Notice of Exemption

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

San Diego County Clerk
1600 Pacific Highway, Suite 260
San Diego, CA 92101

From: Dehesa School District
4612 Dehesa Road
El Cajon, California 92019

Dehesa School Portable Building Replacement and Installation Project
Project Title

4612 Dehesa Road (Assessor's Parcel Numbers 516-020-03-00 and 516-030-36-00)
Project Location – Specific

Unincorporated Dehesa Community — **Project Location – City**

San Diego — **Project Location – County**

The Proposed Project would modernize the existing Dehesa School campus. The Project would include removing and replacing existing outdated portable structures, installing new portable classroom facilities, demolishing a residential structure on the campus, and implementing related site improvements.
Description of Nature, Purpose, and Beneficiaries of Project

Dehesa School District
Name of Public Agency Approving Project

Dehesa School District
Name of Person or Agency Carrying Out Project

Exempt Status:

☒ Categorical Exemption: Section 15301 (Class 1, Existing Facilities), Section 15304 (Class 4, Minor Alterations to Land), and 15314 (Class 14, Minor Additions to Schools)

Class 1 applies because the Proposed Project involves the replacement, removal, and minor alteration of existing facilities at an established public-school campus with negligible expansion of use. The Project includes demolition of outdated portable structures and installation of new portable facilities serving the same educational purposes within the existing developed site.

Class 4 applies because the proposed improvements would occur on previously disturbed land associated with an existing school campus and would involve minor grading, trenching, and site modifications. The Project would not require removal of any healthy, mature, scenic trees, and all disturbed areas would be restored with buildings, pavement, and landscaping.

Class 14 applies because the Project involves minor additions to an existing school within school grounds, including the installation of portable classrooms. The Project would result in a net increase of two classrooms below the threshold of ten classrooms and would not increase student capacity by more than 25 percent.

Additionally, none of the exceptions outlined in CEQA Guidelines Section 15300.2 apply to the Project.
Reasons why project is exempt

Bradley Johnson, Superintendent — **Lead Agency Contact Person**

619.444.2161 — **Area Code/Telephone**

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

Signature:  **Date:** May 14, 2026 **Title:** Superintendent

☒ Signed by Lead Agency ☐ Signed by Applicant

Categorical Exemption Evaluation Report

Dehesa School Portable Building Replacement and Installation Project
El Cajon, California

Prepared for

Dehesa School District
4612 Dehesa Road
El Cajon, California 92019

Prepared by

Terraphase Engineering Inc.
591 Camino De Le Reina, Suite 200
San Diego, California 92108

May 6, 2026

Project Number C098.002.005

File: rpt-Dehesa Bldg Repl and Install-C098-002-005-FTE

terraphase engineering

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Acronyms and Abbreviations

BMP	best management practices
CEQA	California Environmental Quality Act
CEQA Guidelines	PRC §§ 21000 et seq. and 14 CCR §§ 15000 et seq.
District	Dehesa School District
DMSA	Dehesa Method Sports Academy
Project	Dehesa School Portable Building Replacement and Installation Project, Dehesa Elementary School, 4612 Dehesa Road, El Cajon, California
SWRCB	California State Water Resources Control Board
Terraphase	Terraphase Engineering Inc.

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1 Introduction

This *Categorical Exemption Evaluation Report* provides an assessment of the Dehesa School District's (District) proposed Portable Classroom Project at Dehesa Elementary School (Project). This evaluation documents the Project's eligibility to be categorically exempt from expanded environmental review under the California Environmental Quality Act (CEQA) pursuant to PRC §§ 21000 et seq. and 14 CCR §§ 15000 et seq. (CEQA Guidelines).[1]

Project Title:	Dehesa School Portable Building Replacement and Installation Project
Lead Agency Name and Address:	Dehesa School District 4612 Dehesa Road El Cajon, California 92019
Contact Person and Information:	Bradley Johnson Superintendent (619) 444-2161 | bradley.johnson@dehesasd.net
Project Location:	4612 Dehesa Road El Cajon, California 92019
Project Sponsor's Name and Address:	Dehesa School District 4612 Dehesa Road El Cajon, California 92019
General Plan Designation:	Public/Semi-Public Facilities[2]
Zoning:	Agriculture (A70)[3]
Project Description:	The Project would modernize the existing Dehesa School campus by removing and replacing outdated portable structures, installing new portable classroom facilities, demolishing an existing residential structure on campus, and completing associated site improvements.
Surrounding Land Uses and Setting:	The Project site is within the existing Dehesa School campus which is developed with school facilities, a residential structure, landscaping, and maintained hillside terrain. The campus is surrounded by Dehesa Road on the south, low density single-family residences to the east and west, and undeveloped land and regional open space to the north.

[1] https://leginfo.legislature.ca.gov/faces/codes_displaySection.21000 and https://govt.westlaw.com/calregs/Document/I86CE9E295, respectively

[2] County of San Diego, *Crest–Dehesa Community Plan,* San Diego County General Plan, Accessed April 8, 2026, https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/GP/9-Crest%20Dehesa.pdf

[3] County of San Diego, "Zoning and General Plan Information Web Map," Accessed April 8, 2026, https://gis-portal.sandiegocounty.gov/arcgis/home/webmap/viewer.html?webmap=f1b69ba9d3dd4940b8d1efcc9dac2ac4

Agencies Whose Approval is Required: Dehesa School District is the CEQA Lead Agency with the principal responsibility for carrying out and approving the Project. The Project requires plan check review by the Division of the State Architect.

