 1 of this initial study.

1.5 LEVELS OF SIGNIFICANCE

The following terminology is used to describe the level of significance of impacts. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- **No impact.** The project would result in no adverse effect on the environment.
- **Less than significant.** The project would not exceed the established significance criteria.
- **Less than significant with mitigation incorporated.** The project would exceed the established significance criteria without mitigation measures, but one or more mitigation measures would successfully reduce the impact to a less-than-significant level.
- **Potentially significant.** The project would exceed the established significance criteria, and either no feasible mitigation measures are available to reduce the impact to a less-than-significant level, or more analysis is needed to determine if feasible mitigation measures are available to reduce the impact to a less-than-significant level. If any impact is identified as potentially significant, an EIR is required.

1. INTRODUCTION

Mitigation Measures. If, after incorporation and implementation of federal, State, and local regulations, there are still significant environmental impacts, then feasible and project-specific mitigation measures are required to reduce impacts to less-than-significant levels. Mitigation measures must further reduce significant environmental impacts above and beyond compliance with federal, State, and local laws and regulations. Mitigation under CEQA Guidelines Section 15370 includes:

- Avoiding the impact altogether by not taking a certain action or parts of an action.
- Minimizing impacts by limiting the degree or magnitude of the action and its implementation.
- Rectifying the impact by repairing, rehabilitating, or restoring the impacted environment.
- Reducing or eliminating the impact over time by preservation and maintenance operations during the life of the action.
- Compensating for the impact by replacing or providing substitute resources or environments.

2. PROJECT DESCRIPTION

2.1 PROJECT LOCATION

Troy High School (TRHS or campus) is located at 2200 Dorothy Lane (Assessor Parcel Number [APN 283-291-02]) in the eastern portion of the City of Fullerton, California (City) (see Figure 1, *Regional Location*). The Troy High School Seismic and Field Improvements Project (proposed project) would encompass approximately 23.16-acres of the of the campus (see Figure 2, *Local Vicinity*, and Figure 3, *Aerial Photograph with Photo Locations*).

2.1.1 Regional Setting

The City of Fullerton is surrounded by the Cities of Brea and La Habra to the north; the Cities of Buena Park and La Mirada, and unincorporated Los Angeles County to the west; the City of Anaheim to the south; and the City of Placentia to the east. Regional access to the campus is provided by State Route 57 (SR-57) and State Route 91 (SR-91), which are approximately 0.70 miles east and 1.70 miles south of the campus, respectively (see Figure 1).

2.1.2 Local Setting

The campus is bordered by Dorothy Lane to the north, Hale Avenue and residential uses to the west, residential uses to the south, La Vista High School and California State University, Fullerton facilities (Auxiliary Services Corp, and Extension and International Programs) and State College Boulevard to the east.

2.2 ENVIRONMENTAL SETTING

2.2.1 Existing Land Use

TRHS is a 36.5-acre campus. TRHS is a 9th through 12th grade school and has an enrollment capacity of 2,479 students. It had 2024 enrollment of 2,545 students. The campus includes 13 permanent academic-related buildings, 16 storage containers, four storage containers, 16 shade structures, 10 tennis courts, hand ball courts, an aquatics center with bleachers, a school blacktop with painted play courts, including basketball courts, two softball fields, two baseball fields, soccer/multi-use fields, portable bleachers, dugouts, batting cages, a dirt track and field

2. PROJECT DESCRIPTION

with portable bleachers, three campus parking lots (two with solar EV systems), landscaping, and paved walkways throughout the campus.

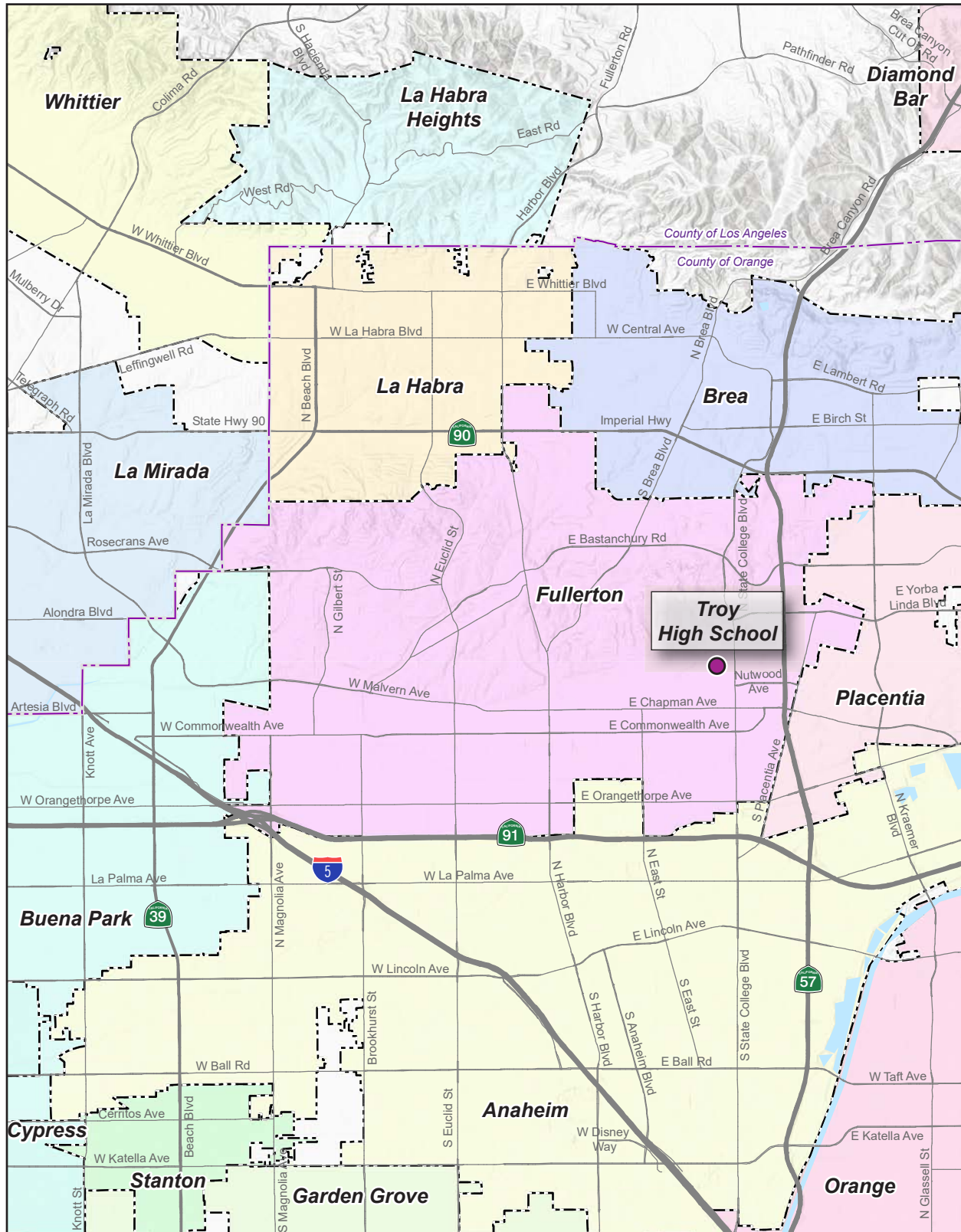
The 23.16-acre project site is developed with campus buildings (which includes the administration building and classroom buildings 100, 200, 300, 400, and 500), the southwestern parking lot, an existing track and field, three multi-use practice fields, two softball fields, two baseball fields, dugouts, portable bleachers, a long jump area, batting cages, storage sheds, storage containers, fencing, landscaped areas, and trees. The project site is primarily flat with a slight slope west to east (See Figure 3, Figure 4, *Project Site Photographs*, and Figure 5, *Surrounding Site Photographs*).

2.2.2 Parking and Access

The campus has three parking lots. One parking lot is located in the northwestern portion of the campus, one is located in the southwestern portion of the campus, and one is in the northeastern portion of campus. Vehicular access to the main (northeastern) surface parking lot is provided by one full access driveway and one egress-only driveway on Dorothy Lane. The main surface parking lot includes a one-way pick-up and drop-off area running parallel to Dorothy Lane west of the main surface parking lot. The pick-up and drop-off area connects to the western-most full-access driveway, which also provides access to the northwestern and southwestern parking lots. Vehicular access to the northwestern and southwestern parking lots is provided by the western-most full-access driveway on Dorothy Lane and a full access driveway on Hale Avenue. The main surface parking lot and the northwestern parking lot have solar electric vehicle charging systems. Additionally, sporting team buses access the project site via a driveway along State College Boulevard through the La Vista High School parking lot. Emergency access is provided via internal drive aisles from the two western parking lots, the main northeastern parking lot, and the driveway along State College Boulevard through the La Vista High School parking lot.

Pedestrian access to the campus is provided from sidewalks along public rights-of-way north and west of the campus. Alternative forms of transportation to the campus include bicycling and public bus service. A bicycle lane is available along Dorothy Lane. Orange County Transportation Authority (OCTA) bus routes 26 and 123 are approximately 0.16 miles southeast of the campus, and bus route 57 is approximately 0.25 miles northeast of the campus (see Figure 3).

Figure 1 - Regional Location



--- City Boundary

--- County Boundary

Note: Unincorporated county areas are shown in white.

Source: Nearmap 2025.

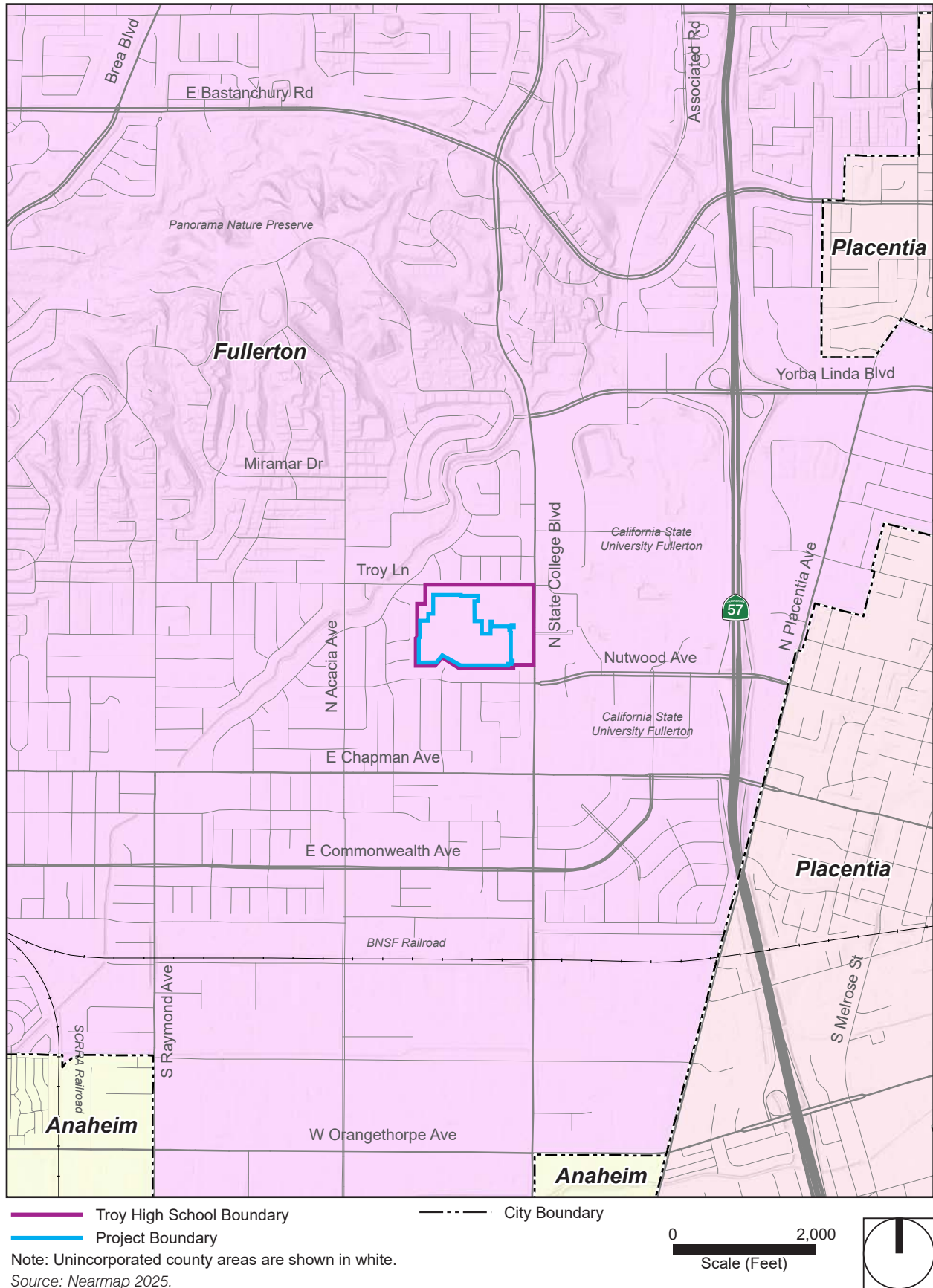
0 1.5
Scale (Miles)



2. PROJECT DESCRIPTION

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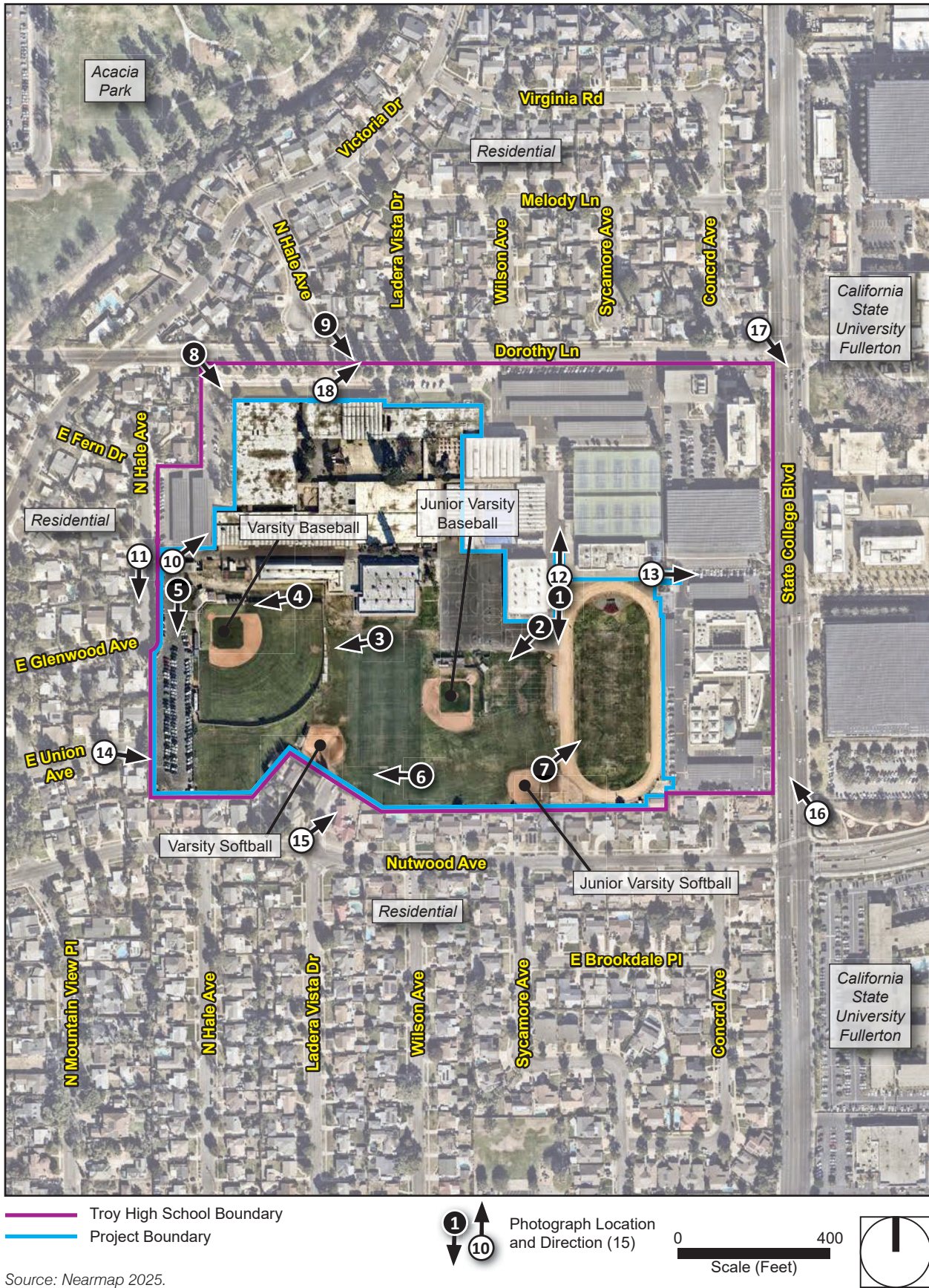
Figure 2 - Local Vicinity



2. PROJECT DESCRIPTION

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Figure 3 - Aerial Photograph with Photo Locations



2. PROJECT DESCRIPTION

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Figure 4 - Project Site Photographs



View 1. From the northern end of the track and field, looking south at the track and field, and storage shed in the distance on the project site.



View 2. From the northern end of the project site, looking southwest at a soccer field, and the backstop of the junior varsity baseball field on the project site.



View 3. From the west side of the junior varsity baseball field, looking west at a soccer field, the varsity softball field, the rear of the varsity baseball field, and surrounding landscaping on the project site.



View 4. From the western portion of the project site, looking southwest at the varsity baseball field with a backstop, a dugout, and portable bleachers, and surrounding landscaping on the project site.



View 5. From the western portion of the project site, looking south at the southwestern parking lot, and the varsity baseball field on the project site.



View 6. From the southern portion of the project site, looking west at the varsity softball field, a soccer field, and the rear of the varsity baseball field on the project site.



View 7. From the western portion of the track and field, looking northeast at the track and field on the project site.



View 8. From the western end of the pick-up and drop-off area on Troy High School, looking southeast at Classroom Building 300, and 200 on the project site.



View 9. From the northern portion of Dorothy Lane, looking southwest at Classroom Building 100 on the project site.

Source: PlaceWorks 2025.

2. PROJECT DESCRIPTION

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Figure 5 - Surrounding Site Photographs



View 10. From the northern portion of the project site, looking northeast at the northwestern campus parking lot surrounding the project site.



View 11. From the western end of the project site, looking south at the residential uses on N. Hale Avenue surrounding the project site, and vegetation blocking the southwestern campus parking lot on the project site.



View 12. From the north end of the track and field, looking north at the gymnasium, classrooms buildings, tennis and handball courts, and a vehicle access drive-isle surrounding the project site.



View 13. From the eastern end of the project site, looking east at the fire lane to the project site, and the La Vista High School classroom buildings and parking lot surrounding the project site.



View 14. From E Union Avenue looking southeast at the residential uses, and vegetation bounding the campus southwestern parking lot on the project site.



View 15. From the southeastern corner of Nutwood Avenue and Ladera Vista Drive, looking northeast at the residential uses along Nutwood Avenue.



View 16: From the western end of California State University Fullerton campus, looking northwest at the La Vista High School campus and parking lot across State College Boulevard.



View 17. From the northwestern corner of the State College Boulevard and Dorothy Lane intersection, looking southeast at the California State University Fullerton facilities on the western and eastern side of State College Boulevard.



View 18: From the northern end of the project site, looking northeast at the residential uses across Dorothy Lane.

Source: PlaceWorks 2025.

2. PROJECT DESCRIPTION

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2.2.3 Surrounding Land Use

TRHS is surrounded by residential uses, parks, and religious institutions to the north; residential uses to the west; residential, educational, and commercial uses to the south; and educational and residential uses to the east (see Figure 5).

The project site is surrounded the Troy High School pick-up and drop-off area, gymnasium, aquatics center, tennis courts and northeastern parking lot to the north; the La Vista High School campus and parking lot, California State University, Fullerton facilities (Auxiliary Services Corp, and Extension and International Programs), Troy High School gymnasium, aquatics center, tennis courts, and northeastern parking lot to the east; residential uses to the south; and classroom buildings, the northwestern campus parking lot, and residential uses to the east. The closest sensitive receptors to the project site are single-family residences bordering the project site to the south and to the west adjacent to the campus.

2.2.4 Existing General Plan Land Use and Zoning

The campus and project site have a General Plan Land Use designation of School (SCH) and a zoning designation of Public Land (P-L) (Fullerton 2025a).

The properties surrounding the campus have a General Plan land use designations of Low-Density Residential (LRES) and Parks and Recreation (PRC) to the north; LRES and None - Flood Control (FLO) to the west; LRES, Religious Use (REL), Commercial (COM), Office (OFF), and Medium Density Residential (MRES) to the south; and School (SCH), High Density Residential (HRES), and Office (OFF) to the east (Fullerton 2025a). Additionally, the associated zoning designations includes One-Family Residential (R-1-7.2 - 7,200 SF min. lot size) and Public Land (P-L) to the north; R-1-7.2 to the west; R-1-7.2, Office Professional (O-P), General Commercial (G-C), Limited Density, Multiple Family Residential (R-3), and Garden-Type Multiple Residential (R-G) to the south; and O-P, P-L, Maximum Density, and Multiple Residential (R-5) to the east (Fullerton 2025a).

2.2.5 Existing Programs and Activities

The campus has fifteen different bell schedules throughout the school year. During regular schedule days, classes begin at 8:30 AM and conclude at 3:30 PM. However, students with zero period begin at 7:28 AM, students with a seventh period conclude at 5:30 PM, and after-school activities continue after class dismissal.

The start times at TRHS range from 7:28 AM and 8:30 AM, and dismissal times at TRHS range from 12:45 PM and 5:30 PM. The District's six high schools share the existing football stadiums

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at Buena Park, Fullerton Union, and La Habra High Schools; as such, no major spectator events, including Varsity football games, currently occur at TRHS. Freshman and Junior Varsity (JV) football games are played at TRHS. The TRHS track and field has portable bleachers with an existing design capacity of 441 spectators. Existing track and field uses include, but are not limited to, Troy football and camps; band and colorguard summer camp; naval junior reserve officers training corps (NJROTC) basic leadership training; Troy football Orange County (OC) elite practice; Rich Hess special games (P. Stack); and best buddies Halloween event. Such events at the track and field stadium occur from July to December and March, Monday through Sunday within the hours of 6:30 AM to 5:00 PM. Activities range from 20 participants (Troy football OC elite practice) to up to 300 participants (Troy Football). Practices do not have spectators.

The existing soccer/multi-use fields, varsity and junior varsity softball fields and varsity and junior varsity baseball fields support the following athletic activities, including but not limited to, baseball practice, games, and events; softball practice, games, and events; boys and girls soccer practice, games, and events; girls flag football games; Troy football opening day ceremony; cheer clinic; coaching education course; NJROTC events; and OC sports performance camps. These events occur throughout the year Monday through Sunday within the hours of 7:00 AM to 8:00 PM, with activities ranging from 10 participants (NJROTC annual military inspection) to up to 850 participants (NJROTC athletic field meet). Practices do not have spectators.

Additionally, portable speakers are currently used as needed at the project site.

2.3 PROJECT CHARACTERISTICS

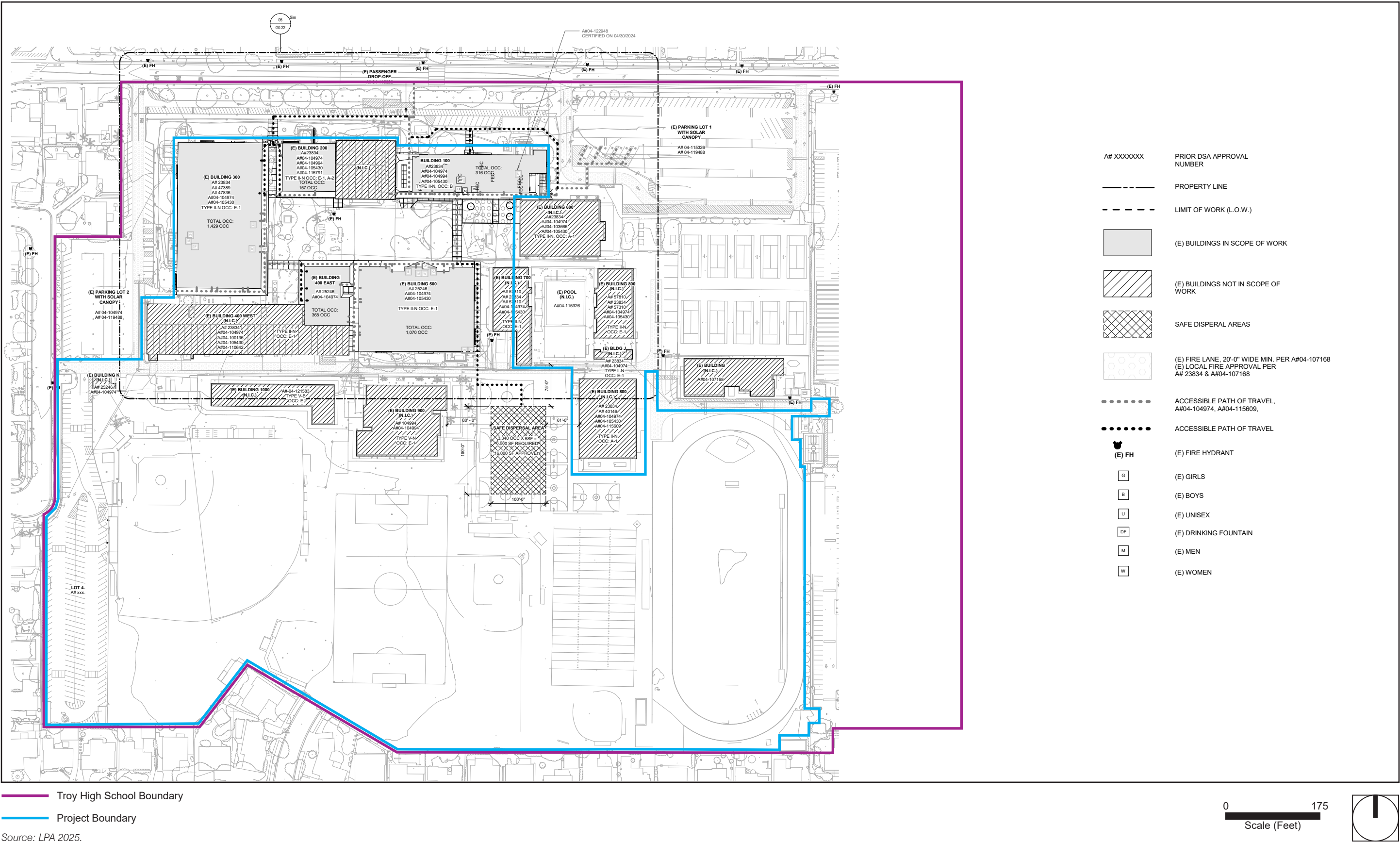
2.3.1 Proposed Improvements

The proposed project includes three primary components: (1) seismic retrofitting and modernization; (2) interim portable classrooms during seismic retrofitting construction and modernization; and (3) athletic field improvements. Each of these three components are discussed below.

Seismic Retrofitting and Modernization

The District proposes to seismically retrofit and modernize classroom buildings 300 and 500 and a portion of classroom buildings 200 and 400 and the administration building. See Figure 6, *Seismic Retrofitting and Modernization Site Plan*.

Figure 6 - Seismic Retrofitting and Modernization Site Plan



Source: LPA 2025.

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2. PROJECT DESCRIPTION

Seismic retrofitting would involve strengthening the existing buildings to make them more resistant to earthquake damage. As part of the seismically retrofitting process, the proposed project would include the existing roof-slabs being tied into the columns of the buildings for greater support. The process includes anchoring the building and associated structures to its foundation; reinforcing walls, columns, and beams; adding shear walls or steel bracing to resist lateral forces; and stabilizing soft or weak stories (such as open ground floors). It may also include securing non-structural elements—like ceilings, equipment, and facades—to prevent falling hazards during an earthquake.

As part of the retrofitting and modernization process, the proposed project would demolish interior and exterior finishings which would include flooring, roofing, walls, doors, windows, cabinets, sinks, water fountains, planters, skylights, and other non-structural building components. The demolition phase of the proposed project would also remove and cap all utilities as appropriate. The finishings would be replaced during the modernization process.

Modernization improvements for all buildings would include upgrades to both interior and exterior finishes, such as new flooring, roofing, concrete shear walls, plaster, paint, doors, windows, and cabinetry. For the administration building, specifically, the proposed project would also include a new internal layout to accommodate a student union area, restrooms, storage, a staff workroom, a student store, hallways, and custodial, electrical, and mechanical rooms, as well as other administration areas. The proposed project would also replace skylights in the administration building and in classroom buildings 300, 400, and 500.

Interim Classrooms

During the seismic retrofitting and modernization phase of the proposed project, the District would temporarily relocate students from classroom buildings 200 through 500 to interim portable classrooms on the TRHS Campus. The interim classrooms would consist of portable classrooms that would range in size from 919 square feet to 1,865 square feet and portable restrooms would also be installed. The portable classrooms and restroom buildings would include lighting installed on the outside of the buildings for security and safety and would be Americans with Disabilities Act (ADA) accessible. The interim portable classrooms would be installed in four clusters that would total 34 portable classrooms and two portable restrooms. Clusters 1 and 2 would consist of 14 portable classrooms located in the central part of the campus where the existing blacktop basketball courts are located. Clusters 3 and 4 would consist of 20 portable classrooms and two portable restroom buildings at the southwestern parking lot. As seismic retrofitting and modernization are complete at each classroom building, students would be relocated back into their respective classroom building. The portable classrooms and restroom buildings would be removed from the campus, and the parking lot and basketball courts would be returned to existing conditions. See Figure 7, *Interim Classroom Site Plan*.