2 Project Location

The Project site is located on the Dehesa School campus at 4612 Dehesa Road in unincorporated San Diego County, east of El Cajon, California (Figure 1). The campus is on the north side of Dehesa Road, and regional access is via Interstate 8 approximately 5 miles to the north.

3 Environmental Setting

This section describes the existing environmental setting of the Project site, including current and surrounding land uses, and applicable land use and zoning designations.

3.1 Existing Uses

The Project site comprises 12.4 acres and is associated with San Diego County Assessor's Parcel Numbers 516-020-03-00 (12.38 acres) and 516-030-36-00 (1.02 acres). The property is on the north side of Dehesa Road on a hillside. The highest elevation is approximately 590 feet above mean sea level in the northeast corner, and the lowest elevation is approximately 510 feet above mean sea level along Dehesa Road.

Existing improvements are present on terraced building pads. As shown in Figure 1, school facilities are developed in the southeast portion of property and include permanent and portable buildings for classroom and administrative uses, outdoor recreational spaces, paved circulation areas, limited landscaping, and paved parking along the southern perimeter. A vacant modular residential structure installed in 2002 is present at the mid-western portion of the property. An access road on the western portion of the school building provides access to the residence and continues north of two sets of storm drain ditches to ground-mounted solar photovoltaic arrays in the mid-eastern portion of the property. Natural, undeveloped land is north of the residence, access road, and solar arrays.

The property operates two educational programs (Dehesa Elementary and Dehesa Method Sports Academy) and the District administration offices. Due to the rural area that it serves, both programs offer alternative learning choices including site-based learning, independent study, and distance learning. The Dehesa Method Sports Academy (DMSA) also offers sport-specific training for baseball, softball, soccer, and football at off-site locations. Dehesa Elementary School currently contains 17 classrooms and has an enrollment capacity of 427 seats. Due to the structure of the alternative learning programs, DMSA shares classrooms with Dehesa Elementary School. In the 2024–2025 school year,

Dehesa Elementary enrolled 399 students in grades K–8 and DMSA enrolled 428 students in grades K–12.[4]

3.2 Surrounding Uses

The Project site lies within the Dehesa Valley, which is characterized by low density rural residential uses and undeveloped land. Dehesa Road forms the southern boundary of the property, beyond which is agricultural use. The Sweetwater River is located approximately 0.5 miles southwest of the Project site. Low-density, rural single-family residences are east and west of the campus, and undeveloped land is to the north.

3.3 Land Use and Zoning

The Project site is located within unincorporated San Diego County and is designated as "Public/Semi-Public Facilities" under the County's General Plan Land Use Element, a classification intended to accommodate public and quasi-public uses such as schools, civic facilities, and community-serving institutions.[5] The existing development and long-standing use of the Project site as a public school campus is consistent with this land use designation. The Project site is in an A70 (Limited Agriculture) zoning district, which is intended to create and preserve areas intended primarily for agricultural crop production.[6]

Pursuant to California Gov. Code § 53094 et seq.,[7] the governing board of a school district may render local zoning ordinances inapplicable to school facilities. Accordingly, the District's Board of Education may exempt the Project from the zoning requirements of San Diego County, including the County Code of Regulatory Ordinances and Zoning Ordinance that may otherwise apply.

[5] County of San Diego, *General Plan Land Use Element*, accessed April 21, 2026, https://www.sandiegocounty.gov/content/dam/sdc/pds/docs/GP/Land-Use-Element.pdf.

[6] San Diego County Code of Regulatory Ordinances, Section 2700, Accessed April 24, 2026, https://codelibrary.amlegal.com/codes/san_diego/latest/sdzoning/0-0-0-13897

[7] https://leginfo.legislature.ca.gov/faces/codes_displaySection.53094



Legend

Project Site

Project Boundary

Imagery Source: Google Earth Pro (December 19, 2025)

N

Not To Scale

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CLIENT: Dehesa School District

PROJECT: Dehesa School Portable Classroom

PROJECT NUMBER: C117.002

Local Vicinity Map

FIGURE 1



Facing northeast from the western driveway/parking lot.
Note the two-story school building and terrain.

Source: Google. Street view image of Dehesa School
Google Earth Pro, 15 Apr. 2026.

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CLIENT: Dehesa School District

PROJECT: Dehesa School Portable Classroom

PROJECT NUMBER: C098.002

Photo of Dehesa School

FIGURE 2

4 Project Description

The Project consists of the modernization of the Dehesa School campus which includes the demolition of an existing residential structure, replacement of existing portable structures with new structures, installation of new additional portable structures, development of new paths of travel, and other related site work on developed areas of the campus. Figure 3 illustrates the proposed improvements.

4.1 Building Demolition and Site Preparation

The Project includes demolition and removal of the vacant residential structure located on the mid-western portion of the property. Once cleared, this area and the portion of the on-site driveway that provides access to the residence would be graded for use as the Project's construction staging area. Grading would also be completed for a new driveway and building pad for new portable classroom structures (see Section 4.2).

4.2 New Portable Classroom Construction

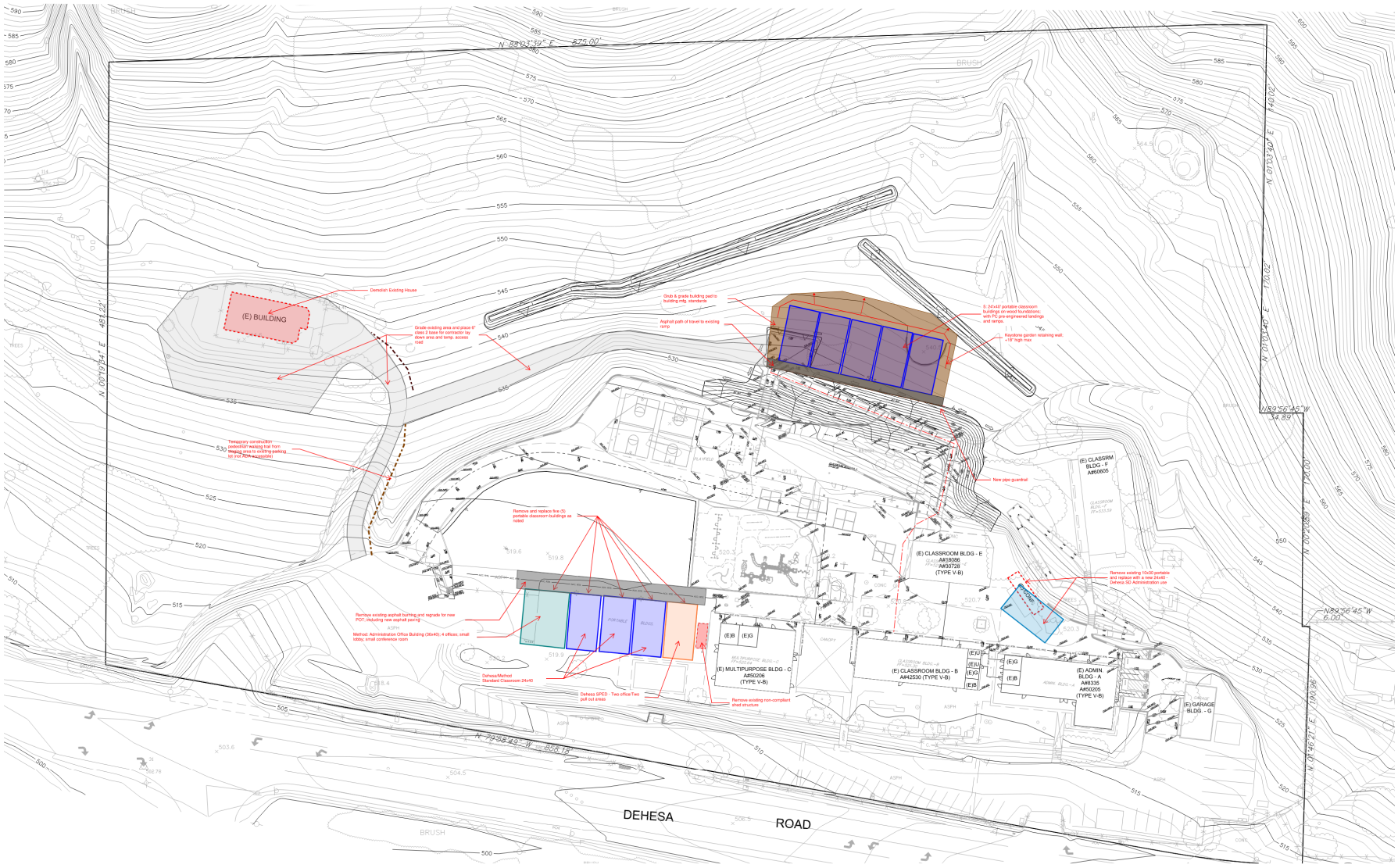
The Project includes the installation of five new portable classroom structures situated south of existing storm drains near the center of the property and north of the two-story school building, shown in the background of Figure 2. Prior to installation, the area designated for the proposed structures would be grubbed and graded for the development of a building pad suitable for the five portable units, each measuring 24 by 40 feet. The units would be set on wood foundations and connected to the campus' existing wet and dry utility systems, including but not limited to plumbing, electrical, fire alarm, and communication, on the southern portion of the campus.

The classroom units would be equipped with pre-engineered landings and ramps to facilitate access. A new path of travel would be installed on the south side of the classroom units, toward the existing campus. The walkway would have a guardrail and connect to the northwest corner of an existing ramp north and east of the two-story school building.

A 1.5-foot-tall keystone garden wall would be installed along the north, northeast, and northwest sides of the new building units. Vehicle access to the new classrooms would be via the service driveway that extends from the existing residence.

4.3 Existing Classroom Replacement and Repurposing

Five existing outdated portable buildings and a shed structure located in the southwest portion of the campus would be removed and replaced by five new portable buildings, which would be installed within the same footprint as the current portables. As part of this process, the existing asphalt berm positioned in front of the buildings would be removed, and the area would be regraded to accommodate a new path of travel. Of the five new portable buildings, one would be designated as the administrative office for the DMSA and another for special education offices. The remaining three buildings would be used as classrooms.



N

Source: Ruhnau Clarke Architects. March 10, 2026

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CLIENT: Dehesa School District

PROJECT: Dehesa School Portable Classroom

PROJECT NUMBER: C098.002

Site Plan

FIGURE 3

In the eastern portion of the campus, an existing 10- by 30-foot outdated portable building would be removed. This structure would be replaced with a new, larger 24- by 40-foot portable building that would be used for District office operations.

4.4 Site Operations

The Project would not affect the current use of the property as a public school campus occupied by the Dehesa Elementary and DMSA programs, as well as the District's administrative office. Operations related to both schools and administration would proceed in a manner consistent with existing operations. Students enrolled in the DMSA would continue to be bussed to off-site facilities for sports practices, games, and tournaments.