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Athletic Field Improvements

The proposed project would install field lighting at the baseball and softball fields and bleachers and field lighting with a PA system at the track and field. As shown by Figure 8, *Sports Field Lighting Plan and Horizontal Light Spill*, and by Figure 9, *Sports Field Lighting Plan and Vertical Light Spill*, 19 field lights (light fixtures and poles) would be installed as part of the proposed project.

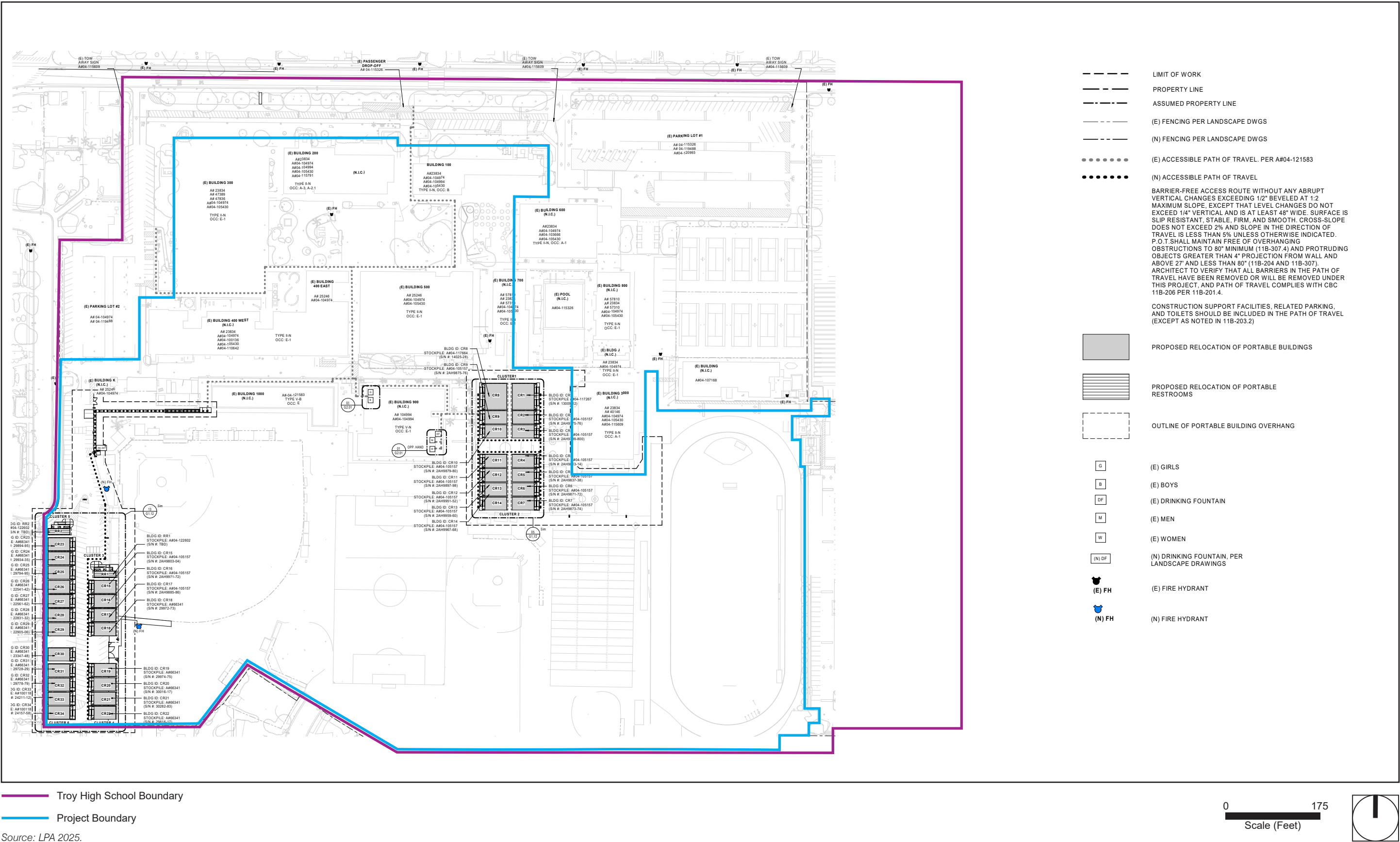
- Eight field lights would be located along the perimeter of the varsity baseball field. Four would have a height of 80 feet, and four would have a height of 70 feet.
- Three field lights would be located along the perimeter of the varsity softball field. Two of the field lights would have a height of 60 feet, and one field light would have a height of 50 feet.
- Two field lights would be located at the central soccer/multi-purpose field. One would have a height of 80 feet, and one field light would have a height of 70 feet.
- Six field lights would be located along the perimeter of the track and field. Four field lights would have a height of 80 feet, and two field lights would have a height of 60 feet. The proposed PA system (i.e., speakers) on the field lights at the track and field would be placed approximately 20 feet above grade.

Figures 8 and 9 also outline the potential light spill in foot-candles of the new sports field lighting.

To accommodate the improvements at the track and field, the proposed project would consist of demolition activities. Demolition activities would consist of removing the existing asphalt pavement north of the track and field, landscape, curb, track and field equipment (i.e., scoreboard, goal post, discuss cage, long jump areas, shot put area), storm drain system and catch basin, fencing and gates; and relocate the bleachers on the project site.

The District would install permanent bleachers at the practice track and field that would have a capacity of 2,200 seats to accommodate the TRHS's student body. The permanent bleachers would be approximately 22 feet in height and would be placed on new concrete pavement. Additionally, the proposed project would construct a 2,405 square-foot restroom and storage building west of the track and field, which would include a boys, girls, and staff restrooms; sports storage rooms; and an electrical room and custodian room.

Figure 7 - Interim Classroom Site Plan

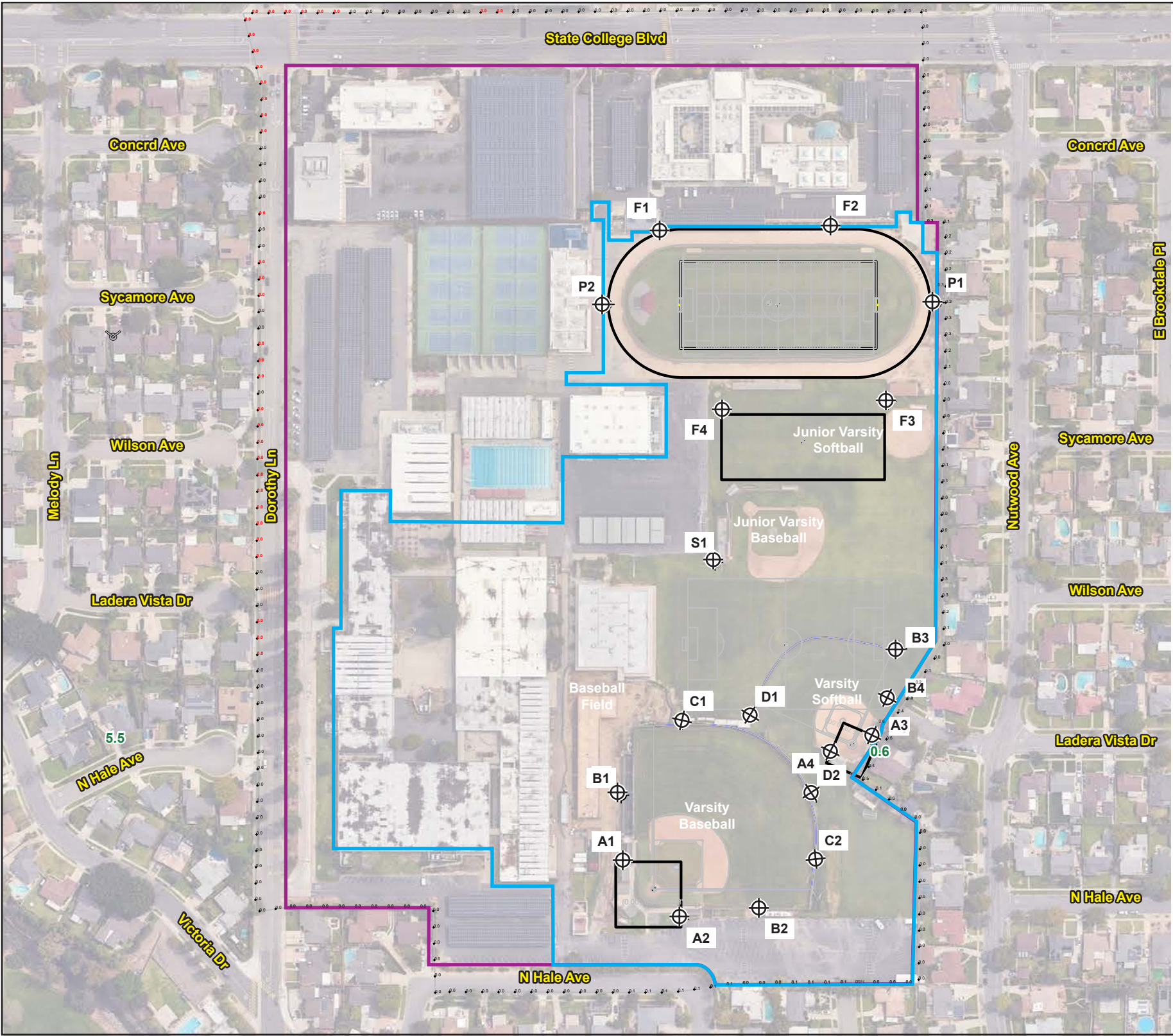


Source: LPA 2025.

2. PROJECT DESCRIPTION

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Figure 8 - Sports Field Lighting Plan and Horizontal Light Spill



Troy High School

Fullerton, CA

Grid Summary	
Name:	Spill @ 3ft.
Spacing:	30.0'
Height:	3.0' above grade

Illumination Summary	
	INITIAL HORIZONTAL FOOTCANDLES
Scan Average:	Entire Grid 0.0447
Maximum:	0.63
Minimum:	0.00
CU:	0.00
No. of Points:	207
FIXTURE INFORMATION	
Applied Circuits:	A,B,C,D,E,F,G,H,I,J
No. of Fixtures:	139
Total Load:	154.29 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document.

Field Measurements: Individual field measurements may vary from computer-calculated predictions.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.

LIGHTING SYSTEM						
Structure/Fixture Summary	Structure Height	Inst. Measurement Hgt.	Fixture Qty	Fixture Type	Fixture Load	Circuit
A1	80'	65'	4	TLC-LED-2500	5.59 kW	A
		65'	1	TLC-LED-1000	2.10 kW	A
		65'	1	TLC-LED-550	0.53 kW	B
A2	80'	65'	4	TLC-LED-2500	5.59 kW	A
		65'	1	TLC-LED-1000	2.10 kW	A
		65'	1	TLC-LED-550	0.53 kW	B
A3	50'	35'	3	TLC-LED-2500	2.64 kW	C
		35'	1	TLC-LED-1000	0.88 kW	D
		35'	1	TLC-LED-550	0.53 kW	C
A4	80'	65'	1	TLC-LED-2000	1.56 kW	C
		65'	1	TLC-LED-900	0.88 kW	C
		50'	1	TLC-LED-550	0.53 kW	D
B1	80'	65'	2	TLC-LED-2000	2.33 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
B2	80'	65'	2	TLC-LED-2000	2.33 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
B3	80'	65'	1	TLC-LED-2000	1.56 kW	A
		65'	1	TLC-LED-900	0.88 kW	A
B4	80'	65'	1	TLC-LED-2000	1.56 kW	A
		65'	1	TLC-LED-900	0.88 kW	A
C1	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
C2	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
C3	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
C4	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
D1	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
D2	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
D3	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
D4	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
E1	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
E2	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
F1	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
F2	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
F3	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
F4	80'	65'	3	TLC-LED-2000	3.49 kW	A
		65'	1	TLC-LED-1000	0.88 kW	A
		50'	1	TLC-LED-550	0.53 kW	A
			140		151.13 kW	

*Features in this design have dimmed output values to meet design specific needs.

Troy High School Boundary
Project Boundary

Pole location(s) with crosshair dimensions are relative to 0,0 reference point(s) with circle and crosshair

Source: MUSCO 2025.

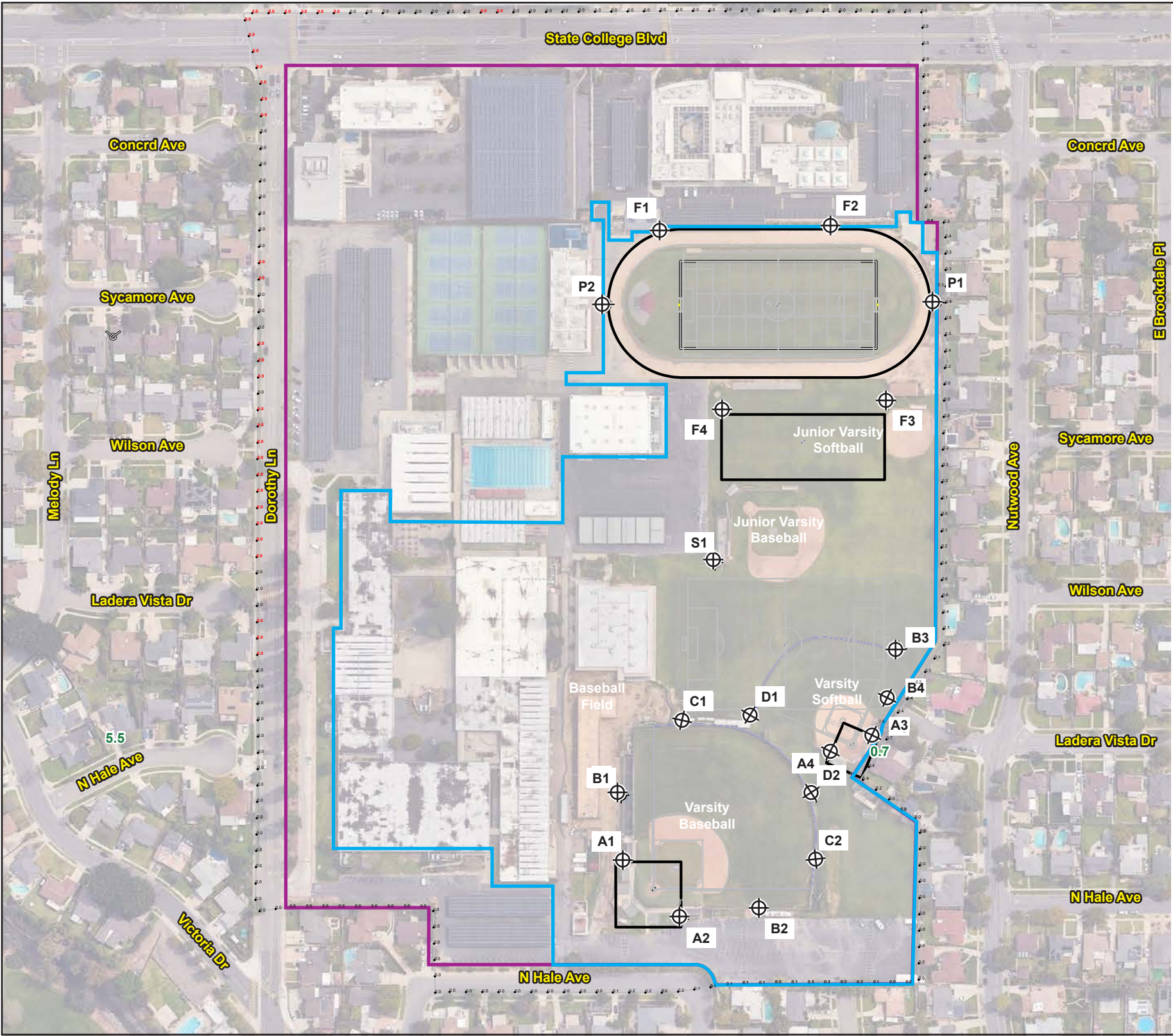
0 200
Scale (Feet)



2. PROJECT DESCRIPTION

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Figure 9 - Sports Field Lighting Plan and Vertical Light Spill



Troy High School Boundary
Project Boundary
Pole location(s) ⦿ dimensions are relative to 0,0 reference point(s) ⊗

Source: MUSCO 2025.

Troy High School

Fullerton, CA

Grid Summary	
Name:	Spill @ 5ft.
Spacing:	30.0'
Height:	5.0' above grade

Illumination Summary	
	INITIAL MAX VERTICAL FOOTCANDLES
Scan Average:	0.0741
Maximum:	0.69
Minimum:	0.00
CU:	0.00
No. of Points:	207
FIXTURE INFORMATION	
Applied Circuits:	A,B,C,D,E,F,G,H,I,J
No. of Fixtures:	139
Total Load:	154.29 kW

Guaranteed Performance: The ILLUMINATION described above is guaranteed per your Musco Warranty document.

Field Measurements: Individual field measurements may vary from computer-calculated predictions.

Electrical System Requirements: Refer to Amperage Draw Chart and/or the "Musco Control System Summary" for electrical sizing.

Installation Requirements: Results assume ± 3% nominal voltage at line side of the driver and structures located within 3 feet (1m) of design locations.

LIGHTING SYSTEM						
Structure/Fixture Summary						
Structure 1						
	Structure Height	Fix. Attachment Ht.	Fixture Qty	Fixture Type	Design Load	Circuit
A1	80'	80'	4	TLC-LED-2500	5.59 kW	A
		65'	1	TLC-LED-1000	2.10 kW	A
		15'	1	TLC-LED-550	0.53 kW	B
A2	80'	80'	4	TLC-LED-2500	5.59 kW	A
		65'	1	TLC-LED-1000	2.10 kW	A
		15'	1	TLC-LED-550	0.53 kW	B
A3	50'	50'	3	TLC-LED-2500	2.64 kW	C
		35'	1	TLC-LED-1000	0.88 kW	D
		15'	1	TLC-LED-550	0.53 kW	C
A4	50'	50'	3	TLC-LED-2500	2.64 kW	C
		35'	1	TLC-LED-1000	0.88 kW	C
		15'	1	TLC-LED-550	0.53 kW	D
B1	80'	80'	4	TLC-LED-2500	5.59 kW	A
		65'	1	TLC-LED-1000	2.10 kW	A
		15'	1	TLC-LED-550	0.53 kW	B
B2	80'	80'	2	TLC-LED-1200	2.33 kW	A
		65'	2	TLC-LED-1200	4.66 kW	A
		15'	1	TLC-LED-550	0.53 kW	A
B3	70'	70'	3	TLC-LED-1200	3.99 kW	H
		55'	1	TLC-LED-575	0.52 kW	H
		15'	1	TLC-LED-550	0.53 kW	H
B4	60'	60'	2	TLC-LED-1200	3.92 kW	H
		45'	2	TLC-LED-1200	7.84 kW	H
		15'	1	TLC-LED-575	0.52 kW	I
C1	70'	70'	3	TLC-LED-1200	4.19 kW	I
		55'	1	TLC-LED-575	0.52 kW	A
		15'	1	TLC-LED-550	0.53 kW	A
C2	70'	70'	3	TLC-LED-1200	3.49 kW	A
		55'	1	TLC-LED-575	0.52 kW	A
		15'	1	TLC-LED-550	0.53 kW	A
D1	70'	70'	1	TLC-LED-500	0.88 kW	H
		70'	1	TLC-LED-1200	3.49 kW	H
		70'	3	TLC-LED-1000	4.19 kW	H
D2	70'	70'	1	TLC-LED-500	0.52 kW	H
		70'	3	TLC-LED-575	4.19 kW	H
		15'	1	TLC-LED-575	0.17 kW	H
D3	70'	70'	1	TLC-LED-1200	3.49 kW	A
		70'	3	TLC-LED-1000	4.19 kW	A
		15'	1	TLC-LED-575	0.57 kW	A
F1-F2	80'	80'	2	TLC-LED-1200	7.84 kW	E
		65'	2	TLC-LED-1200	9.79 kW	E
		15'	2	TLC-LED-575	0.53 kW	E
F3-F4	80'	80'	2	TLC-LED-1200	1.55 kW	E
		65'	2	TLC-LED-1200	3.10 kW	E
		15'	2	TLC-LED-575	1.76 kW	I
F5	50'	50'	2	TLC-LED-800	1.76 kW	I
		40'	2	TLC-LED-1200	2.33 kW	I
		15'	2	TLC-LED-575	0.53 kW	E
F7	60'	60'	2	TLC-LED-1200	1.55 kW	E
		40'	2	TLC-LED-1200	2.64 kW	F
		15'	2	TLC-LED-575	2.64 kW	F
F9	80'	80'	140	TLC-LED-550	511.13 kW	I

2. PROJECT DESCRIPTION

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2. PROJECT DESCRIPTION

The track and field improvements would include construction of a new rubberized synthetic track with a new synthetic turf field, a golf putting green, long jump area, discus pad and cage; the replacement of the football goal post, and scoreboard; reconstruction of the shotput field; installation of a 9,300 cubic foot (CF) infiltration system, new fencing around the track and field, and field striping. The discus pad and cage would be constructed at the eastern edge of the existing soccer field. In addition, a 25-foot-tall protective steel wire rope netting would be installed from the southern end of the golf putting green to the northern end of the shotput area. See Figure 10, *Athletic Field Improvements Site Plan*.

Landscaping, Hardscape and Fencing

The proposed project would include landscaping within the project site. Landscaping would consist of planting Chinese Elm trees and various shrubs throughout the project site.

To accommodate the athletic field improvements, the proposed project would repave a portion of the paved area at the northern portion of the track and field. The track and field and shot-put area would be encompassed by a concrete walkways. In addition, the bleachers would be installed on concrete pavement which includes the pedestrian walkways to the bleachers.

New fencing would be installed at the perimeter of the track, and gates at the rear of the bleachers. Fencing and gates would also be installed on the eastern side of Clusters 3 and 4 of the portable classrooms. No existing trees would be removed.

Parking and Access

The proposed project would not involve any off-site improvements. However, during the interim classroom phase, the southwestern parking lot—containing 183 parking spaces—would be used to accommodate Clusters 3 and 4 of the portable classrooms and the two modular restroom buildings, making the lot temporarily unavailable for vehicle parking. During this period, the District would provide alternative parking at the District-owned La Vista High School, adjacent to TRHS. After the interim classroom phase concludes, vehicle access and parking in the southwestern lot would resume.

Proposed Programming and Activities

With the addition of field lights, the proposed project would extend evening practices within the hours of 3:30 PM to 8:00 PM for 7 sports/activities including Troy baseball, Troy athletics, boys and girls practice and games, girls flag football, California State University, Fullerton reserve officers training corps, softball practice, youth practice, and Troy football OC elite practice. Practices would not have spectators.

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Additionally, the District intends to host schoolwide assemblies at the track and field with the addition of new bleachers that can accommodate the entire student body. These schoolwide assemblies would occur within the regular school operating hours. Schoolwide assemblies are not daily events and would occur periodically throughout the school year.

No other changes to operations are proposed as part of the proposed project. Specifically, the proposed project would not result in any changes to the number of participants, time of year (season), or number of spectators for practices and games. The proposed project would not introduce any new practices, games, or events at the fields or on-campus. Further, schoolwide assemblies would occur within regular school operating hours and would not alter start and dismissal times of TRHS. The proposed project would not increase student capacity nor enrollment at TRHS. Freshman and JV football games would continue to be played at TRHS while major spectator events, such as Varsity football games, will continue to occur at Buena Park, Fullerton Union, and La Habra High Schools.

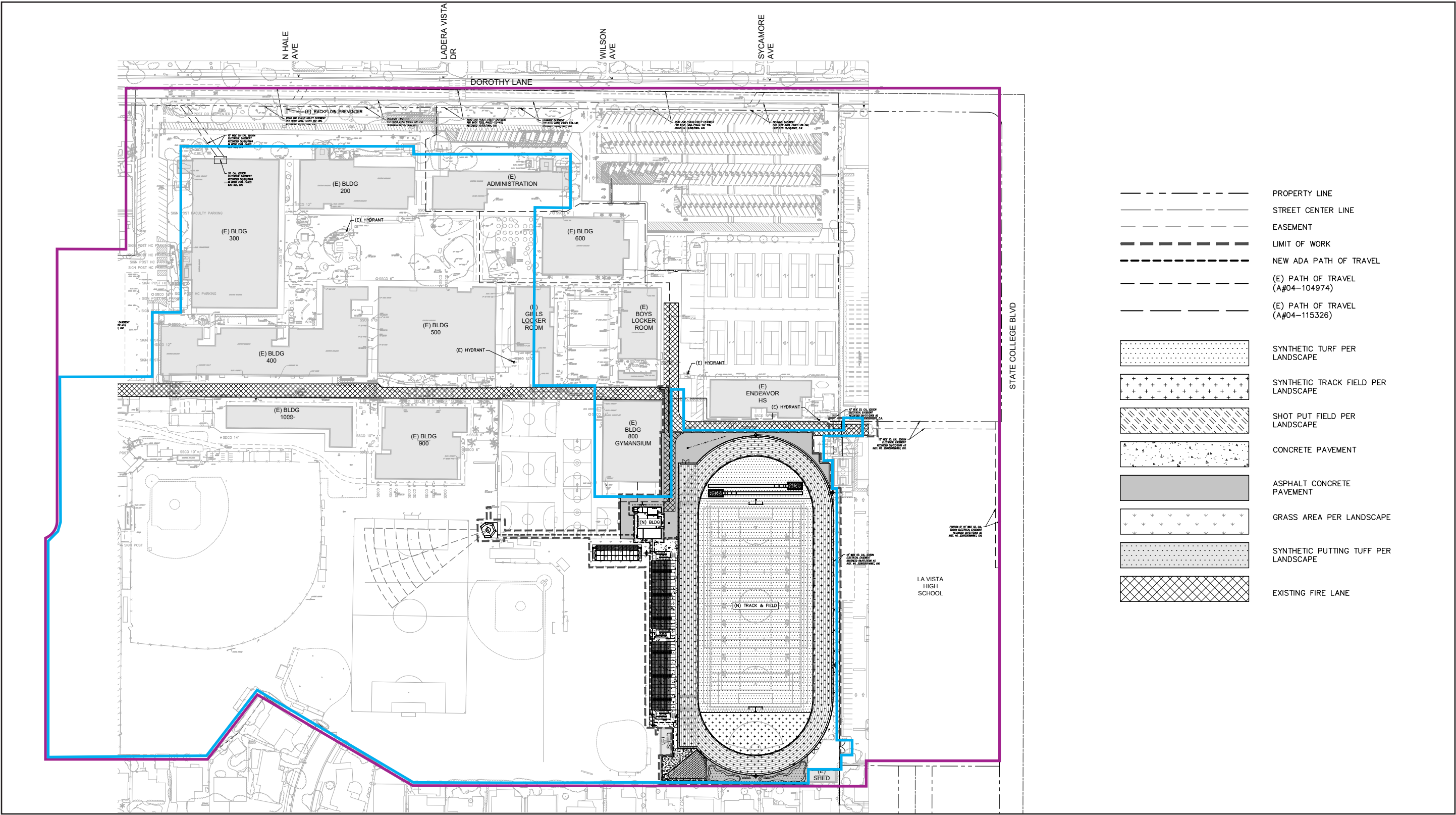
2.3.2 Project Construction

Construction of the seismic retrofitting and modernization part of the proposed project is anticipated to occur in three phases and is anticipated to start in August 2026 and end in August 2028. Phase one is anticipated to occur from August 2026 to September 2026 and would include the seismic retrofitting and modernization of classroom building 300. Phase two is anticipated to occur from April 2027 to December 2027 and would include the seismic retrofitting and modernization of classroom buildings 400 and 500 and Phase three is anticipated to occur from December 2027 to August 2028 and would include the seismic retrofitting and modernization of classroom building 200 and the administration building. Interim portable classrooms would be added and removed in line with the seismic and modernization improvements to provide adequate classroom space during construction. All construction staging and worker parking would be provided onsite.

Construction of the track and field part of the proposed project would occur in one phase and is anticipated to occur from April 2026 to September 2026.

Additionally, the proposed project would comply with the City's noise standards and regulations, found in Chapter 15.90 of the City's Municipal Code, which states that construction, repair, remodeling, or grading of any real property shall be exempt from the noise level standards provided they take place between the hours of 7:00 AM and 8:00 PM on any day except Sunday or a City-recognized holiday.

Figure 10 - Athletic Field Improvements Site Plan



- PROPERTY LINE
- STREET CENTER LINE
- EASEMENT
- LIMIT OF WORK
- NEW ADA PATH OF TRAVEL
- (E) PATH OF TRAVEL (A#04-104974)
- (E) PATH OF TRAVEL (A#04-115326)
- SYNTHETIC TURF PER LANDSCAPE
- SYNTHETIC TRACK FIELD PER LANDSCAPE
- SHOT PUT FIELD PER LANDSCAPE
- CONCRETE PAVEMENT
- ASPHALT CONCRETE PAVEMENT
- GRASS AREA PER LANDSCAPE
- SYNTHETIC PUTTING TUFF PER LANDSCAPE
- EXISTING FIRE LANE

Troy High School Boundary
Project Boundary

Source: RCE 2025.



2. PROJECT DESCRIPTION

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2. PROJECT DESCRIPTION

2.4 REQUIRED PERMITS AND APPROVALS

The District is the lead agency under CEQA and is carrying out the proposed project. The District Board of Trustees (Board) must approve the proposed project and adopt the IS/MND and Mitigation Monitoring and Reporting Program (MMRP). The Board will consider the information in the IS/MND when making its decision to approve or deny the proposed project, or in directing modifications to the proposed project in response to the IS/MND's findings and mitigation measures. The IS/MND is intended to disclose to the public the proposed project's details, analyses of the proposed project's potential environment impacts, and identification of feasible mitigation that would lessen or reduce significant impacts to less-than-significant levels.

The District is the lead agency under CEQA and has approval authority over the proposed project. The proposed project would also require approval and/or coordination from responsible agencies. See Table 1, *Discretionary Approvals and Permits*.

Table 1 Discretionary Approvals and Permits

Lead Agency	Action
Fullerton Union High School District	• Approve the proposed project • Adopt the Initial Study/Mitigated Negative Declaration • Adopt the Mitigation Monitoring and Reporting Program
Responsible Agencies	Action
Department of General Services, Division of State Architect	• Approval of construction drawings
California Department of Education, School Facilities Planning Division	• Approval of school site layout • Verify compliance with educational facility design standards and siting criteria
Santa Ana Regional Water Quality Control Board	• Review of Notice of Intent to obtain permit coverage • Issuance of general permit for discharges of stormwater associated with construction activity • Review of Storm Water Pollution Prevention Plan
South Coast Air Quality Management District	• Approval of Construction Permit

2. PROJECT DESCRIPTION

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3. ENVIRONMENTAL EVALUATION

This section includes a checklist for each environmental topic, evaluates the significance criteria in the checklists, and, if necessary, provides mitigation measures to reduce potential impacts.

I. Aesthetics

Except as provided in Public Resources Code Section 21099, would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

DISCUSSION

a) *Would the proposed project have a substantial adverse effect on a scenic vista?*

The Fullerton General Plan and Fullerton Municipal Code (FMC) do not identify any scenic vistas within the City. However, the General Plan EIR identifies that gently rolling hills offer long range views and broad vistas which include, but are not limited to, East and West Coyote Hills

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(Fullerton 2012b). East Coyote Hills is approximately 1 mile north of the project site. The campus is not visible from the East Coyote Hills nature preserve or public rights of ways (Google Earth 2025). Thus, the proposed project would not obstruct or have a substantial adverse effect on a scenic vista.

The General Plan EIR states the dominant visual resources elements in the City are existing buildings and roadways, as well as views of canyons, hillsides, and ridges primarily associated with the East and West Coyote Hills area (Fullerton 2012b). East Coyote Hills and other nearby hills or ridgelines are not visible from the project site or public right of way (see Figure 4 and 5). In addition, the project site and surrounding area are primarily developed and contain vegetation that block views to and from the project site. The proposed project would seismically retrofit and modernize existing academic related buildings, construct interim portable classrooms, and provide improvements to the athletic fields, including field lighting and a new restroom and storage building. The proposed restroom and storage building would have a height similar to existing on campus educational related buildings, and comparable with surrounding educational related buildings (La Vista High School, and California State University Fullerton Facilities) and one- to two-story residential uses surrounding the campus.

Therefore, public right-of-way views, including long-range views toward the hillsides, would largely remain in their existing condition, and the project would not substantially block views of ridgelines or hillsides. The proposed project would not have a substantial effect on scenic resources or vistas. Impacts would be **less than significant**.

b) *Would the proposed project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

Scenic resources in the City include buildings and roadways, canyons, hillsides, and ridges primarily associated with the East and West Coyote Hills (Fullerton 2012b). As discussed in Section I(a), the proposed project and surrounding areas are developed and include intensive vegetation with no notable visual resource visible from the project site or public rights of way (see Figure 4 and 5). The proposed project would have a height compatible with educational related buildings on-site and in the surrounding area, and one- to two-story residential uses. The project site is flat, with no ridgelines, hillsides, or rock outcroppings onsite. Although, the project site contains trees on site, none will be removed as part of the proposed project.

The nearest officially designated state scenic highway is a section of State Route 91 (SR-91) near Anaheim Hills, approximately 4.5 miles southeast of the project site (Caltrans 2018). The nearest eligible state scenic highway to the project site is a section of SR-57 approximately 2.25 miles north of the project site. Due to the distance, topography, and intervening development, the project site is not visible from SR-91 or SR-57. Therefore, the proposed project would not damage scenic resources within a state scenic highway, and **no impact** would occur.

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- c) ***Would the proposed project, in nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?***

As defined by Public Resources Code Section 21071, for an incorporated city, an “urbanized area” is a city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons. The City of Fullerton has an estimated population of 141,278 people (US Census 2023). Therefore, the project site is in an urbanized area.

The campus and project site have a General Plan Land Use designation of School (SCH) and a zoning designation of Public Land (P-L) (Fullerton 2025a). The proposed project would not alter the site’s land use and zoning; would not conflict with any applicable land use plans, policies, or regulations; and would adhere to the architectural design guidelines of the Division of State Architects (DSA). Therefore, the proposed project would not conflict with applicable zoning or regulations governing scenic quality, and no impact would occur.

As discussed above, the City and project site is an urbanized area. The proposed project would not alter or change the character of the campus, as new structures would be consistent with the character of educational uses. As discussed in Section I(a), the proposed project would not degrade or damage scenic vistas since the site is not visible from East Coyote Hills, the closest scenic vista, or visual resources as none are visible from the public rights of way surrounding the campus (see Figure 4 and Figure 5). The proposed interim portable classrooms and portable restroom building would be installed/constructed within the boundaries of the campus and not be visible due to existing academic related buildings and vegetation. The 25-foot-tall protective steel wire rope netting would not be visible from a publicly accessible vantage point, as the netting would be an open netting which would allow visibility. The stadium lighting poles would potentially be visible from the public right of way or other publicly accessible vantage point, depending on the distance. However, the installation of the lighting poles would not substantially degrade views of the site or surrounding area, due to the existing academic related buildings, vegetation, and surrounding uses (educational, and residential uses). Therefore, impacts would be **less than significant**.

- d) ***Would the proposed project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?***

The **foot-candle (fc)** is a unit based on English measurements. Although foot-candles are considered obsolete in some scientific circles, they are nevertheless used because many existing light meters are calibrated in foot-candles. Full Moon produces approximately 0.01 fc, and direct sunlight can produce up to 10,000 fc. The general benchmarks for light levels are shown in Table 2, *General Light Levels Benchmark*.

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Table 2 General Light Levels Benchmark

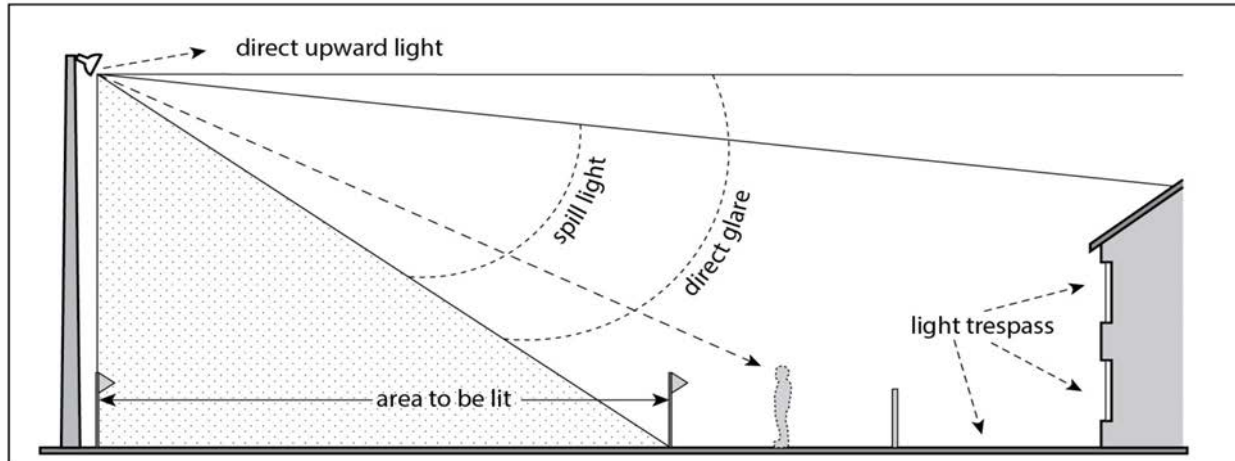
Outdoor Light	Foot-Candles
Direct Sunlight	10,000
Full Daylight	1,000
Overcast Day	100
Dusk	10
Twilight	1
Deep Twilight	0.1
Full Moon	0.01
Quarter Moon	0.001
Moonless Night	0.0001
Overcast Night	0.00001

Source: HSI 2019

- **Horizontal foot-candle.** The amount of light received on a horizontal surface such as a roadway or parking lot pavement.
- **Vertical foot-candle.** The amount of light received on a vertical surface such as a billboard or building façade.
- **Glare** means lighting entering the eye directly from a light fixture or indirectly from reflective surfaces that causes visual discomfort or reduced visibility. Glare can be generated by building-exterior materials, surface-paving materials, vehicles traveling or parked on roads and driveways, and sports lights. Any highly reflective façade material is a concern because buildings can reflect bright sunrays. The concepts of spill light, direct glare, and light trespass are illustrated in Exhibit A, Spill Light, Direct Glare, and Light Trespass, adapted from the Institution of Lighting Engineers (ILE 2003).
- **Direct glare** is caused by looking at an unshielded lamp or a light at maximum candlepower. Direct glare is dependent on the brightness of the light source, the contrast in brightness between the light source and the surrounding environment, the size of the light source, and its position.

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Exhibit A: Spill Light, Direct Glare, and Light Trespass



- **Illuminance** is the amount of light on a surface or plane, typically expressed in a horizontal plane (e.g., on the ground) or in a vertical plane (e.g., on the side of a building).
- **Lumen** means the unit of measure used to quantify the amount of visible light produced by a light source or emitted from a luminaire (as distinct from “watt,” a measure of power consumption).
- **Luminaire** means outdoor electrically powered illuminating devices that include a light source, outdoor reflective or refractive surfaces, lenses, electrical connectors and components, and all parts used to mount the assembly, distribute the light, and/or protect the light source, whether permanently installed or portable. An important component of luminaires is their shielding:
 - **Fully shielded.** A luminaire emitting no light above the horizontal plane.
 - **Shielded.** A luminaire emitting less than 2 percent of its light above the horizontal plane.
 - **Partly shielded.** A luminaire emitting less than 10 percent of its light above the horizontal plane.
 - **Unshielded.** A luminaire that may emit light in any direction.
- **Light trespass** means light that falls beyond the property on which it originates. The amount of trespass is expressed in foot-candles and is measured in the vertical plane at five feet above grade at the property line of the site on which the light(s) is located. If the adjacent property is a street, alley, or sidewalk, the point at which trespassing light is measured is the center of the street, alley, sidewalk, or right-of-way. Field measurements to determine light trespass compliance do not include the effect of light produced by streetlights.
- **Sky Glow** is light that reflects into the night sky and reduces visibility of the sky and stars. It is a concern in many jurisdictions, especially those with observatories.
- **Spill light** is caused by misdirected light that illuminates areas outside the area intended to be lit. Spill light can contribute to light pollution.

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Regulatory Setting and Industry Standard

Municipal Code

The City of Fullerton does not establish a significant threshold for light spill for outdoor lighting near residential areas. The FMC does identify light spill thresholds for automotive dealerships (FMC Section 15.30.040), Movie Arcades (FMC Section 7.122.200), peep show establishments (FMC Section 7.120.200), and adult uses (FMC Section 7.95.070); none of which apply to the proposed project.

A Night Sky Ordinance is a common policy set by local municipalities that regulates outdoor lighting to reduce light pollution and other adverse effects. A Night Sky Ordinance was also not found within the City's General Plan, Municipal Code, and website.

Although the FMC does not address general light shielding/screening, direction, or control, the FMP does discuss such requirements for certain uses, such as lighting on derricks. FMC Section 15.22.130 states that lighting on derricks shall be shielded to protect surrounding residences from glare and that lighting be kept to a minimum to maintain the normal nighttime levels.

It is assumed that the proposed project would include typical light and glare control practices, such as lights needing to be directed, controlled, screened or shaded as not to shine directly on surrounding properties; lighting needing to be controlled to prevent glare; and prohibiting the use of unshaded clear bulbs in exterior lighting. These are typical light control practices, and it is assumed that the proposed project's lighting would be directed, controlled, screened or shaded as not to shine directly on surrounding properties.

Industry Standard

The International Commission on Illumination (CIE) *Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations* (2nd Edition) provides quantitative metrics to analyze the impact of light and glare (CIE 2017). The Guide identifies lighting thresholds based on five environmental lighting zones (E0, intrinsically dark, to E4, high district brightness). Environmental Lighting Zone E3, medium district brightness, (such as well inhabited rural and urban settlements) would be most applicable to the proposed project's urban context. Environmental Lighting Zone E3 establishes the following lighting thresholds:

- Pre-Curfew Mixed-Use/Suburban = 0.9 foot-candle
- Post-Curfew Mixed-Use/Suburban = 0.2 foot-candle

The Illuminating Engineering Society (IES) and the International Dark-Sky Association (IDA)'s Model Lighting Ordinance (MLO) provides guidance for communities to develop effective lighting control ordinances (IES 2011). The MLO provides the following light spill thresholds:

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- Rural/Low Density = 0.1 foot-candle
- Mixed-use/Suburban Density = 0.3 foot-candle
- City/Urban = 0.8 foot-candle

Establishing an Appropriate Threshold

Since the City of Fullerton does not identify a light spill threshold, we referred to industry standards to establish an appropriate light spill threshold. Of the two industry standards identified above, the CIE's 0.9 fc pre-curfew threshold for Environmental Lighting Zone E3 most closely matches the urban context of the proposed project from among the thresholds presented above. In addition, this threshold was selected because it includes both pre- and post-curfew standards that consider the time of day at which lighting impacts would occur, which is an important consideration for lighting associated with the proposed project.

Curfew hours are defined by the FMC Chapter 6.20, Nighttime Curfew for Minors, which sets a curfew of 10:00 PM to 6:00 AM. Since the proposed project's operations would end at 8:00 PM, the following discussion evaluates the potential for 0.9 fc; any residential/suburban property receiving a 0.9 fc or greater level of spill light would be considered impacted.

Sensitive Receptors

Certain land uses are particularly sensitive to light and glare. The Fullerton General Plan and Municipal Code does not specify land uses sensitive to light and glare. Sensitive receptors for lighting are existing uses that could be negatively affected by excessive nighttime lighting, such as residences, residential care facilities, schools, hotels, and motels. Sensitive receptors for glare are motorists/drivers, residences, residential care facilities, schools, hotels, and motels.

The proposed project is surrounded by TRHS to the north, educational uses to the east, and residential uses to the west and south. Additionally, residential uses are across the campus and Dorothy Lane to the north. The closest light sensitive receptor to the project site are single-family residences bordering the project site to the south and to the west beyond the campus. The residences to the north are approximately 25 feet from the closest light pole (A3), and the residences to the east are approximately 135 feet away from the closest light pole (B2) (see Figure 8 and 9).

Field Lighting

The proposed light poles are setback from the campus perimeter fencing. The closest light pole (A3) along the southern boundary of the project site is approximately 25 feet from the residential property line to the south. The closest light pole (B2) along the western project site boundary is approximately 135 feet from the residential property line to the west. The 19 proposed field lights would vary in height, ranging from 50 to 80 feet. See Figure 8 and Figure 9.

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As discussed in the project description, the proposed project would allow for identified existing practices, games, and events to continue until a maximum of 8:00 PM. Figure 8 and Figure 9, show that the proposed sports field lighting system would create a maximum vertical light spill of 0.7 fc and a maximum horizontal light spill of 0.6 fc, which are below the 0.9 fc threshold. Once practices, games, and events conclude field lights would be lowered to allow for safe exit and cleanup after 8:00 PM until curfew hours, keeping light levels below the 0.2 fc post-curfew CIE threshold. The maximum hours of operation of the proposed field lights would not exceed the 10:00 PM to 6:00 AM curfew hours in the City of Fullerton. Thus, the proposed project would comply with the City of Fullerton curfew and would be below the CIE threshold pre and post-curfew. Therefore, the proposed project is anticipated to result in a **less than significant** impact.

Glare

As discussed in the project description, the proposed project would allow for identified existing practices, games, and events to continue until a maximum of 8:00 PM. The proposed project would retrofit existing academic related buildings, construct interim portable classrooms, and provide improvements to the athletic fields, including field lighting and a new restroom and storage building. The proposed project would not result in a major source of reflective surfaces and would largely remain consistent with existing conditions on the project site, and the existing campus and surrounding walls and vegetation would block sources of glare.

Since the proposed project would not generate new students nor spectators, vehicles associated with the proposed project would be similar to existing conditions and would not generate a new substantial source of nighttime glare. Additionally, the LED luminaires would be shielded and directed downward and away from the adjacent sensitive uses. TRHS sporting events would adhere to the District's 8:00 PM lighting restriction, with field lights being lowered to allow for safe exit and cleanup after 8:00 PM until curfew hours. Additionally, the field lights would include an automated shut-off timer. Thus, the District would not create glare impacts past curfew hours (10:00 PM to sunrise) and therefore, impacts associated with glare would be **less than significant**.

II. Agriculture and Forestry Resources

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the

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Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board (CARB).

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

DISCUSSION

- a) *Would the proposed project convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the*

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Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

The California Important Farmland Finder is produced by the Farmland Mapping and Monitoring Program (FMMP) pursuant to Section 65570 of the California Government Code. According to the FMMP, agricultural land is rated according to soil quality and irrigation status and is divided into five categories: Prime Farmland, Farmland of Statewide Importance, Farmland of Local Importance, Unique Farmland, and Grazing Land. The best quality land is Prime Farmland (CDC 2025a). Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Unique Farmland is farmland of lesser quality soils used for the production of the state's leading agricultural crops.

According to the California Important Farmland Finder, the project site is designated as Urban Built-Up Land, and is not designated Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Urban Built-Up Land is defined as land occupied by structures with a building density of at least 1 unit to 1.5 acres, or approximately 6 structures to a 10-acre parcel. (CDC 2025a). As such, the proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Additionally, the proposed project would be developed on the existing TRHS campus which is exclusively surrounded by non-agriculture uses. Therefore, **no impact** would occur.

b) *Would the proposed project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

The project site has a General Plan land use designation of SCH and is zoned P-L which does not allow for agricultural uses. Since the proposed project is not designated or zoned for agricultural uses, the proposed project would not conflict with existing zoning for agricultural use.

Williamson Act contracts restrict the use of privately owned land to agriculture and compatible open-space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no land contracted under the Williamson Act for agricultural use on-site or within the immediate vicinity of the site (CDC 2025b).

Therefore, the project would not conflict with an existing Williamson Act contract and **no impact** would occur.

c) *Would the proposed project conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?*

The project site is developed and has a land use designation of SCH and is zoned P-L. No forested land nor timberland exists onsite. Further, the proposed project site is not zoned for forest land or timberland. Therefore, development of the proposed project would not conflict with existing zoning for forestland or timberland. **No impact** would occur.

3. ENVIRONMENTAL EVALUATION

d) *Would the proposed project result in the loss of forest land or conversion of forest land to non-forest use?*

The project site is located on the campus of an existing high school within an urbanized area, and no forest land uses are present onsite nor in the immediate vicinity. Development of the proposed project would not require any changes to the existing environment that could result in the conversion of forest land to non-forest use. Therefore, **no impact** would occur.

e) *Would the proposed project involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?*

As shown in Figure 3, the project site is not adjacent to agricultural uses and is located on the campus of an existing high school within an urbanized area. Development of the proposed project would not result in any changes to the existing environment that could result in the conversion of farmland to nonagricultural uses or forest land to non-forest use. Therefore, **no impact** would occur.

III. Air Quality

The Air Quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthful pollutant concentrations. A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the project site, and air quality modeling can be found in Appendix A.

The primary air pollutants of concern for which ambient air quality standards (AAQS) have been established are ozone (O₃), carbon monoxide (CO), coarse inhalable particulate matter (PM₁₀), fine inhalable particulate matter (PM_{2.5}), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead (Pb). Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The South Coast Air Basin (SoCAB), which is managed by the South Coast AQMD, is designated nonattainment for O₃, and PM_{2.5} under the California and National AAQS, nonattainment for PM₁₀ under the California AAQS, and nonattainment for lead (Los Angeles County only) under the National AAQS (CARB 2026).

Furthermore, the South Coast AQMD has identified regional thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including VOC, CO, NO_x, SO_x, PM₁₀, and PM_{2.5}. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation.

3. ENVIRONMENTAL EVALUATION

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☒	☐	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

DISCUSSION

a) *Would the proposed project conflict with or obstruct implementation of the applicable air quality plan?*

The South Coast AQMD adopted the 2022 Air Quality Management Plan (AQMP) on December 2, 2022. Regional growth projections are used by South Coast AQMD to forecast future emission levels in the SoCAB. For southern California, these regional growth projections are provided by the Southern California Association of Governments (SCAG) and are partially based on land use designations included in city/county general plans. Typically, only large, regionally significant projects have the potential to affect the regional growth projections. In addition, the consistency analysis is generally only required in connection with the adoption of General Plans, specific plans, and significant projects.

Changes in population, housing, or employment growth projections have the potential to affect SCAGs demographic projections and therefore the assumptions in South Coast AQMD's AQMP. These demographic trends are incorporated into SCAG's 2024-2050 Regional Transportation

3. ENVIRONMENTAL EVALUATION

Plan/Sustainable Communities Strategy (RTP/SCS), Connect SoCal, to determine priority transportation projects and vehicle miles traveled (VMT) in the SCAG region.

As discussed in Section XIV, Population and Housing, the proposed project would not increase student enrollment at the school and the proposed improvements would continue to serve existing students in the District's service boundary. Construction activities associated with the proposed project would result in short-term employment only and would end upon project completion.

Additionally, as demonstrated in Section II (b), the regional emissions that would be generated by the operational phases of the proposed project would be less than the South Coast AQMD emissions thresholds and would therefore not be considered by South Coast AQMD to be a substantial source of air pollutant emissions that would have the potential to affect the attainment designations in the SoCAB. Therefore, the proposed project would not affect the regional emissions inventory or conflict with strategies in the 2022 AQMP. Impacts would be **less than significant**.

b) *Would the proposed project result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?*

The following describes project-related impacts from regional short-term construction activities and regional long-term operation of the proposed project.

Regional Short-Term Construction Impacts

Construction activities would result in the generation of air pollutants. These emissions would primarily be 1) exhaust from off-road diesel-powered construction equipment; 2) dust generated by construction activities; 3) exhaust from on-road vehicles; and 4) off-gassing of volatile organic compounds (VOCs) from paints.

As described in Section 2.3.2, *Project Construction*, project construction would occur between April 2026 to August 2028. Construction of the field improvements would generate criteria air pollutants associated with construction equipment exhaust and fugitive dust from demolition, site preparation, grading, building construction, paving, architectural coating. Activities for the seismic retrofitting/modernizations would also generate emissions from equipment used to demolish, rebuild, and install the improvements to the buildings and from the coatings used to repaint the buildings. This component of the project is primarily limited to work on, in, and around the existing classroom buildings, as described in Section 2.3.1, *Proposed Improvements*. While these classroom buildings are undergoing improvements, students would be relocated to interim portable classroom buildings which would be installed at two locations on the campus. Emissions would also result from equipment and vehicles used to install and remove these interim portable classroom buildings.

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Air pollutant emissions from construction activities on-site would vary daily as construction activity levels change. Construction emissions were estimated using the California Emissions Estimator Model (CalEEMod), Version 2022.1, and are based on the preliminary construction durations provided by the District. Where specific information regarding project-related construction activities was not available, CalEEMod default information was used.

As shown in Table 3, *Maximum Daily Regional Construction Emissions*, maximum daily emissions for VOC, NO_x, CO, SO₂, PM₁₀, and PM_{2.5} from construction-related activities would be less than their respective South Coast AQMD regional significance threshold values. Projects that do not exceed the South Coast AQMD regional significance thresholds would not result in an incremental increase in health impacts in the SoCAB from project-related increases in criteria air pollutants. Therefore, air quality impacts from project-related construction activities would be **less than significant**.

Table 3 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lbs./day) ^{1, 2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Year 2026						
Demolition of Existing Track and Field	2	22	20	<1	1	1
Site Preparation of Field Area	3	31	31	<1	11	5
Grading of Field Area	2	27	23	<1	7	3
Installation of Interim Buildings and Field Improvements Construction Overlap	2	20	22	<1	3	1
Seismic Retrofitting/Modernization Construction and Architectural Coating & Field Improvements Construction, Paving, and Architectural Coating Overlap	60	28	40	<1	3	1
Year 2027						
Seismic Retrofitting/Modernization Construction	1	9	13	<1	1	<1
Year 2028						
Seismic Retrofitting/Modernization Construction and Architectural Coating Overlap	50	9	15	<1	2	1
Removal of Interim Buildings	1	9	8	<1	2	1

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Table 3 Maximum Daily Regional Construction Emissions

Construction Phase	Pollutants (lbs./day) ^{1, 2}					
	VOC	NO _x	CO	SO ₂	PM ₁₀	PM _{2.5}
Impact Analysis						
Maximum Daily Construction Emissions	60	31	40	<1	11	5
South Coast AQMD Regional Significance Threshold	75	100	550	150	150	55
Significant?	No	No	No	No	No	No

Source: CalEEMod Version 2022.1. South Coast AQMD 2023. Highest winter or summer emissions are reported. (See Appendix A)

1 Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186–compliant sweepers.

2 Based on the preliminary information provided by the District. Where specific information regarding proposed project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by South Coast AQMD of construction equipment.

Long-Term Operation-Related Air Quality Impact

Typical long-term air pollutant emissions are generated by area sources (e.g., landscape fuel use, aerosols, architectural coatings, and asphalt pavement), energy use (natural gas), and mobile sources (i.e., on-road vehicles). The proposed project would not generate any new mobile source emissions or require natural gas. The proposed project would not increase school capacity at the campus and no new activities generating new trips would result from the field improvements. The seismic retrofitting/modernizations component of the project would not expand the existing classroom buildings or otherwise change their operational characteristics. The proposed field building would generate a negligible increase in area source emissions. Therefore, operational emissions would not exceed the South Coast AQMD regional operational emissions thresholds. Therefore, the proposed impacts to the regional air quality associated with operation of the proposed project would be **less than significant**.

c) *Would the proposed project expose sensitive receptors to substantial pollutant concentrations?*

The proposed project could expose sensitive receptors to elevated pollutant concentrations if it causes or significantly contributes to elevated pollutant concentration levels. Unlike regional emissions, localized emissions are typically evaluated in terms of air concentration rather than mass so they can be more readily correlated to potential health effects.

3. ENVIRONMENTAL EVALUATION

Localized Construction Impacts

Construction LSTs

South Coast AQMD has developed localized significance thresholds (LSTs) which are based on the California AAQS, the most stringent AAQS, to provide a margin of safety in the protection of public health and welfare. They are designated to protect sensitive receptors most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and people engaged in strenuous work or exercise. The screening-level construction LSTs are based on the size of the project site, distance to the nearest sensitive receptor, and Source Receptor Area (SRA). The nearest offsite sensitive receptors to field improvements portion of the project are the residences on Nutwood Avenue adjacent to the southern border of the project site and students at La Vista High School, adjacent to the eastern border of the project site. Residences adjacent to the western border of the project site along Glenwood Avenue and Union Avenue would be the closest receptors to the interim portable classroom buildings in the campus's southwest parking lot. Additionally, residences on Fern Avenue, approximately 100 feet west of the project site, would be closest to the buildings undergoing seismic retrofitting and modernization. Onsite receptors would be students and employees of TRHS.

Air pollutant emissions generated by construction activities would cause temporary increases in air pollutant concentrations. Table 4, *Construction Emissions Compared to Screening-Level LSTs*, shows the maximum daily construction emissions (pounds per day) generated during on-site construction activities compared with the South Coast AQMD's screening-level LSTs for sensitive receptors within 82 feet (25 meters), the closest and most conservative distance available, for NO_x, CO, PM₁₀ and PM_{2.5}. As shown in Table 4, construction activities during the site preparation activity of the field improvements phase would generate on-site emissions that exceed the screening-level LSTs for PM₁₀ and PM_{2.5}. Thus, project-related construction activities could have the potential to expose sensitive receptors to substantial pollutant concentrations. Localized air quality impacts from construction activities would be potentially significant.