The Project would result in a net addition of two classrooms to the campus. Using state classroom loading factors,[8] the Project implementation would increase the campus's operating capacity from 427 seats to 485 seats, resulting in an increase of 58 seats.

4.5 Construction Schedule and Implementation

Construction activities for the Project are scheduled to begin shortly after June 5, 2026, which marks the last day of the school year. The initial phase would involve the demolition of the existing on-site residential structure and removal of the current portable classroom structures. Following these removals, the Project site would be prepared by grubbing and grading the building pad of the former residence, the access road serving both the residence and the new buildings, and the new building pad. Site preparation would ensure the area is ready to accommodate the planned construction activities and the installation of the new improvements.

The delivery of the prefabricated portable structures would occur in July 2026, after which the structures would be installed in the respective locations on the campus. The District anticipates substantial project completion—including the installation of paths of travel, connection of utilities, and installation of furniture—to be achieved by August 3, 2026. The timeline is intended to ensure the new classroom spaces are ready for use by the first day of school on August 12, 2026. Final site work and completion of all construction activities would occur by October 2026, at which point all improvements associated with the Project would be fully integrated into the campus.

4.6 Best Management Practices and Applicable Regulations

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

- **Construction Noise.** The District will adhere to San Diego County's construction work hours provided in the County Noise Ordinance (Title 3, Division 6, Chapter 4). Construction is permitted from

[8] Office of Public School Construction, January 2019, *School Facility Program Handbook*, Accessed April 10, 2026, https://www.dgs.ca.gov/-/media/Divisions/OPSC/Services/Guides-and-Resources/SFP_Hdbk_ADA.pdf

Monday through Saturday between 7 a.m. and 7 p.m. and will not occur on Sundays or federal holidays.[9]

- **Migratory Bird Treaty Act.** To avoid potential direct and/or indirect impacts to active bird nests, the District will comply with the federal Migratory Bird Treaty Act[10] and California Fish and Game Code[11] and conduct preconstruction clearance surveys, prior to ground disturbance, as follows:
  - If construction commences during the bird breeding season (February 15–September 15), a qualified biologist must be retained to conduct a nesting bird survey. To ensure there are no impacts to nesting birds, a qualified biologist shall conduct a general nesting bird survey prior to initial ground disturbance or site staging and no more than 3 days prior to construction activities. If nests are found, an avoidance buffer should be established (100 feet for passerines and 300 feet for raptors) until the biologist has determined that the young have fledged and the nest is no longer active.
- **Clean Water Act.** The National Pollutant Discharge Elimination System Program is a federal program which has been delegated to the California State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards. As the construction area is greater than 1 acre, the District would be required to comply with the SWRCB's Construction General Permit (Order No. 2022-0057-DWQ).[12] This permit requires the District and its construction contractor to prepare a Stormwater Pollution Prevention Plan, which would identify BMPs to be implemented during all construction activities to control and reduce pollutants from discharging to downstream waterways. The BMPs may include those from the California Stormwater Quality Association *Construction BMP Handbook* and would address erosion control, perimeter control, wind erosion control, storm drain inlet protection, tracking control, and general site management. The BMPs may include silt fencing, installation of gravel bag barriers, protection of catch basin inlets, and stabilization of the construction entrance/exit point. Adherence to the Stormwater Pollution Prevention Plan would reduce potential effects of Project construction on water quality to acceptable standards.
- **Clean Air Act.** Under federal and state law, the California Air Resources Board oversees the compliance of the federal Clean Air Act through State Implementation Plans. Local districts, including the San Diego Air Pollution Control District, enforce air pollution regulations. These

[9] San Diego County, Planning & Development Services., Noise Regulations, Accessed on April 16, 2026. https://www.sandiegocounty.gov/content/sdc/pds/ce5/home/noise-regulations.html

[10] United States. *16 U.S.C. § 703: Taking, Killing, or Possessing Migratory Birds Unlawful*. 2020. Accessed April 28, 2026. https://www.govinfo.gov/content/pkg/USCODE-2020-title16/pdf/USCODE-2020-title16-chap7-subchapII-sec703.pdf

[11] California Legislature. *California Fish and Game Code*. §§ 3503, 3503.5, 3513. Accessed April 28, 2026. https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=FGC&sectionNum=3503 https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=3503.5&lawCode=FGC https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=FGC&sectionNum=3513

[12] California State Water Resources Control Board, 2022, *Order No. 2022-0057-DWQ, Construction Stormwater General Permit*, Accessed April 24, 2026, https://www.waterboards.ca.gov/water_issues/programs/stormwater/construction/docs/2022-0057-dwq-with-attachments/cgp2022_order.pdf

regulations are primarily meant to ensure that the surrounding (or ambient) air meets federal and state air quality standards, which would also reduce potential impacts to water quality.[13]

- **Rule 50 (Visible Emissions):** Establishes limits to the opacity of emissions within the San Diego Air Pollution Control District.
- **Rule 51 (Nuisance):** Prohibits emissions that cause injury, detriment, nuisance, or annoyance to the public or that endanger public comfort, repose, health, or safety, or cause damage to business or property.
- **Rule 52 (Particulate Matter):** Establishes limits to the discharge of any particulate matter from nonstationary sources.
- **Rule 54 (Dust and Fumes):** Establishes limits to the amount of dust or fumes discharged into the atmosphere in any single hour.
- **Rule 55 (Fugitive Dust Control):** Limits generating fugitive dust emissions:

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

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

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

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

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

[13] San Diego County Air Pollution Control District, *Rules and Regulations*, Accessed April 24, 2026, https://www.sdapcd.org/content/sdapcd/rules.html

5 Limitations

This section evaluates whether the Project meets the requirements of one or more classes of projects which have been determined, under CEQA, not to have a significant effect on the environment and which therefore would be exempt from extended environmental review (14 CCR §§ 15000–15387). Specifically, this section assesses whether the Project qualifies for a categorical exemption under Class 1, Existing Facilities; Class 4, Minor Alterations to Land; and Class 14, Minor Additions to Schools.