Table 4 Construction Emissions Compared to Screening-Level LSTs

	Pollutants(lbs./day) ¹			
	NO _x	CO	PM ₁₀ ²	PM _{2.5} ²
Seismic Retrofitting/Modernization Construction (2027)	9	11	<1	<1
Seismic Retrofitting/Modernization Construction and Architectural Coating Overlap (2028)	8	11	<1	<1
Removal of Interim Buildings (2028)	3	3	<1	<1
≤1.00-acre Disturbed Per Day	103	522	4	3

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Table 4 Construction Emissions Compared to Screening-Level LSTs

Exceeds Screening-Level LST?	No	No	No	No
Demolition of Existing Track and Field (2026)	21	19	1	1
1.00-acre Disturbed Per Day	103	522	4	3
Exceeds Screening-Level LST?	No	No	No	No
Installation of Interim Buildings and Field Improvements Construction Overlap (2026)	13	16	1	<1
1.31-acre Disturbed Per Day	117	597	5	3
Exceeds Screening-Level LST?	No	No	No	No
Seismic Retrofitting/Modernization Construction and Architectural Coating & Field Improvements Construction, Paving, and Architectural Coating Overlap (2026)	26	34	2	1
2.19-acre Disturbed Per Day	152	796	6	4
Exceeds Screening-Level LST?	No	No	No	No
Grading of Field Area (2026)	15	17	4	2
2.5-acre Disturbed Per Day	159	854	7	4
Exceeds Screening-Level LST?	No	No	No	No
Site Preparation of Field Area (2026)	29	29	10	5
3.5-acre Disturbed Per Day	184	1,037	9	5
Exceeds Screening-Level LST?	No	No	Yes	Yes

Source: CalEEMod Version 2022.1 and South Coast AQMD 2008 and 2011.

Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment occurring on the project area are included in the analysis.

1 Based on information provided or verified by the District. Where specific information regarding project-related construction activities or processes was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the South Coast AQMD.

2 Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 25 miles per hour on unpaved surfaces, and street sweeping with Rule 1186-compliant sweepers.

3 Screening-level LSTs are based on sensitive receptors within 82 feet (25 meters) for NOX, CO, PM10 and PM2.5 in SRA 16.

Construction activities associated with the proposed project could expose sensitive receptors to elevated concentrations of PM₁₀ and PM_{2.5}. Mitigation Measure AIR-1 would require watering of disturbed areas during the field improvement activities beyond what is required with under South Coast AQMD Rule 403. As shown in Table 5, *Site Preparation Emissions with Mitigation Compared to Screening-Level LSTs*, fugitive dust emissions during site preparation activities

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associated with the field improvements construction with the enhanced water regime would be **less than significant mitigation incorporated**.

Mitigation Measure AIR-1: The Fullerton Joint Union High School District (District) shall require that construction bids for the proposed project include a requirement that construction contractors are required to water disturbed areas a minimum of three times per day to reduce fugitive dust. This measure shall be incorporated into all appropriate construction documents (e.g., construction management plans) submitted to Division of the State Architect (DSA). The District shall verify that construction contractors adhere to South Coast AQMD Rule 403 and implement this enhanced fugitive dust control requirement during grading and other ground disturbing activities.

Table 5 Site Preparation Emissions with Mitigation Compared to Screening-Level LSTs

	Pollutants(lbs./day) ¹			
	NO _x	CO	PM ₁₀ ²	PM _{2.5} ²
Site Preparation of Field Area (2026)	29	29	7	4
3.5-acre Disturbed Per Day	184	1,037	9	5
Exceeds Screening-Level LST?	No	No	No	No

Source: CalEEMod Version 2022.1 and South Coast AQMD 2008a and 2011.

Notes: In accordance with South Coast AQMD methodology, only onsite stationary sources and mobile equipment occurring on the project area are included in the analysis.

1 Based on information provided or verified by the District. Where specific information regarding project-related construction activities or processes was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by the South Coast AQMD.

2 Includes implementation of fugitive dust control measures required by South Coast AQMD under Rule 403, including reducing speed limit to 25 miles per hour on unpaved surfaces and street sweeping with Rule 1186–compliant sweepers, in addition to Mitigation Measure AIR-1 which requires watering disturbed areas a minimum of three times per day.

3 Screening-level LSTs are based on sensitive receptors within 82 feet (25 meters) for NO_x, CO, PM₁₀ and PM_{2.5} in SRA 16.

Construction Health Risk

The proposed project would elevate concentrations of TACs (i.e., diesel particulate matter [DPM]) in the vicinity of sensitive land uses during temporary construction activities that would use offroad equipment operating on-site, and at different levels depending on the type of activity. As described previously, the nearest offsite sensitive receptors would be single-family residences adjacent to the southern and western boundaries of the project site and La Vista High School adjacent to the project’s eastern boundary. In addition, Acacia Elementary School is

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approximately 850 feet northwest of the project site and California State University Fullerton is approximately 415 feet east of the project site. During construction activities, TRHS would continue operations at buildings not undergoing the seismic retrofitting and modernizations and at interim portable buildings at the southwest parking lot and blacktop.

A site-specific construction health risk assessment (HRA) of TACs was prepared to quantify potential health risk emissions during construction (see Appendix A). The results of the analysis are shown in Table 6, *Construction Risk Summary*, and demonstrate that construction activities associated with the proposed project would not exceed the South Coast AQMD thresholds at any of the locations of the maximum exposed receptors in the project area.

Table 6 Construction Risk Summary

Receptor ¹	Cancer Risk (per million)	Chronic Hazards
Residential MER	4.95	<0.1
Elementary School MER – Acacia Elementary School	0.04	<0.1
High School MER – TRHS ²	1.20	<0.1
Worker/University MER – California State University Fullerton	0.02	<0.1
South Coast AQMD Threshold	10	1.0
Exceeds Threshold?	No	No

Source: Appendix A; prepared in accordance with guidance from the Office of Environmental Health and Hazard Assessment (2015).

Notes: MER = Maximally Exposed Receptor

1. Each MER receptor type was based on overall MER location, representing the point of maximum exposure from all source group areas, and was used for the AERMOD results and HRA.
2. Receptors at the interim portable classroom buildings and other onsite locations at TRHS were evaluated in a separate model that excluded the locations of these buildings as part of the onsite emission source in order to evaluate these buildings as receptors. Conservatively, emissions associated with the installation and removal of the interim portable classrooms are incorporated into the risk results for this receptor even though these receptors would not experience be exposed to emissions from these activities.

The results of the HRA are based on the maximum receptor concentration over an approximately 1.75-year construction exposure duration for receptors.

- Cancer risk for the Residential MER, single-family residence adjacent to southern boundary of the project site, from construction activities related to the proposed project were calculated to be approximately 5 in a million, which would not exceed the 10 in a million-significance threshold.

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- Cancer risk for the Elementary School MER, Acacia Elementary School, from construction activities related to the proposed project were calculated to be less than 1 in a million, which would not exceed the 10 in a million-significance threshold.
- Cancer risk for the MER at TRHS from construction activities would be 1.2 in a million and would not exceed the 10 in a million-significance threshold.
- Cancer risk for the Worker/University MER, California State University Fullerton, from construction activities would be less than 1 in a million and would not exceed the 10 in a million-significance threshold.
- For non-carcinogenic effects, the chronic hazard index identified for each toxicological endpoint totaled less than one for all the off-site sensitive receptors. Therefore, chronic non-carcinogenic hazards are less than significant.

As shown in Table 6, construction-related activities associated with the proposed project would not result in an exceedance of the South Coast AQMD health risk thresholds. Therefore, the proposed project would not expose nearby receptors to substantial concentrations of air pollutant emissions during construction. This impact would be **less than significant**.

Localized Operational Impacts

Operation LSTs

Because the installation and use of stationary source equipment is not proposed as part of the project, operation of the proposed project would not generate substantial emissions from onsite stationary sources. Land uses that have the potential to generate substantial stationary sources of emissions include industrial land uses, such as chemical processing and warehousing operations where truck idling would occur onsite and would require a permit from South Coast AQMD. The proposed project would retrofit and modernize existing school buildings and construct athletic field improvements, which are uses that do not fall within this category of uses. Localized air quality impacts related to operation-related emissions would be **less than significant**.

Carbon Monoxide Hotspots

Areas of vehicle congestion have the potential to create pockets of CO called hotspots. These pockets have the potential to exceed the state one-hour standard of 20 ppm or the eight-hour standard of 9 ppm. Because CO is produced in greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to ambient air quality standards is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue

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for longer periods and are subject to reduced speeds. The SoCAB has been designated in attainment under both the national and California AAQS for CO. The proposed project would not result in an increase of trips to the project site and would therefore have no impact on CO Hotspots. Impacts would be **less than significant**

d) *Would the proposed project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The proposed project would not result in objectionable odors. The threshold for odor is if a project creates an odor nuisance pursuant to South Coast AQMD Rule 402, Nuisance, which states:

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property. The provisions of this rule shall not apply to odors emanating from agricultural operations necessary for the growing of crops or the raising of fowl or animals.

The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities.

The improvements associated with the proposed project would not fall within the aforementioned land uses and no operational odors are anticipated. Emissions from construction equipment, such as diesel exhaust and from VOCs associated with architectural coatings and paving activities, may generate odors. However, these odors would be temporary, intermittent, and are not expected to affect a substantial number of people. In addition, land uses accommodated under the proposed project would be subject to South Coast AQMD Rule 402, which would contribute to minimizing odor-related nuisances. Therefore, odor impacts would be **less than significant**.

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IV. Biological Resources

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☒	☐	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

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DISCUSSION

- a) ***Would the proposed project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?***

Special status species include those listed as endangered or threatened under the federal Endangered Species Act or California Endangered Species Act; species otherwise given certain designations by the California Department of Fish and Wildlife; and plant species listed as rare by the California Native Plant Society.

The project site has been previously disturbed by the development of the existing TRHS campus. As identified by Exhibit 25 of the Fullerton General Plan, the project site is not within an open space/habitat conservation area (Fullerton 2020). Orange County, including the project site, is within the OCTA; however, the City is not a participant in the OCTA Habitat Conservation Plan/ Natural Community Conservation Plan (HCP/NCCP) (CDFW 2025a). The closest critical habitat for threatened and endangered species is approximately 0.65 miles northwest of the project site (USFWS 2025a). Based on the BIOS6 mapper the project site is not within an Orange County reserve, or habitat core area (CDFW 2025b). No existing trees would be removed as part of the proposed project. The project site is already disturbed, developed and surrounded by urban development; the proposed project would not impact any candidate, sensitive, or special status species. A **less than significant** impact would occur.

- b) ***Would the proposed project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?***

Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies; that are known to provide habitat for sensitive animal or plant species; or are known to be important wildlife corridors. Although the project site is within the OCTA HCP/NCCP, the City is not a participant of the OCTA HCP/NCCP (CSFW 2025a). No federally designated critical habitat exist on site or in the vicinity of the project site (USFWS 2025a). As discussed in Section IV(a), project site is not within an open space/habitat conservation area as identified by the Fullerton General Plan (Fullerton 2020a). The National Wetlands Mapper maintained by the US Fish and Wildlife service identified a riverine habitat and a forested/shrub wetland along the Fullerton Creek approximately 0.25 miles northwest of the project site (USFWS 2025b). The project site does not contain any riparian habitat onsite and would not impact the Fullerton Creek riverine habitat. Therefore, **no impact** to riparian or other sensitive natural communities would occur.

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- c) ***Would the proposed project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?***

The project site is developed with the existing TRHS academic related buildings, parking lot, and athletic fields. As discussed in Section IV(b), the National Wetlands Mapper identified a riverine habitat and a forested/shrub wetland along the Fullerton Creek approximately 0.25 miles northwest of the project site. No wetlands exist within the project site, and all construction related activities would occur within the boundaries of the project site (USFWS 2025b). Therefore, the proposed project would not have a substantial adverse effect on protected wetlands, and **no impact** would occur.

- d) ***Would the proposed project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?***

Based on the CDFW BIOS6 data viewer, the project site is not within a California essential habitat connectivity areas, interstate connections, natural landscape blocks, natural areas small, core reserves and corridors, connectivity cores, or vegetation nature reserves (CDFW 2025b). The project site is terrestrial connectivity rank 1, Limited Connectivity Opportunity, the lowest connectivity rank. No federally designated critical habitat exists on the project site or in the vicinity of the project site (USFWS 2025a).

The project site is in an urbanized area within the City of Fullerton and is surrounded by religious institutions, parks, residential, commercial, and educational uses. The project site developed with the existing TRHS academic related buildings, parking lot, and athletic fields. No existing trees would be removed as part of the project. However trees within the project site and surrounding area can be impacted by construction activities, and the project would include vegetation clearing of shrubs and low-laying grasses on site.

Although unlikely, due to the developed nature of the site and limited vegetation for migratory species, migratory birds may be present on-site and implementation of Mitigation Measure BIO-1 (MM BIO-1) would be required. MM BIO-1 states that in order to minimize impacts, vegetation clearing or ground-disturbing activities should be conducted during the non-breeding season (September 1 to February 14) to limit impacts to nesting birds. If vegetation clearing or ground-disturbing activities need to take place during breeding season (February 15 through August 31), a preconstruction nesting bird survey(s) will be required to remain in compliance with the Migratory Bird Treaty Act (MBTA). The last survey should be conducted no more than three days prior to the start of work. Compliance with the MBTA, CDFW regulations, and implementation of Mitigation Measure BIO-1 (MM BIO-1) would ensure that impacts associated with the implementation of the proposed project are **less than significant with mitigation incorporated** to nesting and migratory birds.

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Mitigation Measure BIO-1: Preconstruction Avian Survey. To the extent feasible, in order to minimize potential impacts to avian species, vegetation clearing or ground-disturbing activities should be conducted during the non-breeding season (September 1 to February 14) to limit impacts to nesting birds. If vegetation clearing or ground-disturbing activities need to take place during breeding season (February 15 through August 31), a pre-construction avian survey(s) will be required. The last survey should be conducted a minimum of three days prior to the start of work. The District shall hire a qualified biologist to prepare the preconstruction avian survey.

If any bird listed under the Migratory Bird Treaty Act is found to be nesting within the project site or within the area of vegetation or ground disturbing activities, an adequate protective buffer zone shall be established by a qualified biologist to protect the nesting site. The distance shall be determined by a qualified biologist based on the site conditions (e.g., topography, if the nest is in a line of sight of the construction, and the sensitivity of the birds nesting). Additional protective measures shall include establishment of clearly delineated exclusion zones (i.e., demarcated by identifiable fencing, such as orange construction fencing or equivalent) around each nest location as determined by a qualified biologist, taking into account the species of birds nesting, their tolerance for disturbance, and proximity to existing development. The nest site(s) shall be monitored by a qualified biologist periodically to see if the birds are stressed by the construction activities and if the protective buffer needs to be increased. Once the young have fledged and are flying well enough to avoid project construction zones (typically by August), the project can proceed without further regard to the nest site(s).

e) *Would the proposed project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Sensitive natural communities are natural communities that are considered rare in the region by regulatory agencies; that are known to provide habitat for sensitive animal or plant species; or are known to be important wildlife corridors.

The Fullerton General Plan includes policies to protect sensitive natural resources, conservation areas, sensitive areas, waterways, and tree and wildlife management. However, as discussed in Section IV(a) through (d), the project site contains no biological resources, conservation areas, critical habitats, riparian habitat, wetland habitat, HCP/NCCP, wildlife connectivity link, and tress on site. The closest critical habitat for threatened and endangered species is approximately 0.65 miles northwest of the project site (USFWS 2025a). In addition, the project site has been previously disturbed by the development of the existing campus. Therefore, none of the local policies apply to the proposed project and **no impact** would occur.

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- f) ***Would the proposed project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?***

Orange County, including the project site, is within the OCTA; however, the City is not a participant of the OCTA HCP/NCCP (CDFW 2025a). The project site is not within any other HCP/NCCP or other approved local, regional, or state habitat conservation plan. Therefore, **no impact** would occur.

V. Cultural Resources

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☐	☒	☐

DISCUSSION

- a) ***Would the proposed project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?***

Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally a resource is considered “historically significant” if it meets one of the following criteria:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
2. Is associated with the lives of persons important in our past;

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3. Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;
4. Has yielded, or may be likely to yield, information important in prehistory or history.

CRM TECH prepared a cultural evaluation report evaluating the campus and proposed project for eligibility for listing in the California Register of Historical Resources (CRHR), and as historical resources under CEQA following established guidelines (see Appendix B). HANA Resources conducted a historical/archaeological records search, pursued historical background research, consulted with local community representatives, and carried out a field inspection of the campus.

TRHS was originally constructed in 1964 with further expansion and improvements through 1972. Additional rounds of construction and improvements continued throughout the modern era. According to South Central Coastal Information Center (SCCIC) records, the Troy High School campus had not been surveyed systematically for cultural resources prior to this study, and no cultural resources had been recorded within or adjacent to its boundaries. SCCIC identified 32 studies on various tracks of land and recognized ten cultural resources; however, none of these sites are located in the immediate vicinity of the project site and would not be affected by the proposed project due to their distance.

TRHS is not listed in the California Register of Historical Resources, formally determined eligible for such listing, or designated in an officially established local register, it does not meet the definition of a “historical resource” in the “mandatory” or “presumptive” category. The school’s history reflects typical educational activities and community involvement, no specific events of distinctive significance have been identified in association with the school that would elevate its historical importance, thus TRHS does not meet California Register Criterion 1. The historical background research did not identified any persons of recognized significance in national, state, regional, or local history in close association with TRHS, thus TRHS does not meet California Register Criterion 2. The architecture of the 1960s academic related buildings on campus demonstrates the basic characteristics of Mid-Century Modernism. However, the campus and its buildings do not stand out as an important example of the Mid-Century Modernist movement in architecture, nor do they exhibit a particularly high level of artistic value or any other distinctive merits to distinguish them from the numerous similar school campuses of similar age in southern California. Although William E. Blurock qualifies as a master architect, TRHS is a relatively common design for post-World War II educational institutes and other office buildings and is not recognized as an important. Thus, TRHS does not meet California Register Criterion 3. The campus is a common late-historic-period to modern-era facility and is unlikely to yield information important to the study of educational or local history; thus, TRHS does not meet California Register Criterion 4. Therefore, it does not qualify as a “historical resource” for CEQA-

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compliance purposes. Pursuant to PRC §21084.1, the cultural evaluation report concluded the proposed project would not constitute a substantial adverse change in the significance of a historical resource. Therefore, **no impact** would occur.

b) *Would the proposed project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?*

Implementation of the proposed project would result in limited ground disturbance to provide improvements to the athletic fields, including field lighting and a new restroom and storage building at the existing TRHS. Implementation of the proposed project would require limited earthwork which include grading for proper base and slope for the restroom and storage building, bleacher, and track and field; drill holes for installation of proposed light poles, support beams for the steel wire rope netting, and utility trenching. The earthwork activities associated with the proposed project would generally be surface level since no subterranean levels are proposed, which typically requires extensive excavation. Additionally, the project site has been previously disturbed since it is currently developed with existing academic related buildings, a parking lot, athletic fields, paved walkways, and landscaped areas.

The cultural evaluation report determined the project site's location appears to be low in sensitivity for any cultural resources that predate the construction of TRHS in the mid-1960s (Appendix B). From the early 1890s through the turn of the 20th century, human-made features noted on the landscape nearby included grids of roads, the Atchison, Topeka and Santa Fe Railway, and scattered buildings, most of them presumably farmsteads. Between then and the 1930s, the project site and surrounding area included citrus groves until the suburban residential development was evident by the early 1960s, and the development of the TRHS campus in 1964. As discussed in Section V(a), SCCIC identified 32 studies on various tracks of land and recognized ten cultural resources. Among these known cultural resources were eight buildings constructed between 1886 and 1965, the other two sites consisted of a concrete structural foundation and the Burlington Northern Santa Fe (formerly Atchison, Topeka and Santa Fe) Railway. None of these sites was located in the immediate vicinity of the project area, and would not be affected by the proposed project due to their distance. In addition, the City of Fullerton's General Plan does not identify or discuss archaeological resources within the City.

Although there are no known historical resources within the project site, unknown archaeological cultural materials have the potential to exist. Ground-disturbing activities from the proposed project may uncover unknown archaeological resources. Implementation of Mitigation Measure CUL-1 would ensure that, in the event archaeological resources are discovered during ground-disturbing activities, archaeological resources would be recovered in accordance with state and federal requirements. Additionally, as part of the Historical/Archaeological Resources Survey Report, the Native American Heritage Commission (NAHC) Sacred Lands File (SLF) was searched and yielded a positive result, which indicates that known sacred sites or tribal cultural resources (TCR) exist within the vicinity of the project site

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(Appendix E). Thus, the potential for unearthing TCRs exists. Implementation of Mitigation Measure CUL-1 (see Section V) would ensure applicable Native American tribal contract(s) are contacted in the events significant Native American cultural resources are discovered. Implementation of Mitigation Measures CUL-1 and TCR-1 would reduce impacts to archaeological resources to **less than significant with mitigation incorporated**.

Mitigation Measure CUL-1: Prior to initiating any ground-disturbing activities for the proposed project, the District shall ensure that an archaeologist who meets the Secretary of the Interior's standards for professional archaeology has been retained for the project and will be on-call during all grading and other significant ground-disturbing activities. The qualified archaeologist shall ensure that the following measures are followed for the project:

- Prior to any ground disturbance, the qualified archaeologist shall provide worker environmental awareness protection training to construction personnel regarding regulatory requirements for the protection of cultural resources (prehistoric and historic). As part of this training, construction personnel shall be briefed on proper procedures to follow should unanticipated cultural resources be discovered during construction.
- In the event that unanticipated cultural material is encountered during any phase of project construction, all construction work within 100 feet of the find shall cease and the qualified archaeologist shall assess the find for importance. Construction activities may continue in other areas. If the discovery is determined to not be important by the qualified archaeologist, work will be permitted to continue in the area.
- If a find is determined to be important by the qualified archaeologist, he or she shall immediately notify the District. The qualified archaeologist shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the California Register of Historical Resources (CRHR). Work may not resume within the no-work radius until the qualified archaeologist and District, through consultation as appropriate, determine that the site either: (1) is not eligible for the CRHR; or (2) that the treatment measures have been completed to their satisfaction.
- If significant Native American cultural resources are discovered, the archaeologist on call shall contact the applicable Native American tribal contact(s). If requested by the Native American tribe(s), District, or archaeologist on call shall, in good faith, consult

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on the discovery and its disposition (e.g., avoidance, preservation, reburial, return of artifacts to tribe).

c) *Would the proposed project disturb any human remains, including those interred outside of dedicated cemeteries?*

A significant impact would occur if the proposed project would disturb previously interred human remains. Given the project site was previously disturbed, it is unlikely to support conditions conducive to the discovery of human remains. However, there is a remote possibility that human remains could be encountered during excavation and grading activities associated with the proposed project.

If human remains are encountered during ground-disturbing activities, California Health and Safety Code Section 7050.5 requires that disturbance of the site would halt and remain halted. The county coroner would investigate the circumstances, manner, and cause of any death and recommend the treatment and disposition of the human remains to the person responsible for the excavation or to his or her authorized representative, in the manner provided in Section 5097.98 of the California Public Resources Code. The coroner is required to make a determination within two working days of being notified of the discovery of the human remains. If the coroner determines that the remains are not subject to his or her authority or has reason to believe they are Native American, he or she would contact, by telephone within 24 hours, the NAHC, who will contact the “most likely descendant.” The most likely descendant would receive access to the discovery and will provide recommendations or preferences for treatment of the remains within 48 hours of accessing the discovery site. Disposition of human remains and any associated grave goods, if encountered, would be treated in accordance with procedures and requirements in Sections 5097.94 and 5097.98 of the Public Resources Code; Section 7050.5 of the California Health and Safety Code; and CEQA Guidelines Section 15064.5.

While unlikely, any accidental discovery of human remains during project construction and operation would be required to comply with all applicable laws and regulations establishing the proper handling of human remains. Compliance with these laws and regulations would ensure that proposed project would result in a **less than significant** impact.

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VI. Energy

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

DISCUSSION

- a) *Would the proposed project result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?*

The following discusses the potential energy demands from short-term construction and long-term operational energy consumption associated with the proposed project.

Short-Term Construction Impacts

Electrical Energy

Electricity use during construction of the proposed project would vary during different phases of construction. Construction of the proposed project would not require electricity to power most construction equipment. Later construction phases could result in the use of electricity-powered equipment for interior construction and architectural coatings. It is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws) and lighting, which would result in minimal electricity usage during construction activities. Therefore, project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be **less than significant**.

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Natural Gas Energy

It is not anticipated that construction equipment used for the proposed project would be powered by natural gas, and no natural gas demand is anticipated during construction. Therefore, **no impacts** would occur with respect to natural gas usage during construction.

Transportation Energy

Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction employee vehicles. In addition, transportation energy demand would come from the use of off-road construction equipment. It is anticipated that the majority of off-road construction equipment, such as those used during demolition, grading, and building construction/modernizations, would be gas or diesel powered.

The use of energy resources by vehicles and equipment would fluctuate according to the phase of construction and would be temporary. In addition, all construction equipment would cease operating upon completion of proposed project construction. Thus, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure.

Moreover, to limit wasteful and unnecessary energy consumption, the construction contractors are anticipated to minimize nonessential idling of construction equipment during construction, in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. Construction trips would also not result in unnecessary use of energy since the project site is centrally located in an urbanized and residential area of the city served by numerous regional freeway systems (e.g., State Routes 57 and 91) that provide the most direct routes from various areas of the region. Thus, energy use during construction of the proposed project would not be considered inefficient, wasteful, or unnecessary. Impacts would be **less than significant**.

Long-Term Impacts During Operation

No increase in long-term energy use would occur as a result of the seismic retrofits/modernizations component of the proposed project since these improvements would not expand or otherwise change the operational characteristics of the buildings with respect to energy use. Additionally, neither the seismic retrofits/modernizations nor field improvements components of the project would generate new trips to the project site, but instead result in a redistribution of existing trips, as described in Section XVII, *Transportation*.

Operations associated with the field improvements would generate a nominal increase in demand for electricity on the project site, including for the field building and new field lighting. No natural gas would be used for operation of the field improvements. The net increase in

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electricity consumption from the proposed project is shown in Table 7, *Operation-Related Electricity Consumption*.

Table 7 Operation-Related Electricity Consumption

Land Use ¹	Electricity (kWh/year) ¹
Field Building ¹	21,067
Field Lighting ²	51,801
Total	72,868

Source: CalEEMod Version 2022.1, Appendix A.

Notes: kWh = kilowatt-hours

¹ Based on CalEEMod defaults and a conversion of default natural gas use to electricity using a conversion rate of 3,412 British Thermal Units for one kWh.

² Based on the durations of events that would be rescheduled in order to use the proposed field lighting and the total kW load for all field lighting, as provided in the Musco Lighting Plans (see Figures 8 and 9)

While the proposed project would generate new energy demand at the site, it would still be required to comply with the latest Building Energy Efficiency Standards and CALGreen standards. In addition to compliance with these energy efficiency standards, impacts associated with electricity use would decrease over time as the project's electricity provider, Southern California Edison (SCE), is required to comply with the state's renewable portfolios standard (RPS). This program mandates utilities to procure a certain proportion of electricity from eligible renewable and carbon-free sources and increasing the proportion through the coming years with an ultimate procurement requirement of 100 percent by 2045. The RPS requirements would support use of electricity by the proposed project that is generated from renewable or carbon-free sources. Overall, the proposed project would generally be consistent with the goals outlined in Appendix F of the CEQA Guidelines regarding increasing energy efficiency, decreasing reliance on fossil fuels, and increasing renewable energy sources.

The proposed project would be consistent with the requirements of these energy-related regulations, which would decrease electricity use and increase renewable electricity, and would not result in wasteful or unnecessary electricity demands. Therefore, the proposed project would have **less than significant impacts** with respect to energy consumption.

b) Would the proposed project conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

This impact analysis evaluates consistency of the proposed project with California's RPS Program, which is California's primary plan driving the transition of the state's electricity grid to renewable energy. Eligible renewable sources under the RPS include wind, small hydropower, solar, geothermal, biomass, and biogas. The RPS goals have been updated since adoption of SB 1078 in 2002. In general, California has RPS requirements of 33 percent renewable energy by

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2020 (SB X1-2), 40 percent by 2024 (SB 350), 50 percent by 2026 (SB 100), 60 percent by 2030 (SB 100), 90 percent by 2035 (SB 1020), and 100 percent carbon free by 2045 (SB 100 and SB 1020).

The statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers such as SCE, whose compliance with RPS requirements would contribute to the state objective of transitioning to renewable energy. As previously stated, the proposed project would be required to comply with the current Building Energy Efficiency Standards to ensure that electricity use associated with the field improvements would be minimized. Therefore, implementation of the proposed project would not conflict with or obstruct implementation of California's RPS program or other plans or policies adopted for renewable energy and energy efficiency. Impacts would be **less than significant**.

VII. Geology and Soils

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☐	☒
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐

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Issues	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☒	☐	☐

DISCUSSION

- a) *Would the proposed project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map, issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.
 - ii) Strong seismic ground shaking?
 - iii) Seismic-related ground failure, including liquefaction?
 - iv) Landslides?

Fault Rupture

Alquist-Priolo Earthquake Fault Zones are regulatory zones surrounding the surface traces of active faults in California that have ruptured in the last 11,000 years (DOC 2025c). An active

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fault has the potential for surface rupture, and a structure for human occupancy cannot be placed over the fault but must be a minimum distance from the fault (generally 50 feet).

Based on the California Geological Survey's Earthquake Zones of Required Investigation mapper, there are no Alquist-Priolo Earthquake Fault Zones on or near the project site (DOC 2025d). The nearest Alquist-Priolo Earthquake Fault Zones are the faults in West Coyote Hills, and the Whittier Fault Zone approximately 4.2 miles west, and 4.2 miles north, respectively. No active faults, trace faults or any other faults traverse through or encroach on the boundaries of the project site (DOC 2025d, 2025e). Since no active faults or any other fault exist on site, surface rupture would not occur. **No impact** would occur.

Seismic Ground Shaking

As discussed above, the project site is not located within an established Alquist-Priolo Earthquake Fault Zone. However, the project site, like all areas in Southern California, is subject to ground movement associated with earthquakes along the active faults. The degree of ground shaking, and earthquake-induced damage is dependent on multiple factors, such as distances to causative faults, earthquake magnitudes, and expected ground accelerations. The proposed project would be required to comply with the seismic design parameters of the CBC, which regulates all building and construction projects and implements a minimum standard for building design and construction that includes specific requirements for seismic safety and evacuation. Compliance with the CBC would ensure impact related to seismic shaking would be **less than significant**.

Liquefaction

Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based upon three main contributing factors:

- Cohesionless, granular soils having relatively low densities (usually of Holocene age).
- Shallow groundwater (generally less than 50 feet).
- Moderate to high seismic ground shaking.

Cohesionless and granular soils are sand or gravel, typically with little or no clay content. Soil liquefaction generally occurs in submerged granular soils and non-plastic silts during or after strong ground shaking. As identified by the Fullerton Safety Element Supplement Exhibit 3, the project site is not subject to liquefaction. The nearest liquefaction zone is approximately 0.4 miles northeast of the project site (DOC 2025d). Since no areas of liquefaction exist on site, liquefaction would not occur. **No impact** would occur.

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Landslides

According to the US Land Slide Inventory and Susceptibility Mapper, the project site is considered an area of very low landslide potential (USGS 2025a). The nearest landslide zone is approximately 0.35 miles north of the project site, along the edge of the Fullerton Creek (DOC 2025d). Additionally, the proposed project would be designed and constructed consistent with CBC, which would ensure that impacts related to landslides are **less than significant**.

b) *Would the proposed project result in substantial soil erosion or the loss of topsoil?*

Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved and removed from one place and transported to another. The project site contains relatively flat terrain or is already developed, which decreases the project's potential to accelerate erosion. The project site is developed with existing academic-related buildings, athletic fields, a parking lot, and associated structures.

Implementation of the proposed project would require limited earthwork which include grading for proper base and slope for the restroom and storage building, bleacher, and track and field; drill holes for installation of proposed light poles, support beams for the steel wire rope netting, and utility trenching. Additionally, the proposed project does not contain any subterranean levels and would not require extensive excavation, which could expose more soils to erosion. In addition, because the project site encompasses an area of more than one acre, the proposed project would be subject to the National Pollutant Discharge Elimination System (NPDES) permit requirements. These include the preparation of a Storm Water Pollution Prevention Plan (SWPPP) and Monitoring Program. The SWPPP for the proposed project would describe minimum and advanced construction best practices for erosion control at the site. Additionally, adherence with existing state and local laws regulating construction activities would minimize soil erosion. At project completion, the project site would be developed with academic-related buildings, a restroom and storage building, athletic facilities, walkways and other paved areas, and landscaping; thus, soil on-site would not be susceptible to substantial erosion. Therefore, the proposed project would not result in a substantial soil erosion or loss of topsoil, and a **less than significant** impact would occur.

c) *Would the proposed project be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?*

The project site is primarily flat and, as discussed above Section VII(a), the project site is not within an area subject to landslides or liquefaction and adherence with the CBC would ensure that impacts would be less than significant.

Lateral spreading is a type of liquefaction-induced ground failure associated with the lateral displacement of surficial blocks of sediment resulting from liquefaction in a subsurface layer (Caltrans 2020). Due to the project site not being in an identified liquefaction susceptibility

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zone, there is no potential for lateral spreading to occur. In addition, the proposed project would excavate and recompact the upper soils and any loose fill soils within the project site. Due to recompacting of the soil and adherence to CBC policies, seismic settlement or lateral spreading would not occur.

Subsidence occurs when the level of the ground decreases, as if the surface is sinking. Subsidence can either be sudden (as in a sinkhole) or happen gradually over time. It can be caused by mining, groundwater pumping, or fossil fuel extraction, creating empty underground spaces that can collapse and cause the soil above to drop. Erosion, natural cave collapses, and seismic activity can also cause subsidence.

The project site is located within an area of Orange County that has experienced land subsidence due to groundwater pumping (USGS 2025b). However, the proposed project would not involve excessive groundwater withdrawal during construction or operation that could contribute to subsidence. The project would include the installation of a 9,300-cubic-foot infiltration system beneath the synthetic turf field to facilitate recharge of stormwater to the underlying groundwater basin. In addition, the project would be designed and constructed in compliance with CBC and DSA requirements. Therefore, impacts related to land subsidence would be less than significant.

The collapse of soils occurs with (1) an open, partially unstable, partially saturated fabric; (2) sufficient total stress to make the soil structure metastable; (3) the presence of a bonding agent or sufficient soil suction to stabilize the soil in the metastable condition; and (4) the addition of water, which reduces soil suction or softens/destroys the bonding agent, thereby causing shear failures at the inter-aggregate or inter-particle contacts (Caltrans 2024). The project site does not contain shallow ground water in the area with the nearest well approximately 2.3 miles northwest has approximately 70.66 depth to groundwater (CDWR 2025a). Thus, the potential for groundwater to create collapsible soils on-site is not present. The proposed project would be designed and constructed in accordance with the CBC to withstand landslide, liquefaction, lateral spreading, subsidence, liquefaction, or collapse potential. Therefore, this impact is **less than significant**.

d) *Would the proposed project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

Expansive soils contain certain types of clay minerals that shrink when they dry out and swell when soils become wet, resulting in the potential for cracking building foundations and in some cases, structural distress of the buildings themselves.

Based on the web soil survey mapper the underlying soil is comprised entirely of Mocho loam (166) (USDA 2025). Soil Plasticity Index (PI) identifies the soil's ability to change shape, and the

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International Building Code (IBC) states a PI of 15 or greater (IBC Section 1803.5.3) is considered an expansive soil. The majority of the site contains Mocho loam with a PI of 15.7, identifying that expansive soils exist on site. However, the presence of expansive soil is commonly and effectively reduced by various design techniques such as 1) proper design of foundations, slabs, streets, and other improvements subject to the influence of the soils; 2) overexcavation of the expansive soils/bedrock and replacement with less-expansive fill soils; 3) control of surface and subsurface drainages to prevent moisture variations; and 4) combinations of these various techniques (UFC 2004). The project would comply with the seismic design parameters of the CBC ensuring impacts associated with expansive soils are **less than significant**.

- e) ***Would the proposed project have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?***

The proposed project would not require the installation or use of a septic tank or alternative wastewater disposal system. Therefore, **no impact** would occur.

- f) ***Would the proposed project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?***

Paleontological resources or fossils are remains of ancient plants and animals that can provide scientifically significant information about the history of life on earth. This sensitivity is determined by rock type, history of the geologic unit in producing significant fossils, and fossil localities that are recorded from that unit.

Based on a USGS report the San Pedro formation in Coyote Hills contain significant paleontological resources within Fullerton and Buena Park. Fossil localities in East Coyote Hills, approximately 1 mile north of the project site, have been discovered (USGS 2000). Due to the distance from East Coyote Hills, and the developed nature of the site, paleontological resources are not expected to be discovered during project construction; though it is possible that unknown paleontological resources could be discovered during earth work activities. Implementation of Mitigation Measure GEO-1 (MM GEO-1), requiring the contractor to notify a qualified paleontologist to investigate paleontological resources in the event they are uncovered would ensure that impacts associated with paleontological resources would be **less than significant with mitigation incorporated**.

Mitigation Measure GEO-1: In the event that fossils or fossil locality deposits are discovered during construction, excavations within 50-feet of the fossil locality shall be temporarily halted until removal of the fossil localities. The contractor shall notify a qualified paleontologist to investigate its significance. If the fossil locality is determined to be significant by the qualified paleontologist the paleontologist shall work with the District to follow accepted professional standards such as further testing for evaluation or data recovery, as necessary. The paleontologist shall notify the appropriate agencies

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to determine procedures that would be followed before construction is allowed to resume at the location of the find. If the project proponent determines that avoidance is not feasible, the paleontologist shall prepare an excavation plan for mitigating the effect of the project based on the qualities that make the resource important.

VIII. Greenhouse Gas Emissions

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO₂), methane (CH₄), and O₃—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N₂O), sulfur hexafluoride (SF₆), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.¹

Information on manufacture of cement, steel, and other “life cycle” emissions that would occur as a result of the project are not applicable and are not included in the analysis.² Black carbon

- 1 Water vapor (H₂O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.
- 2 Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (CNRA 2018). Because the amount of materials consumed during the operation or construction of the proposed project

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emissions are not included in the GHG analysis because the CARB does not include this short-lived climate pollutant in the state's Senate Bill 32 (SB 32) and Assembly Bill 1279 (AB 1279) inventory but treats it separately.³ A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

DISCUSSION

a) *Would the proposed project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Global climate change is not confined to a particular project area and is generally accepted as the consequence of global industrialization over the last 200 years. A typical project, even a very large one, does not generate enough greenhouse gas emissions on its own to influence global climate change significantly; hence, the issue of global climate change is, by definition, a cumulative environmental impact.

As seen in Table 8, *Project-Related Operation GHG Emissions*, construction and operation of the proposed project would generate 47 metric tons of carbon dioxide equivalent (MTCO₂e) per year. The proposed project would not generate new trips to the project site, resulting in no increase in mobile source emissions. Annual average construction emissions were amortized over 30 years and are included in the emissions inventory to account for one-time GHG emissions from the construction phase of the proposed project. Operational emissions are based on the field improvement component of the project only since the proposed retrofits/modernizations would not change the operational characteristics of the buildings with respect to GHG emissions.

Table 8 Project-Related Operation GHG Emissions

Source	GHG Emissions (MTCO ₂ e/Year)
Area	<1
Energy	5
Water	2
Solid Waste	1
Refrigerants	<1
Field Lighting ¹	8

is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (LCI 2008).

³ Particulate matter emissions, which include black carbon, are analyzed in Section III, Air Quality. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The state's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017).

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Table 8 Project-Related Operation GHG Emissions

Source	GHG Emissions (MTCO ₂ e/Year)
30-Year Amortized Construction Emissions	30
Net Difference	47
South Coast AQMD Bright-Line Threshold	3,000 MTCO₂e/Year
Exceeds Bright-Line Threshold?	No

Source: CalEEMod, Version 2022.1; South Coast AQMD 2008b; Appendix A.

Notes: MTons = metric tons; MTCO₂e = metric ton of carbon dioxide equivalent

1 Emissions from field lighting calculated off-model based on average hours of lighting per event (Appendix A).

As shown in Table 8, construction and operation of the proposed project would not generate an increase of annual emissions that exceed the South Coast AQMD Working Group bright-line threshold of 3,000 MTCO₂e per year (South Coast AQMD 2010). Therefore, the proposed project's cumulative contribution to GHG emissions would be **less than significant**.

b) *Would the proposed project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and the SCAG's RTP/SCS. A consistency analysis with these plans is presented below.

CARB Scoping Plan

CARB's latest Climate Change Scoping Plan (2022) outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32, SB 32, and AB 1279 (CARB 2022). The Scoping Plan is applicable to State agencies and is not directly applicable to cities/counties and individual projects. However, new regulations adopted by the state agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the Low Carbon Fuel Standard (LCFS) and changes in the corporate average fuel economy standards (e.g., California Advanced Clean Cars program).

The proposed project would not use natural gas, consistent with the Scoping Plan's decarbonization goals. The project would also not generate new trips to the project site and as a local-serving K-12 public school, screens out of VMT analysis per the City of Fullerton's Transportation Assessment and Procedures document, as discussed in Section XVII. The proposed project would not add new parking to the project site, which would require compliance with CALGreen electric vehicle charging standards. In addition, the project would comply with statewide measures pertaining to on-road vehicles, off-road equipment, and

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transportation fuels that have been adopted since AB 32, SB 32, and AB 1279 were adopted. Therefore, the proposed project would not obstruct implementation of the 2022 Scoping Plan, and impacts would be less than significant.

SCAG's Regional Transportation Plan/Sustainable Communities Strategy

SCAG adopted the 2024-2050 RTP/SCS, Connect SoCal, in April 2024. Connect SoCal is a long-term plan for Southern California region that details the development, integrated management and operation of transportation systems and facilities that will function as an intermodal transportation network for the SCAG metropolitan planning area (SCAG 2024). This plan outlines a forecasted development pattern that demonstrates how the region can sustainably accommodate needed housing and job centers with multimodal mobility options. The overarching vision is to expand alternatives to driving, advance the transition to clean-transportation technologies, promote integrated and safe transit networks, and foster transit-oriented development in compact and mixed-use developments (SCAG 2024).

In addition, Connect SoCal is supported by a combination of transportation and land use strategies that outline how the region can achieve California's GHG-emission-reduction goals and federal Clean Air Act requirements. The projected regional development, when integrated with the proposed regional transportation network in Connect SoCal, would reduce per-capita GHG emissions related to vehicular travel and achieve the GHG reduction per capita targets for the SCAG region. The Connect SoCal Plan does not require that local general plans, specific plans, or zoning be consistent with the SCS, but provides incentives for consistency to governments and developers.

As discussed in Section XVII, the proposed project is a local-serving K-12 public school that screens out of VMT analysis. VMT impacts are therefore considered less than significant. Additionally, the proposed project would not generate new trips to the project but instead redistribute existing trips to later times of the day to use the field lighting. Furthermore, the proposed project would not change the underlying zoning or uses on the project site and would continue to serve the local student population and neighboring communities. Accordingly, the proposed project would not interfere with SCAG's ability to implement the regional strategies outlined in the SCS, and impacts would be **less than significant**.

IX. Hazards and Hazardous Materials

Would the project:

3. ENVIRONMENTAL EVALUATION

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	☐	☐	☐	☒

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DISCUSSION

- a) ***Would the proposed project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?***

Construction

Construction of the proposed project would require small amounts of hazardous materials such as vehicle fuels, lubricants, grease and transmission fluids, paints, and coatings. The handling, use, transport, and disposal of hazardous materials during the construction phase of the proposed project would comply with existing regulations of several agencies—the US Environmental Protection Agency (EPA), California Division of Occupational Safety and Health (Cal/OSHA), United States Occupational Safety and Health Administration, and United States Department of Transportation.

Operation

Operation of the proposed project would not involve the use of unusually hazardous materials typical of school facilities such as cleaning and maintenance supplies (cleaners, gasoline, paint and pesticides). The proposed project includes retrofitting existing academic related buildings, constructing interim portable classrooms, and improvements to the athletic fields that would use cleaners and other chemicals in relatively small quantities, which are not typically considered hazardous materials that could result in a significant hazard to the public or the environment.

Furthermore, the use, storage, transport, and disposal of hazardous materials during both construction and operational phases would be governed by existing regulations of several agencies, including the EPA, US Department of Transportation, Cal/OSHA, Orange County Health Care Agency, and Environmental Health Division, similar to the construction phase. Compliance with applicable laws and regulations governing the use, storage, transportation, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts.

Therefore, substantial hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials would be **less than significant**.

- b) ***Would the proposed project create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?***

California Government Code Section 65962.5 requires referencing a list of hazardous materials sites, hazardous waste discharges for which the State Water Control Board has issued certain types of orders, public drinking water wells collecting detectable levels of organic contaminants,

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underground storage tanks with reported unauthorized releases, and solid waste disposal facilities from which hazardous waste has migrated.

The project site is currently developed with the existing TRHS academic related buildings, parking lot, and athletic fields. Seven environmental lists were searched for hazardous materials on the project site:

- GeoTracker. State Water Resources Control Board (SWRCB 2025)
- EnviroStor. Department of Toxic Substances Control (DTSC 2025a)
- EnviroStor. Cortese List (DTSC 2025b).
- CalEPA. Cortese List Data Resources. (CalEPA 2025a).
- CalEPA. California EPA. (CalEPA 2025b)
- Solid Waste Information System (SWIS). California Department of Resources Recovery and Recycling (Cal Recycle 2025).
- Well Finder. Geologic Energy Management Division (CalGEM)(DOC 2025f)

The TRHS campus and project site were identified by two hazardous waste databases; see Table 9, *Hazardous Materials Sites On-Site or Within 0.25 mile of the Project Site*. However, two of the identified sites are 1.4 miles southwest of the project site and do not pose any threat of hazardous materials release on-site. In addition, CalEPA identified the campus as a site that stores chemical/hazardous materials on-site. As discussed in Section IX(a), the campus currently and would continue to utilize hazardous materials typical of school facilities such as cleaning and maintenance supplies, which would be stores in accordance with federal, state, and local policies. Therefore, no hazardous material sites of concern exist on the project site or campus.

Table 9 Hazardous Material Sites On-Site or Within 0.25 mile of the Project Site

Location	Database	Identifier	Cleanup Status	Proximity to Site
2200 Dorothy Lane, Fullerton, CA 92831	CalEPA	Chemical Storage Facilities	Open - Hazardous Materials Release Response Plans (2024, and 2013).	On-Site
1150 E Elm Street Fullerton, CA 92631	GeoTracker, CalEPA	Leaking Underground Storage Tank (LUST) Cleanup Site	Completed – Case Closed as of 10/30/1991	Identified: On-Site Present: 1.4 miles southwest
1133/1137 E Elm Street, Fullerton, CA 92631	GeoTracker	LUST Cleanup Site	Completed – Case Closed as of 3/25/1999	Identified: On-Site Present: 1.4 miles southwest

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Table 9 Hazardous Material Sites On-Site or Within 0.25 mile of the Project Site

Location	Database	Identifier	Cleanup Status	Proximity to Site
909 North State College Boulevard, Fullerton CA 92831	EnviroStor, CalEPA	School Investigation	No Further Action	0.1 miles east
800 North State College Boulevard, Fullerton, CA 92634	CalEPA	LUST Cleanup Site, Aboveground Petroleum Storage, Chemical Storage Facilities, Hazardous Waste Generator, RCRA LQ HW Generator, US EPA Air Emission Inventory System (EIS)	Completed – Case Closed as of 5/8/1990	0.24 miles east

Source: CalEPA 2025, SWRCB 2025, DTSC 2025a

The remaining two sites at 909 and 800 north State College Boulevard have a cleanup status of no further action, and completed - case closed, and do not have the potential for accidental release of hazardous materials. As such, there are no hazardous waste sites on-site or in the surrounding area that would create a significant hazard to the public or environment due to upset or accidental release of hazardous material. Therefore, impacts would be **less than significant**.

c) *Would the proposed project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

The project site is located on the TRHS campus, and La Vista High School borders the project site to the east. As discussed in Section XI(a), construction and operation of the proposed project would handle small amounts of hazardous materials typical of construction activities and school related activities (during operation). The use, transportation and storage of hazardous materials would be required to comply with all applicable state and federal regulations that would ensure the proper handling of such materials. As discussed in Section XI(b), there is no evidence that a hazardous materials release or threatened release have occurred on the project site or within a

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0.25 mile radius of the project site. The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Thus, impacts would be **less than significant**.

d) *Would the proposed project be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?*

Seven environmental lists were searched for hazardous materials sites on the project site:

- GeoTracker. State Water Resources Control Board (SWRCB 2025)
- EnviroStor. Department of Toxic Substances Control (DTSC 2025a)
- EnviroStor. Cortese List (DTSC 2025b).
- CalEPA. Cortese List Data Resources. (CalEPA 2025a).
- CalEPA. California EPA. (CalEPA 2025b)
- Solid Waste Information System (SWIS). California Department of Resources Recovery and Recycling (Cal Recycle 2025).
- Well Finder. Geologic Energy Management Division (CalGEM)(DOC 2025f)

As discussed in Section IX(b), three hazardous waste sites were identified at the campus (which includes the project site) two of which are not associated with the District/TRHS as their address indicate the sites are off-site (1.4 miles southwest of the project site), and the project site is identified as a site that stores chemical/hazardous materials on-site. However, this is typical of all public schools due to the use of hazardous materials typical of school facilities such as cleaning and maintenance supplies, which would be stored in accordance with federal, state, and local policies. In addition, the hazardous waste sites identified at 909 and 800 north State College Boulevard have a cleanup status of no further action, and completed - case closed, and do not have the potential for an accidental release of hazardous materials. Therefore, the proposed project would not create a hazard to the public because of a hazardous materials site compiled pursuant to Government Code Section 65962.5. Impacts would be **less than significant**.

e) *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the proposed project result in a safety hazard or excessive noise for people residing or working in the project area?*

The closest public airport to the project site is Fullerton Municipal Airport approximately 4.8 miles west of the project site. The project site is not within the Fullerton Municipal Airport land use plan airport impact zones nor noise contours (OC ALUC 2019). The project site is not within two miles of a public airport or public use airport. **No impact** would occur.

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f) Would the proposed project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Please refer to Section XX(a), *Wildfire*, for discussion on interference with an adopted emergency response plan or emergency evacuation plan. A **less than significant** impact to an adopted emergency response plan or emergency evacuation plan were identified.

g) Would the proposed project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

The project site is in a highly developed and urbanized residential area in the City of Fullerton. As discussed in Section XX, *Wildfire*, according to the Fullerton Safety Element Supplement the project site and the surrounding area are not within a Very High Fire Hazard Severity Zone (VHFHSZ) and there are no areas within the City within a wildland urban fire interface or historic fire perimeter (Fullerton 2025b). The proposed project would not expose any additional persons or structures directly or indirectly to a significant risk of loss, injury, or death involved by wildland fires. **No impact** would occur.

X. Hydrology and Water Quality

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i) result in a substantial erosion or siltation on- or off-site;	☐	☐	☒	☐

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Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

DISCUSSION

a) *Would the proposed project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?*

Urban runoff from storms or nuisance flows (runoff during dry periods) from development projects can carry pollutants to receiving waters. Runoff can contain pollutants such as oil, fertilizers, pesticides, trash, and sediment. This runoff can flow directly into local streams or into storm drains and continue through stormwater pipes until it is released untreated into a local waterway and eventually the ocean. Untreated stormwater runoff degrades water quality in surface waters and groundwater and can affect drinking water, human health, and plant and animal habitats. The construction and operational phases of the proposed project could have the potential to impact water quality. The following is a discussion of the potential impact that the construction and operational phases of the proposed project could have on water resources and quality.

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Construction

Clearing, grading, excavation, and construction activities associated with the proposed project may impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials such as fuels, solvents, and paints may present a risk to surface water quality. Finally, the refueling and parking of construction vehicles and other equipment on-site during construction may result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

The proposed project would be required to comply with all applicable regulatory requirements governing water quality. The proposed project would be required to comply with the National Pollutant Discharge Elimination System Construction General Permit (CGP) (2022-0057-DWQ). The CGP requires the preparation of a Stormwater Pollution Prevention Plan (SWPPP) that incorporates best management practices (BMPs) to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. The State Water Resource Control Board (SWRCB) mandates that projects that disturb one or more acres of land must obtain coverage under the Statewide CGP. Prior to the start of construction activities, the project applicant must file Permit Registration Documents (PRD) with the SWRCB, which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. The construction contractor is required to maintain a copy of the SWPPP on-site at all times and implement all construction BMPs identified in the SWPPP during construction activities. Prior to the commencement of a grading activities, the project applicant is required to provide proof of filing of the PRDs with the SWRCB.

The SWPPP must describe construction BMPs that address pollutant source reduction and provide measures/controls to mitigate potential pollutant sources. These include, but are not limited to:

- Erosion controls (e.g., earth dikes and swales, mulching, slope drains, compost blankets)
- Sediment controls (e.g., silt fence, sediment trap, sandbag or straw bale barriers)
- Tracking controls (e.g., stabilized construction entrance/exit, tire wash)
- Nonstorm water management (e.g., dewatering practices, vehicle and equipment cleaning)
- Materials and waste management (e.g., material storage, hazardous waste management, soil management)
- Good housekeeping practice

Submittal of the PRDs and implementation of the SWPPP and its associated BMPs throughout the construction phase would result in an impact of **less than significant**.

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Operation

Once the proposed project has been constructed, urban runoff could include a variety of contaminants that are typical of operation of educational uses, that could impact water quality. The proposed project would be required to comply with applicable federal and state laws and local regulations governing the use, storage, transport, and disposal of hazardous materials and would ensure impacts would be less than significant.

The proposed project is required to comply with the post-construction performance standards under the SWRCB's construction general permit. Additionally, requirements for waste discharges to stormwater from operation of developed land uses are set forth in the Municipal Stormwater Permit (MS4 Permit), Order No. R8-2009-0030 as amended by Order R8-2010-0062, issued by the Santa Ana Regional Water Quality Control Board (RWQCB). The proposed project is required to prepare and implement a WQMP pursuant to the MS4 Permit, specifying BMPs to be used during project design and operation to minimize stormwater pollution. The WQMP is required to be prepared in accordance with the Model Water Quality Management Plan and Technical Guidance Document. In compliance with the MS4 Permit, specific nonstructural and structural source control BMPs would be incorporated into the proposed project. Typical site-design BMPs and source-control BMPs include the examples below. The proposed project would use a combination of BMPs to meet SWRCB's requirements.

Site Design BMPs

Site design BMPs would be incorporated into the project's design to reduce the potential impacts on surface and groundwater quality. These may include, but are not limited to:

- Maximizing pervious areas and minimizing directly connected impervious areas
- Using on-site ponding areas (i.e., at-grade detention basins)
- Constructing hardscape with permeable materials and implementing hydrologically functional landscape design.
- Incorporating trees, open space, and landscaping to mitigate urban heat island impacts.
- Including mostly native plants and drought-tolerant plants in landscaping plans.
- Using effective irrigation systems to minimize water usage.

Source Control BMPs

Source control BMPs effectively minimize the potential for typical urban pollutants to contact stormwater, thereby limiting water quality impacts downstream. Source control BMPs would be incorporated into the proposed project and implemented throughout the operation of the campus. These BMPs could include the following:

- Educational uses related to urban runoff provided to all employees, and staff.

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- Inspection and maintenance of site BMPs—catch basins, grate inlets, etc.
- Providing storm drain stenciling or signage on all storm drain inlets and catch basins.
- Properly designing and inspecting all trash storage areas, loading docks, outdoor storage areas, and outdoor work areas on a regular basis.

The proposed project would include installation of a new storm drain system and catch basin as part of source control BMP's. The new catch basin would capture stormwater flows and control the amount of water percolating back into the ground, as to not create any onsite flooding. The addition of the catch basin would allow stormwater flows to the City's storm drain system to be similar to existing conditions. As part of the statewide mandate to reduce trash in receiving waters, the proposed project would adhere to the requirements of the SWRCB Trash Amendments. The requirements include the installation and maintenance of full-capture trash screening devices at curb inlets, grate inlets, and catch basin inlets. The trash screening devices must be certified by the SWRCB.

Although the City does not have its own water quality control plan, the City ensures that the policies and programs such as the Water Control Plan for the Santa Ana River Basin (Basin Plan), and NPDES permits are implemented to preserve water quality in the City. Furthermore, the proposed project would be required to meet the City of Fullerton's water quality ordinance (Chapter 12.18 - Water Quality Ordinance). With the implementation of the BMP features, described above, to control the amount and quality of the stormwater leaving the project site, and compliance with State and local regulations, the proposed project would not violate any water quality standards, plans, or waste discharge requirements or otherwise substantially degrade surface or ground water quality. Thus, impacts would be **less than significant**.

b) *Would the proposed project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The project site is located within the Coastal Plain of Orange County basin (OC Basin), which is classified as a medium priority basin due to heavy reliance on the Basin's groundwater as a source of water supply (SGMA 2025).

The City of Fullerton is a retail water supplier that provides water to its residents and other customers using the imported potable water supply obtained from its regional wholesaler, Metropolitan Water District of Southern California (MET), and local groundwater from the Orange County Groundwater Basin (OC Basin), which is managed by the Orange County Water District (OCWD) (Fullerton 2021). The City's Water Utility operates 15 reservoirs with a capacity of 67.5 million gallons (MG), 12 booster pumping stations, 8 active groundwater wells, and manages about 424-mile water mains system with approximately 31,936 service connections. In 2019-20, the City relied on 79% groundwater and 21% imported water. It is projected that by

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2045, the water supply portfolio will shift to approximately 85% groundwater and 15% imported water. If needed, the City's agreement with the MET allows the City to purchase significantly more imported water.

The project site is currently developed with the existing TRHS academic related buildings, parking lot, and athletic fields. Stormwater from the project site percolates into the ground in pervious areas. The proposed project would result in a negligible increase in impervious surfaces compared to existing conditions with the construction of a new bleacher concrete pad. The proposed project would not introduce a substantial increase in pervious surfaces. Stormwater runoff would be directed into the newly constructed storm drain system and catch basin, existing storm drains on-site, percolate into the ground, and flow into storm drains in the public right-of-way. No water features (e.g., streams or creeks) that serve the purpose of groundwater recharge for the area are in the project vicinity. The project site is not used for groundwater recharge activities, nor does it represent a significant or important source of groundwater recharge or extraction. The project does not propose groundwater wells that would extract groundwater from an aquifer, and it would not substantially interfere with groundwater supplies, recharge, or a groundwater management plan. Therefore, impacts on groundwater supplies would be **less than significant**.