5.1 Class 1 – Existing Facilities

> CEQA Guidelines § 15301 (Class 1) provides an exemption for the operation, repair, maintenance, permitting, leasing, licensing, or minor alterations of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of existing or former use. The key consideration is whether the project involves negligible or no expansion of use. Existing facilities under Class 1 include the demolition and removal of individual small structures, including a single-family residence and accessory (appurtenant) structures (§ 15301[l]).

The Project involves maintenance and minor alterations of an existing public educational facility. The District proposes replacement of existing outdated portable structures used for administrative and instructional purposes with new portable structures that would meet current programming needs; minor alterations of topographical features, including grubbing and grading for a driveway, paths of travel, and building pads (exempt under Class 4 – Minor Alterations of Land); installation of new classroom buildings that would involve negligible expansion of use (exempt under Class 14 – Minor Additions to Schools); and demolition and/or removal of a vacant residential unit and a shed that are appurtenant to the existing facility. The Project would result in a negligible expansion of use at the Project site. Therefore, the Project meets the requirements of the Class 1, Existing Facilities, categorical exemption.

5.2 Class 4 – Minor Alterations to Land

> CEQA Guidelines § 15304 (Class 4) provides an exemption for minor public or private alterations in the condition of land, water, and/or vegetation which do not involve removal of healthy, mature, scenic trees except for forestry or agricultural purposes. Examples include minor trenching and backfilling where the surface is restored.

Implementation of the Project would require minor alterations to disturbed land that is developed with a public educational facility. Implementation of the Project would alter the land with additional grading for a driveway, building pads, and paths of travel. All disturbed areas would be improved and restored with new buildings, pavement, and landscaping that would stabilize the site for its reuse as an educational facility. The Project would not require removal of any healthy, mature, scenic trees. Therefore, the Project meets the requirements of a Class 4, Minor Alterations to Land, categorical exemption.

5.3 Class 14 – Minor Additions to Schools

> CEQA Guidelines § 15314 (Class 14) provides an exemption for minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25 percent or ten classrooms, whichever is less. The addition of portable classrooms is included in this exemption.

The Project involves additions to an existing public school within existing school grounds, including the replacement of six outdated portable structures with new portable structures, conversion of three existing classrooms to non-classroom uses, and installation of five new portable classroom units. The new structures would be used by the existing Dehesa Elementary and DMSA programs operating at the site.

Implementation of the Proposed Project would increase the total number of classrooms from 17 to 19, representing a net increase of 2 classrooms (see Appendix A), which is well below the 10-classroom threshold under 14 CCR § 15314.[14]

Using the state classroom loading factors,[15] the enrollment capacity of the campus would increase from 427 seats to 485 seats. The additional 58 seats would represent an increase of 14 percent, which is below the threshold of 25 percent. Therefore, the Project would meet the enrollment capacity limit of 14 CCR § 15314.

6 References

CEQA Guideline 14 CCR § 15300.2[16] identifies exceptions that would preclude the use of a categorical exemption for a project. These exceptions apply where there is a reasonable possibility that a project may have a significant effect on the environment due to one or more of the following circumstances:

1. **Location.** Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located. A project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply to all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.
2. **Cumulative Impact.** All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place over time is significant.

[14] "Minor Additions to Schools," 14 CCR § 15314, https://shared-govt.westlaw.com/calregs/Document/I8D1DC2BA5

[15] Office of Public School Construction, January 2019, *School Facility Program Handbook*, Accessed April 10, 2026, https://www.dgs.ca.gov/-/media/Divisions/OPSC/Services/Guides-and-Resources/SFP_Hdbk_ADA.pdf

[16] "Exceptions," 14 CCR § 15300.2, https://govt.westlaw.com/calregs/Document/I8CBBF3A85

3. **Significant Effect.** A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.
4. **Scenic Highways.** A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to trees, historic buildings, rock outcroppings, or similar resources) within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified Environmental Impact Report.
5. **Hazardous Waste Sites.** A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to California Gov. Code § 65962.5.[17]
6. **Historical Resources.** A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

The following analysis evaluates the applicability of these exceptions to the Project to determine whether any would disqualify the use of the identified categorical exemptions.

6.1 Location (14 CCR § 15300.2(a))

> Does the project qualify for a categorical exemption under Classes 3, 4, 5, 6, or 11, and is its location on an environmental resource of hazardous or critical concern that is designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies?

The Project relies on categorical exemption Classes 1, 4, and 14. Class 4 is qualified by consideration of designated, mapped, and officially adopted environmental resources of hazardous and critical concern. Following the California Supreme Court's general rule that CEQA does not apply to impacts of the environment on the project (*California Building Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369), the evaluation for this exception would be whether the Project would impact existing environmental resources.