- c) ***Would the proposed project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:***
- i) **result in a substantial erosion or siltation on- or off-site;**
 - ii) **substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;**
 - iii) **create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or**
 - iv) **impede or redirect flood flows?**

Erosion or Siltation

Erosion and siltation impacts that could result from alteration of drainage patterns would, for the most part, occur during the proposed project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topography, soil type, wind, and rainfall. Siltation is associated with sediment transport and deposition in waterways. The proposed project would not involve the alteration of any natural drainage channels or any watercourse, since none exist onsite. The proposed project would result in an increase in impervious surfaces compared to existing conditions. The proposed project's

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construction includes grading, utilities trenching, demolition of walls and internal, and asphalt demolition. If not controlled, the transport of soil from earthwork to local waterways could temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways.

As discussed in Section X(a), the proposed project would be required to submit PRDs and a SWPPP to the SWRCB for approval prior to any construction activities. The SWPPP would describe the BMPs to reduce the impact of erosion and siltation (as described above). The operational phase of the project would be required to comply with State and local regulations, which would include SWRCB Trash Amendments, site design, and source control BMPs, as described in Section X(a), to reduce erosion and siltation. Implementation of the project BMPs during the construction and operational phase would ensure that erosion and siltation impacts would be **less than significant**.

Flooding on- or Offsite

The project site is developed with the existing TRHS academic related buildings, parking lot, and athletic fields. The proposed project would not involve the alteration of any natural drainage or watercourse, since none exist onsite.

The proposed project would alter the existing drainage onsite. Stormwater runoff would be directed into newly constructed storm drain system and catch basin; as well as the existing storm drains on-site, percolate into the ground, and flow into storm drains in the public right-of-way.

The proposed project would result in an increase of impervious surfaces on the project site; however, with the implementation of site BMPs (as discussed in Section X(a)), the amount of stormwater runoff reaching the City's storm drain system would be similar to existing conditions and not induce flooding on-site. The proposed project BMPs, like the catch basin, would be designed to collect and detain peak runoff flows. The proposed project would not substantially increase the rate or amount of surface runoff in a manner that would cause flooding. Therefore, impacts related to stormwater drainage and flooding are **less than significant**.

Stormwater Drainage Systems

The project site is fully developed with the existing TRHS academic related buildings, parking lot, and athletic fields. The proposed project would result in an increase in impervious surfaces compared to existing conditions with the construction of a new bleachers concrete pad. The proposed project would result in an increase of approximately 16,300 square feet (0.23 acres) of impervious surfaces compared to existing conditions, which would contribute to runoff water. The increase in impervious surfaces would be considered negligible (as discussed in Section X(b)), and stormwater from the proposed project would be directed into the newly constructed

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storm drain system and catch basin, existing storm drains on-site, percolate into the ground, and flow into storm drains in the public right-of-way. With the addition of a catch basin designed to collect and detain peak runoff flows and allow storm water to percolate into the ground in a controlled manner. Therefore, the proposed project would generate stormwater flows similar to existing conditions. As discussed in Section X(a), construction and operation of the proposed project would be required to implement BMPs that would control the amount and quality of stormwater leaving the project site.

Construction and operation of the proposed project would use small quantities of hazardous materials, such as oil, solvents, paint, and gasoline during construction (among other materials), and chemicals used for cleaning and maintenance, and paints during operation (among other materials). All potentially hazardous materials used onsite are typical of construction activities and of educational uses. All potentially hazardous materials would be properly handled, stored, used and disposed of, and would not represent a substantial source of pollution, nor a new use on-site.

The proposed project would not exceed the capacity of existing stormwater drainage systems and would not create substantial additional sources of polluted runoff. Impacts would be **less than significant**.

Impede or Redirect Flood Flows

The project site is not within a Federal Emergency Management Act (FEMA) 100-year flood zone (FEMA 2025). The project site is within FEMA Flood Zone X areas of minimal flood hazard. In addition, approximately 0.02 miles east of the project site is Flood Zone X (0.2% annual chance flood hazard, areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile).

According to the California Department of Water Resources' Dam Breach Inundation Map, the project site is not within any inundation area (CDWR 2025b). In addition, based on the National Inventory of Dams, the project site and the majority of the City of Fullerton are within an inundation zone or potential inundation zone from Fullerton Dam or Carbon Canyon Dam (USACE 2025). As discussed above, construction of the proposed project would not greatly impede or redirect flood flows. The proposed project would be designed and constructed to be consistent with CBC and other Title 24 building requirements. With adherence to the CBC and federal, State, and local policies, the proposed project would not substantially alter the drainage of the project site, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner that impedes or redirect flood flows. Impacts would be **less than significant**.

d) *In flood hazard, tsunami, or seiche zones, would the proposed project risk release of pollutants due to project inundation?*

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The project site is not within a tsunami hazard area (DOC 2025g). Therefore, the proposed project would not risk the release of pollutants due to tsunamis.

The project site is not within a FEMA 100-year flood zone; the site is within Zone X areas of minimal flood hazard (FEMA 2025). The closest identified flood zone by the FEMA National Flood Hazard Layer Viewer is Flood Zone X (0.2% annual chance flood hazard, areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile), approximately 0.02 miles east of the project site.

A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam, or other artificial body of water. Although there are no large water tanks in the area that could impact the proposed project site, there are dams in the region that could create flooding impacts. According to the National Inventory of Dams, the project site and the majority of the City of Fullerton are within an inundation zone or potential inundation zone (USACE 2025). Although the proposed project is expected to use small amounts of hazardous materials during construction and operation (e.g., paints, cleaners, oils, etc.), the construction and operation of the proposed project would be required to comply with applicable regulations for proper handling, usage, and storage of potentially hazardous materials (see Section IX, *Hazards and Hazardous Materials*). With adherence to State and local policies and DSA review, the proposed project would not release pollutants in the event of project inundation or flood. A **less than significant** impact would occur.

e) *Would the proposed project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

As previously mentioned in Impact X(b), the proposed project would not substantially interfere with groundwater supplies or recharge and would not obstruct implementation of a sustainable groundwater management plan. The proposed project would be required to submit construction drawings to DSA for approval and would comply with existing local and State regulations.

In addition, the project would not conflict or obstruct any water quality standards or plans, with compliance with the Basin Plan and all applicable State and local water quality regulations. The project would comply with the NPDES permit requirements, the City of Fullerton's water quality ordinance (Chapter 12.18 - Water Quality Ordinance), and site BMPs to manage the quantity and quality of stormwater runoff. Therefore, this impact is **less than significant**.

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XI. Land Use and Planning

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

DISCUSSION

a) *Would the proposed project physically divide an established community?*

The proposed project would not divide an established residential community because it would occur entirely within the existing TRHS campus. Therefore, the proposed project would not physically divide an established community and **no impact** would occur.

b) *Would the proposed project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

As stated in Section 2.2.4, *Existing General Plan Land Use and Zoning*, the project site has a land use designation of SCH and is zoned P-L. The land use designation and zoning allow for educational uses which is consistent with the project site's existing land use designation and zoning. Additionally, the proposed project consists of seismic retrofitting, interim portable classrooms, and athletic field improvements. The proposed project would not alter or modify the project site's current land use and zoning designations. Development of the proposed project would not conflict with any applicable land use plans, policies or regulations. Therefore, there would be **no impact**.

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XII. Mineral Resources

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

DISCUSSION

a) *Would the proposed project result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?*

In 1975, the state legislature adopted the Surface Mining and Reclamation Act, which designated mineral resources zones (MRZ) of statewide or regional importance. The classifications used to define MRZs are:

- **MRZ-1:** Areas where available geologic information indicates that little likelihood exists for the presence of significant mineral resources.
- **MRZ-2a:** Areas underlain by mineral deposits where geologic data indicate that significant measured or indicated resources are present. MRZ-2 is divided on the basis of both degree of knowledge and economic factors. Areas classified MRZ-2a contain discovered mineral deposits that are either measured or indicated reserves as determined by such evidence as drilling records, sample analysis, surface exposure, and mine information. Land included in the MRZ-2a category is of prime importance because it contains known economic mineral deposits.
- **MRZ-2b:** Areas underlain by mineral deposits where geologic information indicates that significant inferred resources are present. For this report, areas classified MRZ-2b contain discovered mineral deposits that are significant inferred resources as determined by their lateral extension from proven deposits or their similarity to proven deposits. Further exploration work could result in upgrading areas classified MRZ-2b to MRZ-2a.

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- **MRZ-3a:** Areas containing known mineral occurrences of undetermined mineral resource significance. Further exploration work within these areas could result in the reclassification of specific localities into MRZ-2a or MRZ-2b categories. MRZ-3 is divided on the basis of knowledge of economic characteristics of the resources.
- **MRZ-3b:** Areas containing inferred mineral occurrences of undetermined mineral resource significance. Land classified MRZ-3b represents areas in geologic settings that appear to be favorable environments for the occurrence of specific mineral deposits. Further exploration work could result in the reclassification of all or part of these areas into the MRZ-2a or MRZ-2b categories.
- **MRZ-4:** Areas of no known mineral occurrences where geologic information does not rule out either the presence or absence of significant mineral resources.

The project site is also located within MRZ-1 which indicates that the presence of significant mineral resources is unlikely (CGS 2025). Additionally, mining on the project site would be incompatible with the surrounding uses, which consist mostly of educational and residential uses. Mining is also not a permitted use under the project site's general plan land use and zoning designations. Implementation of the proposed project would not result in the loss of availability of a known mineral resource or resource recovery site. **No impact** would occur.

b) *Would the proposed project result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?*

As discussed in Section XII(a), no mineral resources are identified on the project site and it is unlikely that mineral resources are located on the project site. Additionally, the City of Fullerton's General Plan indicates that no locally important mineral resource recovery sites exist within the City because of the lack of information about mineral resources within the General Plan (Fullerton 2012a). Therefore, **no impact** would occur.

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XIII. Noise

Would the project result in:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Noise is defined as unwanted sound. It is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, the federal government, State of California, and City of Fullerton have established criteria to protect public health and safety and to prevent disruption of certain human activities. Additional information on noise and vibration fundamentals is contained in Appendix C.

Certain land uses are particularly sensitive to noise and vibration. The City of Fullerton General Plan considers residential uses, schools, hospitals, residential care facilities, churches, hotels, motels, and parks as noise sensitive. The nearest sensitive receptors to the project site are Noise sensitive receptors near the project site are single family residential uses to the south along Nutwood Avenue and single-family residential land uses to the west across the western campus parking lot. There are single-family residential uses to the north, however, they are approximately 700 feet from the project site and shielded by intervening buildings.

3. ENVIRONMENTAL EVALUATION

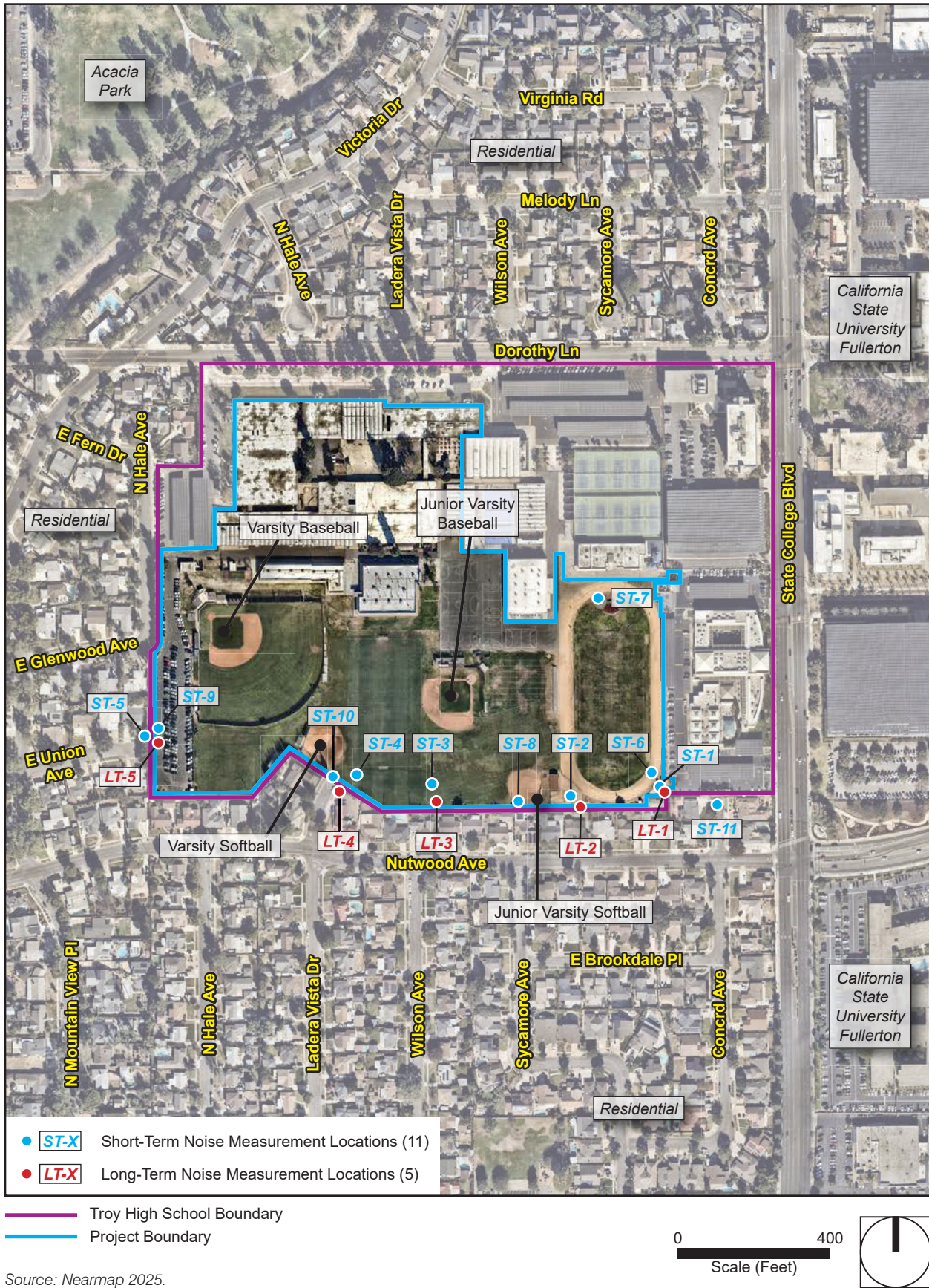
Ambient Noise Monitoring

The noise environment in the project area is primarily influenced by traffic noise on Valencia Avenue. The noise environment around the project site is characterized by typical neighborhood and educational uses. Free-flowing traffic noise on Dorothy Lane and State College Boulevard and parking lot activities also contribute to typical existing noise environment. The Troy High School fields are also active during the weekends supporting organized sporting activities. The nearest sensitive receptors to project site are residential uses adjacent to and south of the Troy High School fields and to the west across Hale Avenue.

To determine baseline noise levels in the project vicinity, ambient noise monitoring of an organized sporting activity, football games, was conducted by PlaceWorks during a weekend. Additional ambient noise monitoring was conducted during the weekday without active organized sporting activities. Eleven short-term (15-minute) and five long-term (24-hour) measurement locations were selected and conducted around the project site. All measurements were conducted between Friday, June 27 through Monday, June 30, 2025. The short-term sound level meter (Larson Davis LxT) and the long-term sound level meter (Picollo II) used for noise monitoring satisfy the American National Standards Institute (ANSI) standard for Type 1 and Type 2 instrumentation, respectively. The sound level meters were set to “slow” response and “A” weighting (dBA) and calibrated prior to and after each monitoring period.

Measurements were at least 5 feet above the ground and away from reflective surfaces. Temperatures were moderate, ranging from approximately 79 degrees to 88 degrees Fahrenheit, with wind speeds of up to 12 miles per hour and moderate humidity. Noise measurement locations are described below and shown on Figure 11, *Approximate Noise Monitoring Locations*.

Figure 11 - Approximate Noise Monitoring Locations



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3. ENVIRONMENTAL EVALUATION

Short Term Measurements

Eleven short-term (15-minute) measurement locations were selected and conducted around the project site. All measurements were conducted on Saturday, June 28 and Monday June 30, 2025, in the afternoon at the end of the school day, as parents were picking up students. Results are summarized in Table 10, *Short-Term Noise Measurements Summary*.

- **Short-Term Location 1 (ST-1)** was near the backyard fence of the residence at 2331 Nutwood Avenue, between the existing track and field and La Vista High School parking lot. A 15-minute noise measurement began at 11:28 am on Saturday, June 28, 2025. The noise environment is characterized by multiple youth football games and parking lot noise. Noise levels measured 60.6 dBA Leq and 72.5 dBA Lmax during the measurement period at ST-1.
- **Short-Term Location 2 (ST-2)** was near the backyard fence of the residence at 2313 Nutwood Avenue. A 15-minute noise measurement began at 11:11 am on Saturday, June 28, 2025. The noise environment is characterized primarily by spectator noise of youth football games consisting of amplified music, spectators talking and cheering, players shouting, and referee whistle blasts. Noise levels measured 57.0 dBA Leq and 72.6 dBA Lmax during the measurement period at ST-2.
- **Short-Term Location 3 (ST-3)** was between two football fields north of the residences at 2219 and 2225 Nutwood Avenue. A 15-minute noise measurement began at 10:29 am on Saturday, June 28, 2025. The noise environment is characterized primarily by noise of youth football games consisting of player warm-ups, spectators, and equipment movement. Noise levels measured 62.0 dBA Leq and 78.1 dBA Lmax during the measurement period at ST-3.
- **Short-Term Location 4 (ST-4)** was at the end of the cul-de-sac, north of the residence at 800 Ladera Vista Avenue. A 15-minute noise measurement began at 10:04 am on Saturday, June 28, 2025. The noise environment is characterized primarily by noise of youth football games consisting of spectators talking and cheering, players and coaches shouting, and referee whistle blasts. Noise levels measured 59.7 dBA Leq and 74.6 dBA Lmax during the measurement period at ST-4.
- **Short-Term Location 5 (ST-5)** was west of the Troy High School parking lot, near the cul-de-sac of east Union Avenue. A 15-minute noise measurement began at 11:59 am on Saturday, June 28, 2025. The noise environment is characterized primarily by parking lot noise consisting of engines idling and car pass-bys. Noise levels measured 51.7 dBA Leq and 66.0 dBA Lmax during the measurement period at ST-5.
- **Short-Term Location 6 (ST-6)** was at the southeast corner of the Troy High School track and field, west of La Vista High School parking lot. A 15-minute noise measurement began at 12:29 am on Saturday, June 28, 2025. The noise environment is characterized primarily by noise of youth football games consisting of spectators yelling, cheering, and clapping, as well as referee whistle blasts. Noise levels measured 64.2 dBA Leq and 79.9 dBA Lmax during the measurement period at ST-6.

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- **Short-Term Location 7 (ST-7)** was at the northwest corner of the Troy High School track and field, next to the high jump pitch. A 15-minute noise measurement began at 12:49 am on Saturday, June 28, 2025. The noise environment is characterized primarily by noise of youth football games consisting of music from DJ booth, portable generator, and football game play. Noise levels measured 65.7 dBA Leq and 77.2 dBA Lmax during the measurement period at ST-7.
- **Short-Term Location 8 (ST-8)** was approximately 15 feet north of the backyard fence of the residence at 2301 Nutwood Avenue. A 15-minute noise measurement began at 10:49 am on Saturday, June 28, 2025. The noise environment is characterized by multiple youth football games consisting of spectators yelling and football game play. Noise levels measured 58.0 dBA Leq and 75.5 dBA Lmax during the measurement period at ST-8.
- **Short-Term Location 9 (ST-9)** was west of the Troy High School parking lot, near the cul-de-sac of east Union Avenue. A 15-minute noise measurement began at 8:00 am on Monday, June 30, 2025. The noise environment is characterized primarily by residential noise consisting of birds chirping and dogs parking. Noise levels measured 46.8 dBA Leq and 57.6 dBA Lmax during the measurement period at ST-9.
- **Short-Term Location 10 (ST-10)** was at the end of the cul-de-sac, north of the residence at 800 Ladera Vista Avenue. A 15-minute noise measurement began at 9:17 am on Monday, June 30, 2025. The noise environment is characterized primarily by residential noise consisting of birds chirping, lawn equipment, and vehicle passbys on Nutwood Avenue. Noise levels measured 50.0 dBA Leq and 73.8 dBA Lmax during the measurement period at ST-10.
- **Short-Term Location 11 (ST-11)** was at the end of Concord Avenue cul-de-sac, between the residences at 807 and 806 Concord Avenue. A 15-minute noise measurement began at 8:36 am on Monday, June 30, 2025. The noise environment is characterized primarily by residential noise consisting of birds chirping and State College traffic noise. Noise levels measured 52.0 dBA Leq and 67.6 dBA Lmax during the measurement period at ST-11.

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Table 10 Short-Term Noise Measurements Summary

Monitoring Location	Description	15-minute Noise Level, dBA						
		L _{eq}	L _{max}	L _{min}	L ₉₀	L ₅₀	L ₂₅	L ₈
ST-1	Near backyard fence of 2331 Nutwood Ave.	60.6	72.5	54.9	57.4	59.3	60.7	62.9
ST-2	Near backyard fence of 2313 Nutwood Avenue.	57.0	72.6	49.2	52.8	55.1	56.8	59.4
ST-3	North of the residences at 2219 and 2225 Nutwood Avenue.	62.0	78.1	49.5	53.7	57.1	60.2	65.7
ST-4	Cul-de-sac, north of 800 Ladera Vista Avenue.	59.7	74.6	49.0	53.5	57.5	60.0	63.2
ST-5	West of the Troy High School parking lot.	51.7	66.0	42.7	44.8	49.0	51.3	53.8
ST-6	Southeast corner of the Troy High School track and field.	64.2	79.9	53.5	56.8	60.0	63.0	67.8
ST-7	Northwest corner of the Troy High School track and field,	65.7	77.2	56.3	58.2	64.1	65.9	69.7
ST-8	Near backyard fence of 2301 Nutwood Avenue.	58.0	75.5	48.0	51.2	54.3	56.4	61.0
ST-9	West of the Troy High School parking lot.	56.8	57.6	41.7	43.5	45.9	47.4	48.8
ST-10	Cul-de-sac, north of 800 Ladera Vista Avenue.	50.0	73.8	41.0	42.1	44.4	47.1	51.1
ST-11	End of Concord Avenue cul-de-sac, between 807 and 806 Concord Avenue	52.0	67.6	42.8	45.8	49.1	51.7	56.2

Source: PlaceWorks. See Appendix C.

Long-Term Measurements

Ambient noise monitoring was conducted over a 48-hour period from Friday, June 27, 2025, through Sunday June 29, 2025. Five long-term noise meters were mounted at locations along the single-family residential uses south of the project site. The noise environment was characterized by summer camp, football games consisting of spectators cheering, game play, referee whistle blasts, coaches and players communicating, amplified music, and track and field activities during the daytime hours. Long-term measurement results at each of the five locations are described in the following paragraphs and summarized in Table 11, *Long-Term Noise Measurement Summary*. Figure 11 shows the long-term (24-hour) noise measurement locations. Complete hourly interval noise monitoring data is shown in Appendix C.

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- **Long-Term Location 1 (LT-1)** was at the southeastern portion of the project site, between La Vista High School parking lot and the existing project track and approximately 10 feet north of 807 Concord Avenue. Average hourly daytime noise levels from June 27 to 28 ranged from 61.5 dBA to 62.5 dBA Leq, evening noise levels ranged from 51.7 dBA to 52.7 dBA Leq, and nighttime noise level ranged from 48.4 dBA to 50.8 dBA Leq during the two days of continuous 24-hour noise monitoring. The 24-hour noise level was 59.7 dBA CNEL for Day 1 and 61.5 dBA CNEL for Day 2.
- **Long-Term Location 2 (LT-2)** was near the backyard fence of the residence at 2313 Nutwood Avenue. Average hourly daytime noise levels from June 27 to 28 ranged from 56.5 dBA to 57.5 dBA Leq, evening noise levels ranged from 47.2 dBA to 48.3 dBA Leq, and nighttime noise level ranged from 43.4 dBA to 43.7 dBA Leq at LT-3. The 24-hour noise level was 55.9 dBA CNEL for Day 1 and 55.3 dBA CNEL for Day 2.
- **Long-Term Location 3 (LT-3)** was near the backyard fence of the residence at 2313 Nutwood Avenue. Average hourly daytime noise levels from June 27 to 28 ranged from 60.6 dBA to 63.5 dBA Leq, evening noise levels ranged from 48.1 dBA to 48.3 dBA Leq, and nighttime noise level ranged from 43.6 dBA to 44.5 dBA Leq at LT-3. The 24-hour noise level was 61.0 dBA CNEL for Day 1 and 55.3 dBA CNEL for Day 2.
- **Long-Term Location 4 (ST-4)** was at the end of the cul-de-sac, north of the residence at 800 Ladera Vista Avenue. Average hourly daytime noise levels from June 27 to 28 ranged from 54.8 dBA to 61.6 dBA Leq, evening noise levels ranged from 47.7 dBA to 48.3 dBA Leq, and nighttime noise level ranged from 44.6 dBA to 44.2 dBA Leq during the two days of continuous 24-hour noise monitoring. The 24-hour noise level was 59.3 dBA CNEL for Day 1 and 54.5 dBA CNEL for Day 2.
- **Long-Term Location 5 (LT-5)** was west of the Troy High School parking lot, near the cul-de-sac of east Union Avenue. Average hourly daytime noise levels from June 27 to 28 ranged from 53.5 dBA to 56.7 dBA Leq, evening noise levels ranged from 47.3 dBA to 48.9 dBA Leq, and nighttime noise level ranged from 46.0 dBA to 46.3 dBA Leq at LT-3. The 24-hour noise level was 56.3 dBA CNEL for Day 1 and 54.5 dBA CNEL for Day 2.

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Table 11 Long-Term Noise Measurements Summary

Monitoring Location	CNEL, dBA		Time of Day	Averages, dBA							
				Leq		Lmax		L50		L90	
	Day 1	Day 2		Day 1	Day 2	Day 1	Day 2	Day 1	Day 2	Day 1	Day 2
LT-1	59.7	61.5	Daytime (7 a.m. - 7 p.m.)	61.0	62.5	75.7	76.5	52.4	54.0	49.3	51.3
			Evening (7 p.m. - 9 p.m.)	51.7	52.7	68.2	70.9	50.5	51.2	48.5	49.4
			Nighttime (9 p.m. - 7 a.m.)	48.4	50.8	69.5	59.7	44.8	46.8	43.4	45.0
LT-2	55.9	56.3	Daytime (7 a.m. - 7 p.m.)	57.5	56.5	71.4	74.4	48.1	50.2	45.5	47.7
			Evening (7 p.m. - 9 p.m.)	47.2	48.3	63.6	67.0	46.3	47.1	44.7	45.5
			Nighttime (9 p.m. - 7 a.m.)	43.4	43.7	59.2	56.7	41.9	42.0	40.9	40.9
LT-3	58.3	61.0	Daytime (7 a.m. - 7 p.m.)	60.6	63.5	75.1	76.1	50.0	51.5	46.2	48.0
			Evening (7 p.m. - 9 p.m.)	48.3	48.1	66.6	67.3	45.4	46.8	44.0	44.9
			Nighttime (9 p.m. - 7 a.m.)	43.6	44.5	58.9	58.8	42.2	43.2	41.0	41.4
LT-4	59.3	54.5	Daytime (7 a.m. - 7 p.m.)	61.6	54.8	74.2	74.0	49.4	48.6	45.5	45.9
			Evening (7 p.m. - 9 p.m.)	48.3	47.7	64.6	70.2	45.9	45.2	44.4	43.5
			Nighttime (9 p.m. - 7 a.m.)	44.2	44.6	59.8	57.8	42.0	42.8	41.0	41.7
LT-5	56.3	54.5	Daytime (7 a.m. - 7 p.m.)	56.7	53.5	73.7	69.7	48.6	47.4	44.9	43.2
			Evening (7 p.m. - 9 p.m.)	48.9	47.3	66.8	67.9	46.0	42.6	44.0	40.5
			Nighttime (9 p.m. - 7 a.m.)	46.3	46.0	61.6	57.6	42.6	42.7	40.5	40.4

Source: PlaceWorks. See Appendix C.

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Applicable Noise Standards

City of Fullerton Noise Standards

The City of Fullerton's regulations with respect to noise are included in Chapter 15.90, Noise Standards and Regulation, of the Municipal Code, also known as the Noise Ordinance.

Construction-related and operational noise restrictions are discussed below:

Section 15.90.030, Noise Standards, defines the interior and exterior noise level limits for residential land uses that apply at all property within the Residential Noise Zone. Table 12, *City of Fullerton Sound Level Limits*, shows the City of Fullerton noise limits applied to sensitive uses defined as private or public school, hospital, residential care facility for the elderly, and religious institution. The City does not have specific noise level limits for commercial or industrial zones.

Table 12 City of Fullerton Sound Level Limits

Land Use	Noise Level (dBA) Property Line	Time Period
Exterior Noise Limits	55	7:00 am to 10:00 pm
	50	10:00 pm to 7:00 am
Interior Noise Limits	55	7:00 am to 10:00 pm
	45	10:00 pm to 7:00 am

Source: Fullerton General Plan Noise Element, Table N-3, "City of Fullerton Exterior and Interior Noise Limits"

1. The noise standard for a cumulative period of more than 30 minutes in any hour;
2. The noise standard plus 5 dBA for a cumulative period of more than 15 minutes but less than 30 minutes in any hour;
3. The noise standard plus 10 dBA for a cumulative period of more than 5 minutes but less than 15 minutes in any hour;
4. The noise standard plus 15 dBA for a cumulative period of more than one minute but less than five minutes in any hour; and
5. The noise standard plus 20 dBA for a cumulative period of less than one minute in an hour."

Section 15.90.040, Activities exempt from standards, of the Municipal Code states the following activities shall be exempt from the noise level standards specified by this chapter:

- School bands, school athletic and school entertainment events.
- Outdoor gatherings, public dances, shows and sporting and entertainment events provided the events are conducted pursuant to a permit and/or license issued by the city.
- Activities conducted on public parks, public playgrounds and public or private school grounds.

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Section 15.90.050, Activities with special provisions, of the Municipal Code states the following activities shall be exempt from the noise level standards specified by this chapter provided they take place between the hours of 7:00 am and 8:00 pm on any day except Sunday or a City-recognized holiday.

- Noise sources associated with construction, repair, remodeling, or grading of any real property;
- Noise sources associated with the maintenance of real property, including normal maintenance and repair by city and utility crews.

Federal Transit Administration (FTA) Guidelines

The City does not have regulatory standards for construction or operational noise and vibration sources. As such, the FTA guidelines for construction noise at residential uses of 80 dBA Leq, a vibration standard of 0.2 inches per second (in/sec) peak particle velocity (PPV) not be exceeded to protect normal residential buildings, and a standard of 0.08 in/sec PPV not be exceeded to protect old or historically significant structures is used to determine compliance.

DISCUSSION

- a) ***Would the proposed project result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?***

Construction

Improvements to the school campus include seismic retrofitting and modernization, installation of interim portable classrooms during seismic retrofitting construction and modernization, and athletic field improvements. As part of the seismically retrofitting process, the existing roof-slabs would be tied into the columns of the buildings, anchoring the building and associated structures to its foundation, reinforcing walls, columns, and beams, adding shear walls or steel bracing, and stabilizing soft or weak stories. Retrofitting and modernization includes demolition of interior and exterior finishings, such as, flooring, roofing, walls, doors, and windows. Modernization improvements for all buildings would include installation of both interior and exterior finishes. A proposed new internal layout for the administration building would accommodate a student union area, restrooms, storage, a staff workroom, a student store, hallways, and custodial, electrical, and mechanical rooms. Proposed athletic field improvements would install field lighting at the baseball and softball fields and bleachers and field lighting with a PA system at the track and field. Track and field improvements would include construction of a new rubberized synthetic track with a new synthetic turf field, a golf putting green, long jump

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area, discus pad and cage, reconstruction of the shotput field, and replacing the football goal post and scoreboard.

The proposed project would extend evening practices within the hours of 3:30 PM to 8:00 PM for 7 sports/activities including Troy baseball, Troy athletics, boys and girls practice and games, girls flag football, California State University, Fullerton reserve officers training corps, softball practice, youth practice, and Troy football OC elite practice. Practices would not have spectators. The District intends to host periodic schoolwide assemblies at the track and field throughout the school year which would accommodate the entire student body and would occur within the regular school operating hours.

The proposed project would be constructed in three phases over approximately 2 years. Phase one is anticipated to occur from August 2026 to September 2026 and would include installation of interim portable classrooms, seismic retrofitting and modernization of classroom building 300 and track and field improvements. Phase two is anticipated to occur from April 2027 to December 2027 and would include the seismic retrofitting and modernization of classroom buildings 400 and 500. Phase three is anticipated to occur from December 2027 to August 2028 and would include seismic retrofitting and modernization of classroom building 200 and the administration building and the removal of interim portable classrooms. No nighttime work or the use of pile-driving equipment is proposed.

Noise generated during construction is based on the type of equipment used, the location of the equipment relative to sensitive receptors, and the timing and duration of the noise-generating activities. Noise levels from construction activities are dominated by the loudest piece of construction equipment. The dominant noise source is typically the engine, although work piece noise (such as dropping of materials) can also be noticeable.

The noise produced at each construction phase is determined by combining the Leq contributions from the three loudest pieces of equipment used at a given time while accounting for the ongoing time variations of noise emissions (commonly referred to as the usage factor). Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on what specific activity is being performed at any given moment.

Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively disregarding other attenuation effects from air absorption, ground effects, and shielding effects provided by intervening structures or existing solid walls), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would

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move around the site (site of each development phase) with different equipment mixes, loads, and power requirements.

The expected construction equipment mix was estimated and categorized by construction activity using the Federal Highway Administration Roadway Construction Model (RCNM). Assuming the nearest off-site sensitive receptor to the closest boundary for project construction activities, construction-related noise levels would be up to 80 dBA Leq at the residential uses to the south during light pole installation. Construction noise levels at receptors further away are estimated to be even less. The results are summarized in Table 13, *Project-Related Construction Noise Levels, dBA at the Nearest Receptors*.

Table 13 Project-Related Construction Noise Level, dBA at the Nearest Receptors

Construction Activity Phase ¹	Noise Levels in dBA Leq				
	RCNM Reference Noise Level	Receptor to North	Receptor to South	Receptor to East	Receptor to West
<i>Distance (feet)</i>	50	620	125	145	225
Asphalt Demolition	84	62	76	75	71
Site Prep	81	59	73	71	68
Grading	83	61	75	74	70
<i>Distance (feet)</i>	50	770	420	325	700
Building Construction	79	56	61	63	56
Architectural Coating	77	53	58	60	54
<i>Distance (feet)</i>	50	900	200	305	700
Paving	80	55	68	64	57
<i>Distance (feet)</i>	50	125	75	270	75
Interim Building Installation/Installation	73	65	69	58	69
<i>Distance (feet)</i>	50	170	600	370	105
Building Construction (Phase 1, Phases 2-3)	79	71	75	64	75
Architectural Coating (Phase 1, Phases 2-3)	77	69	73	62	73
<i>Distance (feet)</i>	50	100	30	65	140
Light Pole Installation	76	70	80	74	67
Exceeds 80 L_{eq} Standard?		No	No	No	No

Source: FHWA's RCNM software. See Appendix C

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Note: Distance measurements were taken using Google Earth (2025) from the boundary of work areas to the nearest receptors (see Figure 5 for the boundaries of the work areas associated with the proposed project).

The nearest sensitive receptor to project construction activities are residential uses between 30 and 125 feet south of proposed interim portable classrooms, athletic field improvements, and light pole installation construction phases. Receptors to the south would be exposed to temporary, periodic, short-term noise levels of up to 80 dBA Leq during light pole installation activities. The proposed project's construction activities would occur within the noise standard exempt time frame identified in Section 15.90.050 of the City of Fullerton Municipal Code, 7:00 am and 8:00 pm on any day except Sunday or a City-recognized holiday. The proposed project's construction activities would not exceed FTA's construction noise standard at residential uses (80 dBA Leq). Therefore, the proposed project's construction-related noise impacts would be **less than significant**.

Operational Off-Site Traffic Noise

A project will normally have a significant effect on the environment related to traffic noise if it substantially increases the ambient noise levels for adjoining areas. Most people can detect changes in sound levels of approximately 3 dBA under normal, quiet conditions, and changes of 1 dBA to 3 dBA under quiet, controlled conditions. Changes of less than 1 dBA are usually indiscernible. A significant impact would occur if the following traffic noise increases occur relative to the existing noise environment:

- 1.5 dBA in ambient noise environments of 65 dBA CNEL and higher
- 3 dBA in ambient noise environments of 60 to 64 dBA CNEL
- 5 dBA in ambient noise environments of less than 60 dBA CNEL

Traffic volume data for the new trips associated with the project are provided by DJ&A (2025). The proposed project is expected to increase existing daily trips by 530 new daily project associated trips, with 53 PM peak trips. The data provided by the traffic engineer presents the street and locations with scenarios for existing, existing with project conditions, 2028 no project, and 2028 with project conditions. With project trip additions, noise levels along all analyzed roadway segments would increase by less than 1 dBA. Table 14, *Project-Related Increases in Traffic Noise, dBA CNEL at 50 Feet*, shows that the project trip addition of proposed project trips would not result in a 1.5 dBA increase over existing conditions. Therefore, project-related traffic noise impacts would be **less than significant**.

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Table 14 Project-Related Increases in Traffic Noise, dBA CNEL at 50 Feet

Roadway	Segment		Average Daily Traffic Noise Levels, dBA CNEL					
	From	To	Existing	Existing With Project	Project Increase (Existing)	2028 No Project	2028 With Project	Project Increase (2028)
Dorthy Lane	State College	Driveway 4	66	66	<1	66	66	<1
Dorthy Lane	Driveway 4	Driveway 3	65	65	<1	65	65	<1
Dorthy Lane	Driveway 3	Driveway 2	64	64	<1	64	64	<1
Dorthy Lane	Driveway 2	Victoria Dr	64	64	<1	64	64	<1
Dorthy Lane	Victoria Dr	N Acacia Ave	63	63	<1	63	63	<1
Dorthy Lane	N Acacia Ave	the West	64	64	<1	64	64	<1
Nutwood Ave	the West	Nutwood Ave	59	59	<1	60	60	<1
Nutwood Ave	Nutwood Ave	the East	64	64	<1	65	65	<1
State College Blvd	the North	Dorthy Ln	72	72	<1	72	72	<1
State College Blvd	Dorthy Ln	Nutwood Ave	72	72	<1	72	72	<1
State College Blvd	Nutwood Ave	the South	72	72	<1	72	72	<1
N Hale Ave	Victoria Dr	Driveway 1	55	56	<1	56	56	<1
N Hale Ave	Driveway 1	to the South	53	53	<1	53	53	<1

Source: FHWA Highway Noise Prediction Model (FHWA-RD-77-108) in Appendix C. Based on traffic volumes provided by LLG (see Appendix C).

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Operational On-Site Noise

The proposed project would install field lighting at the baseball and softball fields and bleachers and field lighting with a PA system at the track and field. With the addition of field lights, the proposed project would extend evening practices within the hours of 3:30 PM to 8:00 PM for 7 sports/activities including Troy baseball, Troy athletics, boys and girls practice and games, girls flag football, California State University, Fullerton reserve officers training corps, softball practice, youth practice, and Troy football OC elite practice. The District intends to host schoolwide assemblies at the track and field with the addition of new bleachers that can accommodate the entire student body. The proposed project is anticipated to include infrastructure to allow the implementation of a future PA system. The speakers would be oriented towards the student body in the bleachers. The speakers may be used during schoolwide assemblies that would occur within the regular school operating hours. Schoolwide assemblies are not daily events and would occur periodically throughout the school year. No other changes to operations are proposed as part of the proposed project. The proposed project would not result in any changes to the number of participants, time of year (season), or number of spectators for practices and games. In addition, the proposed project would not introduce any new practices, games, or events at the fields or on-campus.

The proposed project's schoolwide assembly and practice fields operational scenarios were modeled using SoundPLAN computer software. SoundPLAN uses industry-accepted propagation algorithms based on International Organization for Standardization (ISO) and ÖAL-28 standards for outdoor sound propagation. The modeling calculations account for classical sound wave divergence (spherical spreading loss with adjustments for source directivity from point sources) plus attenuation factors due to air absorption and ground effects. Additionally, SoundPLAN provides for other correction factors, including level increases due to reflections, source directivity, and source tonality.

The scenarios modeled included assemblies and playfields events, with 2,200 in attendance at the bleacher area and PA system activity for assemblies; and 200 in attendance for playfield events assuming no PA system activity. See Appendix C for modeling inputs, results, and graphical representations of operational noise contours. SoundPLAN noise modeling estimated noise levels at the receptor locations, representing the nearest residential receptors to the project site. Based on other typical event observations the following additional modeling inputs were assumed to be reasonable:

- Schoolwide assembly 2,200 attendees (Bleachers) was assumed for a cumulative 10 minutes per hour and each cheer interval to be approximately 10 seconds long.
- Six proposed future speakers, with individual announcement durations of 20 seconds, for a cumulative of 12 minutes per hour.
- On-field player activity was assumed to occur for a cumulative of 25 minutes per hour.

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- On-field referee whistle activity was assumed to occur for a cumulative of 25 minutes per hour.
- The band was assumed to play a cumulative of 10 minutes per hour for schoolwide assemblies only.

As discussed above, a change of 5 dBA is readily discernible in an exterior environment and a change in 10 dBA is perceived as a doubling in sound level. Based on this and noted that campus wide assemblies would result in temporary periodic (not daily) increases in ambient noise levels, a threshold of 10 dBA above the ambient is typically applied. A project-related operational noise increase of 10 dBA above ambient noise levels for periodic events (such as assemblies) would be the threshold for a noise impact.

Table 15, *SoundPLAN Modeled Noise Levels, dBA Leq*, shows ambient noise measurements and modeled operational noise levels associated with the proposed project at adjacent representative residential receptor locations. Modeled SoundPLAN scenario inputs, results and operational noise contours associated with proposed project assembly and playfield field noise on the project site and in the greater community for both modeling scenarios are shown in Appendix C.

Table 15 SoundPLAN Modeled Noise Levels, dBA Leq

Receptors	Ambient Measurement dBA Leq	Modeling Scenario, dBA Leq		Increase Over Ambient, dBA	
		Assembly	Playfields	Assembly	Playfields
LT-1	59.7	58.4	53.4	<1	<1
LT-2	55.3	62.9	59.0	7.6	3.7
LT-3	58.3	58.0	58.0	<1	<1
LT-4	54.5	53.8	58.2	<1	<1
LT-5	54.5	48.0	47.9	<1	<1
ST-1	60.6	62.1	59.6	1.5	<1
ST-2	57.0	62.3	59.0	5.3	2.0
ST-3	62.0	56.9	58.6	<1	<1
ST-4	59.7	53.3	60.2	<1	0.5
ST-5	51.7	47.9	47.5	<1	<1
ST-6	64.2	62.7	62.1	<1	<1
ST-7	65.7	66.1	64.9	<1	<1
ST-8	58.0	61.2	58.4	3.2	<1
ST-9	46.8	49.6	49.0	2.8	2.2
ST-10	49.9	53.2	58.6	3.3	8.7
ST-11	52.0	56.6	52.7	4.6	<1

Source: SoundPLAN. See Appendix C,

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As shown in Table 15, future assemblies and playfield event noise levels range from 47.5 dBA to 66.1 dBA Leq at the nearest noise sensitive receptors to the project site. Proposed project noise levels attributable to assemblies would expose residential receptors directly south and in the proximity of the track and field to noise levels ranging between 56.6 dBA (ST-11) and 62.9 dBA Leq (LT-2). Playfield noise during organized, multi-field sport events would expose residential receptors directly south and west of the track and field and auxiliary fields to noise levels ranging between 49.0 dBA (ST-9) and 59.6 dBA Leq (ST-1). Table 15 also shows that future assembly and playfield would result in noise level increases of up to 8.7 dBA over ambient conditions (ST-10). Future schoolwide assemblies and organized, multi-field sport events would not result in a 10 dBA increase above ambient noise conditions at the nearest noise sensitive receptors to the project site. Furthermore, Section 15.90.040 of the Municipal Code exempts school bands, school athletic and school entertainment events from noise level standards specified in Chapter 15.90. Therefore, project-related operational noise impacts would be **less than significant**.

b) *Would the proposed project result in the generation of excessive groundborne vibration or groundborne noise levels?*

Construction

Potential vibration impacts associated with the projects are usually related to the use of heavy construction equipment. Construction can generate varying degrees of ground vibration, depending on the construction procedures and equipment. The use of construction equipment generates vibrations that spread through the ground and diminish with distance from the source. The effect on buildings in the vicinity of the construction site varies depending on soil type, ground strata, and receptor-building construction. The effects from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibrations at moderate levels, to slight structural damage at the highest levels. Vibration from construction activities rarely reaches the levels that can damage structures.

Table 16, *Project-Related Construction Vibration Damage Levels*, summarizes vibration levels for typical construction equipment at a reference distance of 25 feet. Typical construction equipment for this project can generate vibration levels ranging up to 0.21 in/sec PPV at 25 feet. Vibration levels at a distance greater than 50 feet would attenuate to 0.074 in/sec PPV or less.

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Table 16 Project-Related Construction Vibration Damage Levels

Equipment	Levels, PPV (in/sec)				
	FTA Reference at 25 Feet	Receptor to North 100 feet	Receptor to South 30 feet	Receptor to East 65 feet	Receptor to West 75 feet
Vibratory Roller	0.21	0.026	0.160	0.050	0.040
Hoe Ram	0.089	0.011	0.068	0.021	0.017
Large Bulldozer	0.089	0.011	0.068	0.021	0.017
Caisson Drilling	0.089	0.011	0.068	0.021	0.017
Loaded Trucks	0.076	0.010	0.058	0.018	0.015
Jackhammer	0.035	0.004	0.027	0.008	0.007
Small Bulldozer	0.003	0.000	0.002	0.001	0.001
Exceed 0.2 in/sec PPV Standard?		No	No	No	No

Source: FTA 2018. See Appendix C.

Note: Distance measurements were conducted using Google Earth (2025) from the boundary of work areas to the nearest receptors.

As shown in Table 16, the proposed construction activities would not exceed the 0.2 in/sec PPV FTA standard. In addition, the proposed project would not include any new operational vibration sources. Therefore, project-related vibration impacts would be **less than significant**.

- c) ***For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the proposed project expose people residing or working in the project area to excessive noise levels?***

The nearest airport to the project site, Fullerton Municipal Airport, is located approximately 4.5 miles to the west. The project site is located outside of 60 dBA CNEL noise contour for Fullerton Municipal Airport. Therefore, implementation of the proposed project would not result in increased exposure of people working at or visiting the project site to aircraft noise. Therefore, **no impact** would occur.

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XIV. Population and Housing

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

DISCUSSION

- a) ***Would the proposed project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?***

The proposed project would not increase student enrollment. It is expected that the students who would use the seismically retrofitted and modernized classrooms, as well as the improved athletic facilities, are existing residents living within the District's service boundary. The proposed project would not directly increase population growth in the area. No construction of homes or businesses is proposed, nor is the extension of roads or other off-site infrastructure required. Project implementation would not induce population growth and, therefore, **no impact** would occur.

- b) ***Would the proposed project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?***

Project construction would be restricted to the existing campus, and no housing would be displaced or necessitate replacement housing. **No impact** would occur.

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XV. Public Services

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☒	☐
Other public facilities?	☐	☐	☐	☒

DISCUSSION

- a) ***Would the proposed project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:***

Fire protection?

Fire protection and emergency services in the City of Fullerton, including the project site, are provided by the Fullerton Fire Department. The Fullerton Fire Department provides fire control and suppression, rescue, medical aid, hazardous materials control, and basic and advanced life support services (Fullerton 2025).

The closest Fullerton Fire Department fire station to the project site is Fire Station #5 at 2555 Yorba Linda Boulevard, approximately 0.75 miles northeast of the project site. Station # 3,

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approximately 1.1 miles south, can also provide fire protection and emergency services to the project site. The Fullerton Fire Department does not include online resources describing their personnel, equipment, call volume, and response time. The Fullerton Fire Department has an automatic aid agreement with the Orange County Fire Agency and the City of Placentia (Fullerton 2020b).

Construction

During the construction phase of the proposed project, there would be a temporary increase in construction workers on-site. Construction of the proposed project would be required to comply with the California Fire Codes (CFC) to ensure onsite safety during construction. The code includes standards for building and construction, requirements for emergency access, hazardous material handling, and fire protection systems. Construction of the proposed project would further implement Occupational Safety and Health Administrative (OSHA) regulations to ensure onsite safety during construction. Construction plans of the proposed project would be reviewed and inspected by the DSA to ensure all requirements are met, such as adequate emergency access to the project site during construction. The Fullerton Fire Department would review project plans to confirm fire personnel accessibility, fire hydrant locations and distribution, water supply requirements for fire flow, and automatic fire sprinklers.

Therefore, project construction would not affect fire/emergency response protection services to the extent that new or physically altered fire facilities would be needed to maintain acceptable service ratios, response times, or other performance objectives for fire protection services. Therefore, construction-related impacts on fire protection would be **less than significant**.

Operation

The proposed project would retrofit existing academic related buildings, construct interim portable classrooms, and provide improvements to the athletic fields, including field lighting and a new restroom and storage building. As discussed in Section 2.3, the District intends to host schoolwide assemblies at the track and field during school operating hours and would occur periodically throughout the school year, which may increase the demand for fire services. However, there are no other changes to operations (practices, games, or events), employees, and they would not increase student capacity or enrollment at TRHS. In addition, the proposed project would not result in the construction of new housing. The proposed project is not expected to result in a significant demand for fire service, since schoolwide assemblies would occur on campus and during school hours.

The proposed project would not alter the existing access and circulation features at the campus and project site, and such fire safety features have already been reviewed in accordance with the CFC. The proposed project would be designed to accommodate emergency access to the facility in accordance with the CFC. The fire department and DSA would review ensure that plans, specifications, and construction comply with access, fire, and life safety design standards

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established by DSA and California's building codes (Title 24 of the California Code of Regulations).

Although the proposed project may result in a minor increase in demand for fire protection services compared to existing conditions, it would not require new or substantially expanded fire protection facilities or personnel. Therefore, impacts would be **less than significant**.

Police protection?

The Fullerton Police Department (FPD) provides police protection services from its main station at 237 Commonwealth Avenue, approximately 2.1 miles southwest of the project site. FPD has approximately 180 employees, 125 sworn and 55 civilian positions. The FPD handles close to 50,000 calls for service annually (Fullerton 2025h).

Construction

During the construction of the proposed project, construction workers would temporarily be onsite. Construction of the proposed project would maintain emergency access and emergency egress routes during project construction. Active construction areas would be fenced during the construction phase, and construction site access would be limited to authorized personnel. The storage and staging of construction equipment would be fenced and occur on the project site.

Construction of the campus already includes several design features and security measures that would reduce the opportunity for criminal activity to occur onsite. For example, during construction, equipment and tools would be locked and hidden from view and fencing would be maintained around the perimeter of the project site; the project site includes security lighting and fencing and gates limiting access to the campus. The construction managers will be responsible for maintaining the safety and security of the project site and will maintain a list of contractors and key personnel with key access. The FPD and DSA would ensure the site adheres to CFC to ensure onsite safety during construction, and ensure all requirements are met, such as adequate emergency access to the project site during construction. The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities that would necessitate the need for new or physically altered police protection facilities. Construction related impacts on police protection would be **less than significant**.

Operation

The proposed project would retrofit existing academic related buildings, construct interim portable classrooms, and provide improvements to the athletic fields, including field lighting and a new restroom and storage building. As discussed in Section 2.3, the District intends to host schoolwide assemblies at the track and field during school operating hours and would occur periodically throughout the school year, which may increase the demand for fire services.

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However, there are no other changes to operations (practices, games, or events), employees, and would not increase student capacity nor enrollment at TRHS. The proposed project would not result in the construction of new housing. The proposed project is not expected to result in a significant demand in police service, since schoolwide assemblies would occur on campus and during school hours.

In addition, operation of the campus already includes several design features and security measures that would reduce the opportunity for criminal activity to occur onsite. For example, security lighting is installed throughout the campus and fencing and gates limit access to the campus and project site. The proposed project would be designed to accommodate emergency access to the facility in accordance with the federal, State and local regulations, and reviewed by DSA and the FPD for consistency. The proposed project would not result in substantial adverse physical impacts associated with the provision of new or physically altered police protection facilities that would necessitate the need for new or physically altered police protection facilities. The proposed project would have a **less than significant** impact on police protection services during operation of the proposed project.

Schools?

The proposed project includes retrofit existing academic related buildings, construct interim portable classrooms, and provide improvements to the athletic fields, including field lighting and a new restroom and storage building at the existing TRHS. Demand for schools is largely generated by new housing developments. The proposed project would serve existing students and would not generate an increase in student capacity nor enrollment at TRHS. Therefore, **no impacts** on schools would occur.

Parks?

Parks in the City are managed by the City of Fullerton Parks and Recreation Department. The Fullerton Parks and Recreation Department manages a total of 53 parks along with all trails and recreation facilities within the city (Fullerton 2025e). In addition, Ted Craig Regional Park within the City provides a 124-acre park with athletic fields, playgrounds, hiking trails, open space, walkways, picnic tables, park benches, a small lake, three year-round creeks, and a rose garden. The nearest park is Acacia Park, 0.3 miles north of the project site.

Typically, an increase in demand for parks is created by the development of new housing and/or population generating actions. The proposed project would retrofit existing academic related buildings, construct interim portable classrooms, and provide improvements to the athletic fields, including field lighting and a new restroom and storage building; and would not generate new students or housing that can increase the demand for parks. The proposed project would serve the existing needs of the campus. The proposed project would not increase the use of existing parks or recreational facilities, or the need for new parks or recreational facilities. The

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proposed project would continue to be available to authorized community groups during weekends and outside school hours, subject to District facility use policies and the Civic Center Act. Thus, the proposed project would provide improved recreational opportunities to the school and surrounding community and reduce the demand on neighborhood parks. A **less than significant** impact on parks would occur.

Other public facilities?

The Fullerton Public Library provides library services out of the main library and Hunt branch library provide library services, public events, college and career resources, computers and printing, ebook and eaudiobooks (Fullerton Library 2025). The main library at 353 Commonwealth Avenue is approximately 2.2 miles southwest of the project site. In addition, Fullerton residences are able to access Orange County Public Libraries which provides library services, a digital library, e-resource (online resources), workshops, public events, and other resources (OCPL 2025).

Typically, an increase in demand for library services is created by the development of new housing and/or population generating actions. The proposed project would retrofit existing academic related buildings, construct interim portable classrooms, and provide improvements to the athletic fields, including field lighting and a new restroom and storage building; and would not generate new students or housing that can increase the demand for parks. The proposed project would serve the existing needs of the campus. The proposed project would not increase the use of existing library facilities or the need for new library facilities. The proposed project would not require new or physically altered library facilities. **No impact** on libraries would occur.

XVI. Recreation

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐

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Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☒	☐

DISCUSSION

- a) ***Would the proposed project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?***

According to Section 5.15, Parks and Recreation, of the Fullerton Plan EIR, there are 640.4 acres of public parks and recreational facilities in the City. The City of Fullerton Parks and Recreation Department provides a wide range of recreational, sports, cultural, and senior programs, services, and events for all age groups and is responsible for maintaining the City's parks and recreation facilities. Specifically, the Fullerton Plan establishes a long-term goal to provide 4 acres of useable park area per 1,000 residents. Additionally, the City has entered into a number of agreements with the District for use of various school facilities for public recreation with use limited to after school hours, weekends, and summer programs (Fullerton 2012a).

The proposed project would consist of seismic retrofitting and modernization, interim portable classrooms, and athletic field improvements on the TRHS campus. As such, the proposed project would not induce population growth nor increase student enrollment or capacity on campus. Additionally, the proposed project includes enhanced sports facilities, which would be available to authorized community groups during weekends and outside school hours, subject to District facility use policies and the Civic Center Act. Therefore, the proposed project would not generate an increased demand for existing neighborhood, regional facilities or other recreational facilities and would not result in substantial physical deterioration of such facilities nor cause deterioration to accelerate. The proposed project would have **less than significant** impact on recreation.

- b) ***Does the proposed project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?***

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The proposed project is located on the existing TRHS campus. The proposed project would serve TRHS's existing student population and would not change the school's enrollment. Therefore, the proposed project would not include the development of recreational facilities nor require the expansion of existing recreational facilities since it does not affect student enrollment. A **less than significant** impact would occur.

XVII. Transportation

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

DISCUSSION

- a) ***Would the proposed project conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?***

Construction

Construction of the project would include large construction equipment, transportation of equipment to and from the project site, and worker vehicles. However, construction traffic would be temporary, and all construction activity and staging areas would be on the project site. Therefore, the proposed project would not obstruct traffic lanes or have any long-term effects on the circulation system.

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Operation

The proposed project would seismically retrofit existing academic related buildings, construct interim portable classrooms with potable restroom buildings, and provide improvements to the athletic fields, including field lighting and a new restroom and storage building. The proposed project would not increase student capacity nor enrollment at TRHS. As discussed in Section 2.3, *Project Characteristics*, schoolwide assemblies would be the only new event, and the proposed project would not result in any changes to the number of participants, time of year (season), or number of spectators for practices and games. Rather, the proposed project would expand access for existing uses and activities to athletic fields into the afternoon and evening hours. It's anticipated that the month of October would accommodate the highest number of late afternoon and evening field users with the new field lighting improvements, with an anticipated 375 players participating in sports after school during the peak PM hour. The proposed new bleachers are not considered in the trip generation forecasts, as the bleachers are intended to accommodate existing visitation, spectator activity, and school assemblies and would not generate new vehicle trips.

The trip generation for Troy High School after school activities is estimated using rates published in the ITE Trip Generation Manual 11th Edition (see Appendix D). The trips are based on rates for a high school (ITE Code 525). The project is expected to generate 53 trips during the peak PM hour, with 48% (25 vehicles) entering the site and 52% (28 vehicles) exiting the site. The trip generation and distribution forecast was used in this study to allocate project-generated traffic volumes for the PM peak hour to the adjacent intersections and street networks.