The location of the Project is in an area with potentially sensitive biological resources. The District retained a qualified biologist to prepare an analysis on whether the Project would impact biological resources (see Appendix B). As provided in the letter report, the areas identified for proposed improvements at the Project site are disturbed and not within an environmentally sensitive area. The Project implementation would not impact sensitive environmental resources; therefore, this exception under 14 CCR § 15300.2(a) is not applicable.

[17] https://leginfo.legislature.ca.gov/faces/codes_displaySection.65962.5

6.2 Cumulative Impact (14 CCR § 15300.2(b))

> Is the project part of successive projects of the same type and in the same place, over time that could cause an impact that is significant?

Under 14 CCR § 15300.2(b), a categorical exemption shall not be used where the cumulative impact of successive projects of the same type in the same place over time is significant. The District does not currently have any plans for any other projects at the Project site. The District has initiated development of a Facilities Master Plan for the Dehesa School campus; however, neither the Facilities Master Plan nor improvements identified therein have been approved.

While the Facilities Master Plan is currently under development by the District, the Project is independent of that effort, is limited in scope, and would be completed by October 2026, prior to the likely approval of the Facilities Master Plan. Therefore, the environmental effects of the Project would not combine with those of the Facilities Master Plan. No cumulative impact would occur, and the exception under 14 CCR § 15300.2(b) is not applicable to the Project.

6.3 Significant Effects from Unusual Circumstances (14 CCR § 15300.2(c))

> Is there a reasonable possibility that the project would have a significant effect on the environment due to unusual circumstances?

In determining whether the exception for unusual circumstances under 14 CCR § 15300.2(c) applies, two separate issues must be considered. First, it must be established whether the Project involves unusual circumstances. Second, if unusual circumstances are present, it must be evaluated whether there is a reasonable possibility that these circumstances would lead to a significant effect on the environment. This approach is guided by the California Supreme Court's decision in *Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1104.

The Project entails the modernization of an existing school campus, including the installation of new portable building structures and related site improvements. Such activities are standard for school campus upgrades and are consistent with the development types and scales anticipated under 14 CCR § 15314 (Class 14). The areas designated for development have been previously disturbed, and the Project does not involve expanding the campus footprint, changing the existing land use designation, or introducing new uses beyond the continued operation of the property as an educational institution. The scope of development, which features the addition of portable classrooms and a modest increase in student capacity, aligns with the existing campus environment and does not constitute an atypical intensification of use. Construction activities will be limited and managed to minimize disruption to ongoing school operations.

No unique site conditions or unusual project characteristics have been identified that would set the Project apart from other similar school improvement initiatives. Given that the Project does not exhibit unusual circumstances relative to other projects qualifying for categorical exemption, there is no

reasonable possibility that it would result in any significant environmental effects due to unusual circumstances. Therefore, the exception specified in 14 CCR § 15300.2(c) does not apply.

6.4 Scenic Highway (14 CCR § 15300.2(d))

> Would the project result in damage to scenic resources including but not limited to, trees, historic buildings, rock outcroppings or similar resources, within a highway officially designated as a State scenic highway?

Under 14 CCR § 15300.2(d), a categorical exemption cannot be applied to projects that may cause damage to scenic resources located within a highway that has been officially designated as a State Scenic Highway.

The Project is not situated within or adjacent to any highway that is officially designated as a State Scenic Highway. The closest designated State Scenic Highway is State Route 125, which lies approximately 10 miles to the west of the Project site.[18] There are intervening rural and developed areas separating the Project site from State Route 125, and the Project site is not visible from the highway corridor. All activities associated with the Project would occur within the existing boundaries of the Dehesa School campus. As a result, the Project would not remove scenic resources or affect views from a designated State Scenic Highway; therefore, the scenic resources exception outlined in 14 CCR § 15300.2(d) is not applicable.

6.5 Hazardous Waste Sites (14 CCR § 15300.2(e))

> Is the project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code?

California Gov. Code § 65962.5, commonly referred to as the "Cortese List," identifies locations of hazardous materials release sites compiled by various State agencies.[19] The Cortese List is comprised of several databases maintained by the California Department of Toxic Substances Control (DTSC), the SWRCB, and other regulatory agencies, including the DTSC EnviroStor database, the SWRCB GeoTracker database, and lists of hazardous waste facilities and solid waste disposal sites:

- DTSC:
  - EnviroStor: List of hazardous waste and substances sites.[20]

[18] California Department of Transportation, *California State Scenic Highway System Map*, Accessed April 10, 2026, https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aacaa

[19] California Environmental Protection Agency, "Cortese List Background and History," https://calepa.ca.gov/sitecleanup/corteselist/background/

[20] DTSC, EnviroStor, Accessed April 7, 2026. https://www.envirostor.dtsc.ca.gov/public/

  - List of hazardous waste facilities subject to corrective action pursuant to HSC § 25187.5.[21]
- SWRCB:
  - GeoTracker: List of leaking underground storage tank sites.[22]
  - Solid Waste Assessment Test: List of solid waste disposal sites with waste constituents exceeding hazardous waste levels outside the permitted waste management unit.[23]
  - 2026 Cortese List - Site Cleanup Program: List of "active" Cease and Desist Orders and Cleanup and Abatement Orders.[24]

A search of Cortese List sources indicates that the Project site is not included on any list of hazardous materials sites compiled pursuant to 14 CCR § 65962.5.