Since the proposed project is not anticipated to result in any changes to the daily number of practices or games, or to the number of participants or spectators, the average daily traffic (ADT) volumes for the study area roadway segments under Opening Year (2028) With Project conditions are not anticipated to change due to project conditions (see Table 17, *Estimated Project Average Daily Traffic Impacts*). An ambient growth rate of 1 percent per year was used to forecast the future volumes. Year 2028 traffic volumes were developed by applying an assumed 1% annual growth rate to Existing Year (2025) counts. Therefore, the increase in trips seen in Table 4 is representative of the ambient growth rate of 1 percent per year. Therefore, no significant weekday AM or PM peak hour impacts to traffic are anticipated, and impacts would be **less than significant**.

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Table 17 Estimated Project Average Daily Traffic Impacts

Roadway	Existing ADT	2028 No Project	2025 With Project	2028 With Project
Dorothy Lane, Between State College Boulevard and Victoria Drive	7,682	7,915	7,682	7,915
Victoria Drive, between Dorothy Lane and N Acacia Avenue	2,883	2,970	2,883	2,970
State College Boulevard, between Dorothy Lane and Nutwood Avenue	29,647	30,545	29,647	30,545
State College Boulevard, Between Dorothy Lane and Yorba Linda Boulevard	29,353	30,242	29,353	30,242

Source: Appendix D

Intersection Levels of Service (LOS)

An LOS analysis has been included for information only, to assess potential conflicts with local policies. VMT is the CEQA metric for determining the significance of transportation impacts. The volumes of traffic that would be generated by the proposed project were determined to estimate the impacts of the project on the study area streets and intersections.

ICU (Intersection Capacity Utilization) and HCM (Highway Capacity Manual) both present methods for analyzing intersection performance. ICU uses a volume-to-capacity (V/C) ratio to show whether an intersection is overcapacity or has reserve capacity. HCM leverages an average vehicle delay metric (i.e., control delay, measured in seconds per vehicle). In this study, the ICU method was applied to study the performance of signalized intersections, and the HCM method was applied to study the performance of unsignalized intersections. This approach is consistent with the City of Fullerton guidelines (Appendix D). The following LOS analysis is used to demonstrate consistency with the General Plan (Fullerton 2025f).

Traffic LOS is used to measure and contextualize intersection performance. LOS values are designated A through F, with LOS A representing free flow traffic conditions and LOS F representing severe traffic congestion (Appendix D). Based on the results of the LOS analysis, the proposed project for TRHS can be implemented without significantly impacting any of the study intersections or roadway segments. All study intersections are forecasted to operate at an acceptable level of service under both Existing Year (2025) and Opening Year (2028) With Project scenarios.

Transit, Roadway, Bicycle, and Pedestrian facilities

Existing site access points along Hale Avenue and Dorothy Lane would be maintained. Marked crosswalks are provided on Dorothy Lane at Victoria Drive to the west and State College

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Boulevard to the east. There is also an existing mid-block crosswalk between the west and central site access driveways. The traffic impact study identified no additional pedestrian or bicycle crossing locations are recommended (Appendix D). The project proposes using the southwestern parking lot to accommodate 20 interim portable classrooms and two interim portable restroom buildings during the seismic retrofitting and modernization construction phase. During this period, the District would provide alternative parking at the District-owned La Vista High School, adjacent to TRHS on the western side. The proposed project would adhere to the temporary recommendations found in the traffic impact study to ensure safety and travel times, such as: clearly delineating with temporary signage or markings the preferred pedestrian and/or bicycle paths from La Vista High School to Troy High School; and delineating preferred walking paths for students to enhance safety and travel times (Appendix D).

The proposed after-school activities would generate substantially fewer trips compared to a typical school day. As such, no impacts related to site access and on-site circulation are anticipated, and no permanent changes or improvements to site access are recommended based on this analysis. Therefore, impacts would be **less than significant**.

b) *Would the proposed project conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?*

On September 27, 2013, SB 743 started a process that fundamentally changed transportation impact analyses as part of CEQA compliance. SB 743 eliminated auto delay, LOS, and other similar measures of vehicular capacity or traffic congestion as the sole basis for determining significant impacts under CEQA. As part of the current CEQA Guidelines, the criteria “shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses” (Public Resources Code Section 21099(b)(1)). Pursuant to SB 743, the California Natural Resources Agency adopted revisions to the CEQA Guidelines on December 28, 2018, to implement SB 743. CEQA Guidelines Section 15064.3 describes how transportation impacts are to be analyzed after SB 743. Under the Guidelines, metrics related to “VMT” were required beginning July 1, 2020, to evaluate the significance of transportation impacts under CEQA for development projects, land use plans, and transportation infrastructure projects. State courts ruled that under the Public Resources Code Section 21099, subdivision (b)(2), “automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment” under CEQA, except for roadway capacity projects.

The proposed project is evaluated for potential impacts related to VMT consistent with the requirements contained in the City of Fullerton Transportation Assessment Policies and Procedures document. The guidelines establish that proposed projects with one or more of the following attributes may be exempt from a full VMT Analysis:

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- **Criteria 1:** Project is located in a Transit Priority Area (TPA). The project is within 0.5 miles of a TPA, which includes a major transit stop or an existing stop along a high-quality transit corridor.
- **Criteria 2:** Project is located in a Low VMT Area. A low VMT area is defined as an individual traffic analysis zone where total daily Origin/ Destination VMT per service population is 15% or more less than the City average total daily Origin/Destination VMT per service population.
- **Criteria 3:** Project Type Screening. Projects for the following land uses can be presumed to have a less than significant impact:
 - Local-serving K-12 public schools
 - Local-serving parks Day care centers
 - Local-serving retail uses less than 50,000 square feet
 - Local-serving hotels (e.g. non -destination hotels)
 - Local-serving student housing projects Local -serving assembly uses (places of worship, community organizations)
 - Community institutions (public libraries, fire stations, local government)
 - Affordable, supportive or transitional housing
 - Assisted living facilities
 - Senior housing (as defined by HUD)
 - Projects generating less than 836 daily VMT

The proposed project would be eligible to be screened out from the need for a full project level VMT analysis under the Criteria 3 screening attribute because the project is proposing development of local-serving K-12 public school. No additional VMT analysis is required for the project (Appendix D). Therefore, the project's impact on a VMT is anticipated to be **less than significant**.

c) *Would the proposed project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

The campus and project access and circulation are discussed in Section 2.2.2, *Parking and Access*. The existing driveways are designed to serve the typical school day traffic volumes and turning movements. The proposed project's after-school activities would generate a substantially lower number of vehicle trips compared to a typical school day. No changes to existing driveway lengths, pick-up/drop-off areas, or turning lanes would occur, and no impact is anticipated. As such, no substantial impacts to site access and circulation are anticipated.

The proposed project would make the southwestern parking lot temporarily unavailable for vehicle parking to accommodate 20 interim portable classrooms and two interim portable

3. ENVIRONMENTAL EVALUATION

restroom buildings during the seismic retrofitting and modernization construction phase. As such, vehicles accessing Troy High School using the driveway access along North Hale Avenue will only be able to turn left towards the northwestern parking lot upon entry. The proposed project would adhere to the temporary recommendations found in the traffic impact study to ensure safety and travel times, such as: clearly delineating with temporary signage or markings the preferred pedestrian and/or bicycle paths from La Vista High School to Troy High School; and delineating preferred walking paths for students to enhance safety and travel times (Appendix D). As such, proposed project substantially increase hazards due to a geometric design feature, and no permanent changes or improvements to site access are recommended based on this analysis. Therefore, impacts would be **less than significant**.

d) *Would the proposed project result in inadequate emergency access?*

Existing emergency access is provided via internal drive aisles from the two western parking lots, the main northeastern parking lot, and the driveway along State College Boulevard through the La Vista High School parking lot. The interim portable classrooms would be installed in four clusters: clusters 1 and 2 at the central part of the campus, where the existing blacktop basketball courts are, and clusters 3 and 4 at the southwestern parking lot, as the seismic retrofitting and modernization phase occurs.

To ensure adequate access for emergency vehicles and safety for students onsite new temporary fire lanes would connect to existing campus fire lanes. One would link the fire lane near the track and field to the basketball court area and to the central fire lane serving clusters 1 and 2. The second temporary fire lane would traverse through the center of the southwest parking lot to serve Clusters 3 and 4, provide access behind the varsity baseball field, and connect to the central fire lane. As seismic retrofitting and modernization are complete at each classroom building, students would be relocated back into their respective classroom buildings. Once the construction phase has concluded, the temporary fire lines would be removed. The interim portable classrooms and restroom buildings would be removed from the campus, and the parking lot and basketball courts would be returned to existing conditions, and the temporary fire lanes would be removed.

To ensure adequate emergency and fire access, project improvements would be designed in compliance with applicable DSA and CFC standards (e.g., minimum lane width and turning radius). The DSA would review plans, specifications, and construction to confirm compliance with fire and life safety standards, including roadway requirements for emergency vehicles. In addition, existing fire lanes and driveways to the campus have already been designed to meet applicable DSA and CFC standards and would continue to provide adequate access to all areas of the campus. Therefore, the project would not conflict with emergency access, and impacts would be **less than significant**.

3. ENVIRONMENTAL EVALUATION

XVIII. Tribal Cultural Resources

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☒	☒	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

DISCUSSION

- a) *Would the proposed project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*

3. ENVIRONMENTAL EVALUATION

- i) **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k)?**

As discussed under Section V(a), the project site or campus is not listed within the National Register of Historic Places, nor is eligibility for listing in the CRHR. Additionally, the Fullerton local register of historic places does not identify any historic resources or potential historic resources at the project site. The George G. Golleher Alumni House at California State University, Fullerton is the closest site listed within the Fullerton local register is approximately 0.25 miles northeast of the project site. The project would not impact local historical sources due to the distance. The Cultural Resource Evaluation Reports determined there are no potential “historical resources,” and no buildings, structures, features, or objects of prehistoric or historical origin were observed or identified in a records search within or adjacent to the project area (Appendix B). The project would not impact any structure or resource listed in the CRHR or in a local register of historical resources. Therefore, **no impact** would occur.

- ii) **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

A Sacred Lands File (SLF) search conducted by the Native American Heritage Commission (NAHC) returned a positive result, indicating the potential presence of Native American cultural resources, including sacred sites, within the project area (Appendix E). The NAHC recommended outreach to tribes with potential cultural affiliation to obtain additional information regarding the project area. The proposed project has the potential to disturb subsurface deposits that may be of traditional or cultural significance. Accordingly, Assembly Bill 52 (AB 52) tribal consultation was conducted as part of the proposed project.

AB 52 requires meaningful consultation with California Native American tribes on potential impacts to tribal cultural resources, as defined in PRC Section 21074. Tribal cultural resources are sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either eligible or listed in the California Register of Historical Resources or local register of historical resources. As part of the AB 52 process, Native American tribes must submit a written request to the District (lead agency) to be notified of projects within their traditionally and culturally affiliated area. The District must then provide written, formal notification to those tribes, and the tribe must respond to the lead agency within 30 days of receiving this notification if they want to engage in consultation on the project. When these steps are completed, the District must begin the consultation process within 30 days of receiving the tribe’s request.

3. ENVIRONMENTAL EVALUATION

Consultation concludes when either 1): the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached. Pursuant to AB 52, the Fullerton Joint Union High School District invited a total of 15 tribes to consult based on the District's AB 52 list, which includes the Agua Caliente Band of Cahuilla Indians, Gabrieleno Band of Mission Indians - Kizh Nation, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino /Tongva Nation, Gabrielino-Tongva Tribe, Juaneno Band of Mission Indians Acjachemen Nation – Belardes, Juaneno Band of Mission Indians, La Jolla Band of Luiseno Indians, Pala Band of Mission Indians, Pauma Band of Luiseno Indians, Pechanga Band of Luiseno Indians, Pechanga Band of Mission Indians, Rincon Band of Luiseno Indians, San Fernando Band of Mission Indians, San Luis Rey Band of Mission Indians, and Soboba Band of Luiseno . The invitation letters were sent to tribes on December 11, 2025, via mail to the available addresses, prior to the NHAC SLF positive result. No tribes requested to consult with the District regarding the proposed project. Tribal consultation pursuant to AB 52 concluded on January 11, 2026 for the proposed project.

In the unlikely event human remains are encountered during ground-disturbing activities the human remains would be treated in accordance with procedures and requirements in Sections 5097.94 and 5097.98 of the Public Resources Code; Section 7050.5 of the California Health and Safety Code; and CEQA Guidelines Section 15064.5.

Due to the potential of unearthing unknown TCRs, Mitigation Measure CUL-1 would ensure potential impacts to tribal cultural resources are minimized. Implementation of Mitigation Measure CUL-1 would require all ground disturbing activities to halt in the event cultural resources are encountered and allow a qualified archaeologist to excavate or contact the appropriate Native American tribal contact to excavate such resources, which would reduce potential impacts to archaeological resources to a level that is less than significant. Therefore, impacts would be **less than significant with mitigation measures**.

3. ENVIRONMENTAL EVALUATION

XIX. Utilities and Service Systems

Would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

DISCUSSION

- a) *Would the proposed project require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

3. ENVIRONMENTAL EVALUATION

The proposed project would seismically retrofit existing academic related buildings, construct interim portable classrooms with potable restroom buildings, and provide improvements to the athletic fields, including field lighting and a new restroom and storage building. The proposed project would not increase student capacity nor enrollment at TRHS. As discussed in Section 2.3, *Project Characteristics*, schoolwide assemblies would be the only new event, and the proposed project would not result in any changes to the number of participants, time of year (season), or number of spectators.

Water

The temporary portable restroom buildings and new restroom and storage building would serve existing students, practices and games already occurring on campus, notwithstanding the extended evening practices. In addition, schoolwide assemblies would occur during the school day, and students would utilize restrooms regardless of the schoolwide assemblies. Therefore, the proposed project is not expected to increase water demand.

Water is currently provided to the campus and project site by the City of Fullerton - Utilities Services Division (Fullerton 2021). Potable water would be provided to the new buildings through connections to the existing water mains. The proposed water system improvements would be designed and constructed in accordance with the CBC and CalGreen requirements, such as CALGreen Division 5.3, Water Efficiency and Conservation, including those of Sections 5.303, Indoor Water Use, and 5.304, Outdoor Water Use. As further discussed under Section XIX(b) below, the City has sufficient water capacity to serve the proposed project. The proposed project would not require the construction of new or expanded water facilities that could cause significant effects. Impacts would be **less than significant**.

Wastewater

The temporary portable restroom buildings and a new restroom and storage building would serve existing students, practices, and games already occurring on campus, notwithstanding the extended evening practices. In addition, schoolwide assemblies would occur during the school day, and students would utilize restrooms regardless of the schoolwide assemblies. Therefore, the proposed project is not expected to increase wastewater generated onsite.

Wastewater in the City and project site is conveyed for treatment to the Orange County Sanitation District (OC SAN) for treatment and disposal (Fullerton 2021). OC SAN has a system of gravity flow sewers, pump stations, and pressurized sewers to convey wastewater to two treatment plants: Fountain Valley (Plant No. 1) and Huntington Beach (Plant No. 2). Plant No. 1 has a primary and secondary capacity of 208 and 182 million gallons per day (MGD), respectively; Plant No. 2 has a primary and secondary capacity of 168 and 150 MGD, respectively (OC SAN 2022). The OC SAN has a total 2023-24 average daily flow of 192 MGD of wastewater (OC SAN 2025). As further discussed in Section XIX(c), the proposed project would not substantially increase wastewater. Wastewater generated by the proposed project will be

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conveyed to the existing sewer lines in the public right-of-way. Therefore, the proposed project would not require the construction of new or expanded wastewater facilities that could cause significant environmental effects. Impacts would be **less than significant**.

Stormwater Drainage

As substantiated in Section X(c), impacts would be **less than significant**, and no mitigation measures are necessary.

Electrical Power

Electricity is provided by Southern California Edison (SCE 2025). The proposed project would require utility trenching and connect to existing electric power infrastructure for operation. The proposed project would result in an increase in electricity consumption that would be adequately served by the existing infrastructure. The proposed project would be required to comply with energy efficiency standards set forth by the CBC and CALGreen requirements. Implementation of the proposed project would not result in the relocation or construction of new or expanded electricity facilities that could cause significant environmental impacts. Therefore, impacts would be **less than significant**.

Natural Gas

Natural gas service is provided by the Southern California Gas Company. The proposed project would not require the use of natural gas during construction nor operation of the proposed improvements, and therefore **no impact** would occur.

Telecommunications

The proposed project would not require additional telecommunications facilities demand. The proposed project would not require off-site construction or relocation of utilities, and therefore **no impact** would occur.

b) *Would the proposed project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

The City of Fullerton Urban Water Management Plan (UWMP) determined that there is adequate water supply to service the City through 2045 during normal years, single-dry years, and multiple-dry years (Fullerton 2021). The water supply till 2045 is projected to consist of approximately 85 percent groundwater, and the remaining water supplies are 15 percent imported water. In addition, the City has a purchase agreement with MET that allows the City to purchase significantly more imported water, should the need arise.

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As discussed in Section XIX(a), the proposed project is not expected to generate an increase in water demand, and any increases would be negligible. The proposed water system improvements would be designed and constructed in accordance with the CBC and CalGreen requirements, such as CALGreen Division 5.3, Water Efficiency and Conservation, including those of Sections 5.303, Indoor Water Use, and 5.304, Outdoor Water Use. Since the project would not create an increase in water demand, the City contains adequate water supplies to meet the water demands of the proposed project, and the City during normal, dry, and multiple dry years, and impacts would be **less than significant**.

c) *Would the proposed project result in a determination by the waste water treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

Wastewater generated at the campus is conveyed to OC SAN treatment plants No. 1 in Fountain Valley and No. 2 in Huntington Beach. Plant No. 1 has a primary and secondary capacity of 208 and 182 MGD, respectively, and Plant No. 2 has a primary and secondary capacity of 168 and 150 MGD, respectively (OC SAN 2022). The OC SAN has a total 2023-24 average daily flow of 192 MGD of wastewater, with a total of 376 MGD primary treatment capacity at Plant No. 1 and Plant No. 2 (OC SAN 2025). Thus, there is an approximate 184 MGD excess capacity at OC SAN.

As discussed in Section XIX(a), the proposed project is not expected to increase wastewater generated onsite, any increases in wastewater would be negligible. As such, OC SAN has adequate capacity to serve the proposed project in addition to the existing commitments. Therefore, impacts would be **less than significant**.

d) *Would the proposed project generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

During construction the proposed project would not generate demolition debris from clearance and waste debris. Construction solid waste generation would be minimal, since the construction would not require the demolition of buildings; however, during seismic retrofitting internal building debris would be created. In accordance with CalGreen Section 5.408, Construction Waste Reduction, Disposal, and Recycling, requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

The proposed project would not increase student capacity nor enrollment at TRHS, and schoolwide assemblies would be the only new event on campus which occurs during the school day. The proposed project's operational activities are not expected to generate increases in solid waste, any increases in solid waste would be negligible.

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Solid waste generated by the project site would be disposed of in landfills within Orange County, which include the Frank R. Bowerman Landfill and Olinda Alpha Landfill with remaining capacities of 160,896,082 cubic yards and 17,500,000 cubic yards, respectively (CalRecycle 2025). In addition, the proposed project's negligible increase in solid waste production would be within the remaining capacity of the area landfills. The proposed project would not adversely impact landfill capacity or impair attainment of solid waste reduction goals, and impacts would be **less than significant**.

e) *Would the proposed project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The District would continue to comply with federal, state, and local statutes and regulations related to solid waste, such as the California Integrated Waste Management Act and local recycling and waste programs. As discussed in Section XIX(d), the proposed project would generate minimal solid waste during construction, as the proposed project would not create demolition debris from clearance, and solid waste from operational uses would be a negligible increase. The District and its construction contractor would continue to comply with all applicable laws and regulations and make every effort to reuse and/or recycle the construction debris that would otherwise be taken to a landfill. CALGreen Section 5.408, Construction Waste Reduction, Disposal, and Recycling, requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. Therefore, the impacts would be **less than significant**.

XX. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐

3. ENVIRONMENTAL EVALUATION

Issues	Potentially Significant Impact	Less-than- Significant Impact with Mitigation Incorporated	Less-than- Significant Impact	No Impact
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

DISCUSSION

a) *Would the proposed project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The project site is within an urbanized residential area in the City of Fullerton and is developed with the existing TRHS academic related buildings, parking lot, and athletic fields. According to the Fullerton Safety Element Supplement, the project site and the surrounding area are not within a VHFHSZ and there are no areas within the City within a wildland urban fire interface or historic fire perimeter (Fullerton 2025b). The closest VHFHSZ is approximately 3 miles northwest of the project site.

The Emergency Operations Plan (EOP) is primarily responsible for informing the City's emergency management strategies. The EOP provides the planning basis for hazard identification, mitigation, preparedness, response, and recovery for emergency events such as fires, earthquakes, floods, pandemics, and terrorist activities. City preparedness activities focus on ensuring the City's Emergency Operations Center (EOC) is adequately supplied and staffed by trained personnel in the event of an emergency (Fullerton 2025b). The Office of Emergency Management helps the City and community prepare for and respond to natural and human-caused disasters by maintaining emergency plans and facilities, providing training and education, supporting disaster response and recovery, and coordinating with regional partners (Fullerton 2025g). The Office of Emergency Management oversaw the preparation of the City Local Hazard Mitigation Plan (LHMP) which identifies hazards and strategies to reduce risk and improve resilience, and it supports coordinated response and recovery (Fullerton 2025h).

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Although the City's EOP and LHMP are not publicly accessible online, the Fullerton Safety Element Supplement Exhibit 1 identifies potential evacuation routes in Fullerton. The campus or project site is not bound by a potential evacuation route; however, Chapman Avenue and State College Boulevard are two major arterial roadways identified as potential evacuation routes.

The proposed project would not physically impede the circulation network and roadways surrounding the project site or designated evacuation routes. The project would occur and be limited to the project site. The proposed project would be designed in accordance with the CBC and CFC, and the project design plans would be reviewed by the DSA. Fire suppression equipment specific to construction would be maintained on-site, in accordance with DSA, CBC, and CFC requirements. Additionally, project construction would comply with applicable existing regulations, safety standards, and, where applicable, manufacturer's specifications for the proper maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Therefore, the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. Impacts would be **less than significant**.

b) *Would the proposed project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

The project site is within an urbanized residential area in the City of Fullerton and is developed with the existing TRHS academic related buildings, parking lot, and athletic fields. The project site is relatively flat with a slight slope from west to east. The Fullerton Safety Element Supplement states that periodic episodes of Santa Ana winds can influence the spread and intensity of wildfires (Fullerton 2025b). However, the project site and surrounding area are not within a VHFHSZ, and there are no areas within the City in a wildland urban fire interface or historic fire perimeter (Fullerton 2025g). In addition, the proposed project would be designed in accordance with the CBC and CFC. Project design plans would also be reviewed by the DSA and Fullerton Fire Department. Fire suppression equipment specific to construction would be maintained on site. Additionally, project construction would comply with applicable existing regulations, safety standards, and, where applicable, manufacturer's specifications for the proper maintenance of mechanical equipment, handling and storage of flammable materials, and cleanup of spills of flammable materials. Therefore, the proposed project would not expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of wildfire due to slope, prevailing winds, and other factors. Impacts would be **less than significant**.

c) *Would the proposed project require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?*

3. ENVIRONMENTAL EVALUATION

The project site is in an urban area and is served by existing utility infrastructure, including water and power. Development of the proposed project would require new utility hook-ups to the existing utilities in the project site area. All utility lines would be underground. The proposed project would be designed and constructed in accordance with the CBC and the CFC. These project features would not exacerbate fire risk. Development of the proposed project would not require the installation of roads, fuel breaks, or emergency water sources. Therefore, the proposed project does not include the installation or maintenance of infrastructure that could exacerbate fire risk or result in temporary or ongoing impacts to the environment. Impacts would be **less than significant**.

d) *Would the proposed project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

The project site and the surrounding area are not within a VHFHSZ (Fullerton 2025b). As discussed in Section X, *Hydrology and Water Quality*, the project site is not within a FEMA-designated 100-year flood zone, and there are no nearby water bodies, streams, or other conditions that would result in flooding in the project site (FEMA 2025a). As discussed in Section VII, *Geology and Soils*, the project site has a very low landslide potential, and the nearest landslide zone is approximately 0.35 miles north of the project site (USGS 2025a, DOC 2025d).

Additionally, the project site is relatively flat with a slight slope from west to east. The project site has a low risk of post-fire slope instability or drainage changes. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. A **less than significant** impact would occur.

3. ENVIRONMENTAL EVALUATION

XXI. Mandatory Findings of Significance

Issues	Potentially Significant Impact	Less-than-Significant Impact with Mitigation Incorporated	Less-than-Significant Impact	No Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☐	☒	☐
c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

DISCUSSION

- a) ***Does the proposed project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?***

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As discussed in Sections IV, Biological Resources; V, Cultural Resources; VII, Geology and Soils; and XVIII, Tribal Cultural Resources, with the incorporation of mitigation measures the proposed project would result in less than significant impacts to biological resources (including nesting birds), paleontological resources, and cultural and tribal cultural resources. As discussed in Section IV, Biological Resources, although the project site is developed and contains limited vegetation for migratory species, nesting birds have the potential to occur on the project site, construction activities may impact the species if they are present on-site. Impacts to nesting birds (avian species) would be less than significant with the implementation of Mitigation Measures BIO-1.

As discussed under Sections V, VII, and XVIII, the project site has been previously disturbed by the existing campus and is within an urbanized areas of the City. Although the project site received a positive SLF result, since the project site has been previously disturbed, it is unlikely that buried TCR, archaeological and paleontological resources would be encountered. Nevertheless, Mitigation Measures CUL-1, and GEO-1 include processes to follow in the unlikely event that TCR, archaeological or paleontological resources are encountered. With incorporation of Mitigation Measures GEO-1 and CUL-1, impacts to TCR, paleontological and archaeological resources would be less than significant.

With identified mitigation measures, the proposed project would not have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal nor eliminate important examples of the major periods of California history or prehistory. **A less than significant impact would occur with the incorporation of mitigation measures.**

b) *Does the proposed project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)*

The potential for cumulative impacts occurs when the independent impacts of a given project are combined with the impacts of related projects in proximity to the project site that would create impacts that are greater than those of the project alone. The proposed project is part of the Districts implementation of its 2024 Facilities Master Plan with the approval of the Districts bond in November 2024. The FMP assesses existing facility conditions, community needs, and recommends improvements across the District’s campuses. As a top priority, the District proposes to install sports field lighting at the six high schools (Buena Park High School [HS], Fullerton HS, La Habra HS, Sonora HS, Sunny Hill HS, and Troy HS) and install bleachers and PA systems at Sonora HS, Sunny Hill HS, and TRHS. The need for the field lighting is prompted by the passage of SB 328, which requires high schools to start no earlier than 8:30 am. The later

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start affects sports activities unless the athletic fields and courts are lit for evening use. Further, the bleachers at the three campuses are needed so that the District can host schoolwide assemblies; and additional campus improvements at TRHS, Sonora, and Sunny Hills High School. Fullerton Union High School is the closest District project 1.65 miles west.

The projects at Fullerton Union, Sonora, and Sunny Hills would occur in one or multiple phases and may overlap. However, construction of each project will be executed individually and on different construction schedules. All construction equipment and activities will occur within the boundaries of each campus and will not extend to the other campuses. The proposed project and the other projects within the district do not include subterranean levels and do not include extensive earthwork. Given the distance between the campuses and construction timeline, the construction of the proposed project will not combine with the other projects to create a cumulative impact during construction. Similar to the proposed project, the other proposed District projects will serve their local community and not introduce new events/sports.

As discussed previously in this IS/MND, the proposed project would have no impact, a less than significant impact, or a less than significant impact with mitigation measures to aesthetics, agriculture and forestry resources, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, noise, population and housing, public services, recreation, transportation, tribal cultural resources, utilities and service systems, and wildfire. Similar to the proposed project, each District project would be required to conduct project specific analysis. Therefore, the proposed project will not combine with the other projects to create a cumulative impact during operation; and all impacts are individually limited and would not result in any cumulatively significant impact. Impacts would be **less than significant**, and no mitigation measures are required.

c) *Does the proposed project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

The proposed project would comply with applicable local, state, and federal laws governing general welfare and environmental protection. The implementation of required mitigation measures specified in this IS/MND would reduce impacts to less than significant. The proposed project would not directly nor indirectly, result in environmental effects that could cause substantial adverse effects on human beings. A **less than significant** impact would occur.

4. REFERENCES

- DOC (California Department of Conservation). 2025a, December 3 (accessed). California Important Farmland Finder. <https://maps.conservation.ca.gov/dlrp/ciff/>.
- _____. 2025b, December 3 (accessed). Williamson Act Contracts Web Map. <https://maps.conservation.ca.gov/dlrp/WilliamsonAct/>.
- _____. 2025c, December 8 (accessed). Alquist-Priolo Earthquake Fault Zones. <https://www.conservation.ca.gov/cgs/alquist-priolo>.
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