The Project is located on an existing developed school campus, and the Project implementation would not involve activities that would result in the release of hazardous materials beyond those typical of demolition and construction activities. Any materials encountered during demolition and site preparation would be handled and disposed of in accordance with applicable federal, state, and local regulations.

Based on the Cortese List database review and the limited scope of the Project, there is not a reasonable possibility that the Project would result in a significant effect on the environment due to hazardous waste or hazardous substances. Therefore, the exception to categorical exemptions in 14 CCR § 15300.2(e) does not apply.

6.6 Historical Resources (14 CCR § 15300.2(f))

> Would the project cause a substantial adverse change in the significance of a historical resource?

Under 14 CCR § 15300.2(f), a categorical exemption shall not be used for a project that may result in a substantial adverse change in the significance of a historical resource. The Project site is not listed on the National Register of Historic Places, California Historical Resources, California Historical Landmarks,

[21] DTSC, *Hazardous Waste and Substances Site List (Cortese List),* EnviroStor database, Accessed April 10, 2026, https://dtsc.ca.gov/dtscs-cortese-list/

[22] CSWRCB, *GeoTracker Map,* Accessed April 10, 2026, https://geotracker.waterboards.ca.gov/

[23] California Environmental Protection Agency, *Sites Identified with Waste Constituents above Hazardous Waste Levels Outside the Waste Management Unit (Solid Waste Disposal Sites),* April 16, 2026, https://calepa.ca.gov/wp-content/uploads/2026/02/CorteseList-Solid-Waste-Facilities_2026.pdf

[24] California Environmental Protection Agency. *Cortese List Data – Site Cleanup Program Sites with Latitude and Longitude,* March 2026, https://calepa.ca.gov/wp-content/uploads/2026/03/2026_scp_cortese.list_lat.long_.pdf

or California Office of Historic Preservation's Built Environment Resource Directory.[25] Additionally, the Project site is also not included on San Diego County's inventory of known historic resources.[26]

Therefore, the Project implementation, including the proposed removal of existing portable building structures and demolition of vacant single-family residence built in 2002 and shed, would not cause a change in the significance of a historical resource, and the exception for historical resources under 14 CCR § 15300.2(f) does not apply.

7 Conclusions

Based on the analysis above, the Project qualifies for a categorical exemption under CEQA. The Project satisfies the criteria for:

- Class 1, Existing Facilities (14 CCR § 15301), for the proposed maintenance and minor alterations of existing educational facilities that would result in a negligible expansion of use;
- Class 4, Minor Alterations to Land (14 CCR § 15304), related to the disturbance of land from construction efforts and for implementation of the proposed improvements; and
- Class 14, Minor Additions to Schools (14 CCR § 15314), for additional classrooms and other improvements at the existing school campus that would not increase the number of classrooms by 10 or increase the enrollment capacity 25 percent.

The Project was also evaluated for the applicability of the exceptions to categorical exemptions set forth in 14 CCR § 15300.2. As discussed in this evaluation, the Project is not located in and does not impact designated environmental resources , would not contribute to a significant cumulative impact, and does not involve unusual circumstances that would create a reasonable possibility of a significant environmental effect. The Project would also not damage scenic resources within a designated State Scenic Highway and would not cause a substantial adverse change in the significance of a historical resource. Additionally, the Project site is not included on any list of hazardous materials sites compiled pursuant to California Gov. Code § 65962.5.

Accordingly, the Project is appropriately exempt from further environmental review under CEQA.

[25] National Park Service, "National Register of Historic Places Database and Research," accessed April 21, 2026, https://www.nps.gov/subjects/nationalregister/database-research.htm#table; California Office of Historic Preservation, "California Historical Resources Inventory," accessed April 21, 2026, https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=19.; California Office of Historic Preservation, "California Historical Landmarks," accessed April 21, 2026, https://ohp.parks.ca.gov/?page_id=21478; California Office of Historic Preservation, "Built Environment Resource Directory," accessed April 21, 2026, https://ohp.parks.ca.gov/?page_id=30338.

[26] County of San Diego. Historic Property List. Accessed April 24, 2026. https://www.sandiegocounty.gov/content/dam/sdc/pds/hsb/San%20Diego%20County%20Historic%20Property%20Listing%202026%20for%20Website.xlsx

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Appendix A

Existing and Proposed Classroom Count and Enrollment Capacity

Dehesea School District

Program

Existing Capacity — Description	Number of Rooms/Teaching Stations	State Loading Factor per Classroom	Total Student Load - State Loading	Remarks
Classrooms Prior to June 2026				
Early Education				
Transitional Kindergarten (TK) Classroom	1	24	24	Building B01
Kindergarten Classroom	1	24	24	Building B02
General Education				
Grades 1-6 Classroom	3	25	75	Building D01,02,03
Grades 1-6 Classroom	2	25	50	Building E01,02
Grades 1-6 Classroom	2	25	50	Building F05,06
Grades 1-6 Classroom	1	25	25	Building H07*
Grades 1-6 Classroom	1	25	25	Building H08*
Grades 1-6 Classroom	1	25	25	Building H09*
Grades 1-6 Classroom	1	25	25	Building H10*
Grades 1-6 Classroom	1	25	25	Building H11*
Grades 7-8 Classroom	2	27	54	Building D06,07
Specialty				
Green Room				Building B03
Conference Room				Building D04
School District Offices				Building F* (No Rm #)
Science Lab	1	25	25	Building D08
Classrooms Sub-total Existing Classrooms	***17***		***427***	

Future Capacity — Description	Number of Rooms/Teaching Stations	State Loading Factor per Classroom	Total Student Load - State Loading	Remarks
Classrooms After to June 2026				
Early Education				
Transitional Kindergarten (TK) Classroom	1	24	24	Building B01
Kindergarten Classroom	1	24	24	Building B02
General Education				
Grades 1-6 Classroom	3	25	75	Building D01,02,03
Grades 1-6 Classroom	1	25	25	Building E01
Grades 1-6 Classroom	2	25	50	Building F05,06
Grades 1-6 Classroom	1	25	25	Building H08**
Grades 1-6 Classroom	1	25	25	Building H09**
Grades 1-6 Classroom	2	25	50	Building I03,04
Grades 7-8 Classroom	2	27	54	Building D06,07
Grades 7-8 Classroom	1	27	27	Building E02
Grades 7-8 Classroom	3	27	81	Building I01,02, 05
Specialty/Repurposed Old Classrooms				
Green Room				Building B03
Conference Room				Building D04
Science Lab	1	25	25	Building D08
School District Offices				Building F** (No Rm #)
Special Education Offices/Learning Spaces				Building H07**
Storage				Building H10**
DMSA Offices				Building H11**
Total Classrooms	***19***		***485***	
Percent Change			*14%*	

* Buildings to be Removed
** Replacement Buildings

5/4/2026 DRAFT; 5/6/2026 REV
C Brown, Director, MGT Impact Solutions

Appendix B

Biological Reconnaissance Letter Report

ALDEN ENVIRONMENTAL, INC
3245 University Ave, #1188 | San Diego, CA 92104 | **Phone/Fax:** 619.284.3815

May 7, 2026

Mr. Bradley Johnson
Superintendent, Dehesa School District
4612 Dehesa Road
El Cajon, California 92019

Subject: Dehesa School Portable Building Replacement and Installation Project

Dear Ms. Wu Heyman:

This report describes existing biological conditions on the proposed Dehesa School Portable Building Replacement and Installation Project (project) site. This report provides the Dehesa School District (District) with information necessary to assess impacts to biological resources under the California Environmental Quality Act (CEQA). The District is the lead agency with the principal responsibility for carrying out and approving the project under CEQA.

PROJECT LOCATION

The approximately 13.3-acre Study Area encompasses the Dehesa School property and proposed development limits at 4612 Dehesa Road in the unincorporated County of San Diego (County), California (Figures 1 and 2).

PROJECT DESCRIPTION

The proposed project consists of modernization improvements to the Dehesa School campus, including demolition of an existing vacant residential structure and several outdated portable buildings, installation of new portable classroom and office structures, and associated site improvements within previously developed portions of the campus. Project components include site grading, construction of building pads and access improvements, installation of new paths of travel and accessibility features, utility connections, and related infrastructure improvements. Five new portable classroom buildings would be constructed near the center of the campus, while additional new portable structures would replace existing portable buildings in the southwestern and eastern portions of the campus for continued classroom, administrative, special education, and district office uses. Associated improvements include retaining walls, ramps, walkways, driveway modifications, and other ancillary site work to support campus operations and accessibility.

REGULATORY CONTEXT

Federal Government

Endangered Species Act

The Federal Endangered Species Act (FESA) designates threatened and endangered animals and plants and provides measures for their protection and recovery. "Take" of listed animal species and of listed plant species in areas under federal jurisdiction is prohibited without obtaining a federal permit. Take is defined as "to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or attempt to engage in any such conduct." Harm includes any act that actually kills or injures fish or wildlife, including significant habitat modification or degradation that significantly impairs essential behavioral patterns of fish or wildlife. Activities that damage the habitat of (i.e., harm) listed wildlife species require approval from the USFWS for terrestrial species.[1]

The FESA also generally requires the determination of Critical Habitat for listed species. If a project involves a federal action potentially affecting Critical Habitat, the federal agency would be required to consult with USFWS. If a proposed project would result in direct or indirect impacts to designated Critical Habitat for a federally listed species, and there is a federal nexus (such as federal funding, permitting, or authorization), a consultation with the USFWS may be required under Section 7 of the FESA. Such a consultation would ensure that the proposed action is not likely to destroy or adversely modify the designated Critical Habitat or jeopardize the continued existence of the listed species in question.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA; 16 U.S. Code Sections 703-711) includes provisions for the protection of migratory birds, including the non-permitted take of migratory birds. The MBTA regulates or prohibits taking, killing, possession of, or harm to migratory bird species listed in Title 50 Code of Federal Regulations Section 10.13. Migratory birds include geese, ducks, shorebirds, raptors, songbirds, and many others (including those that are not sensitive; see Section 4.5.3 of this report for an explanation of which species are sensitive). Disturbance that causes nest abandonment and/or loss of reproductive effort (killing or abandonment of eggs or young) is considered a "take." The MBTA is an international treaty for the conservation and management of bird species that migrate through more than one country, and is enforced in the United States by the USFWS. The MBTA was amended in 1972 to include protection for migratory birds of prey (raptors).

[1] The U.S. Fish and Wildlife Service and the National Marine Fisheries Service are proposing to rescind the regulatory definition of ''harm'' in Endangered Species Act (FESA) regulations. The agencies believe the existing regulatory definition of ''harm,'' which includes habitat modification, runs contrary to the best meaning of the statutory term ''take.'' (U.S. Fish and Wildlife Service, National Oceanic and Atmospheric Administration 2025)

Bald and Golden Eagle Protection Act

In 1782, the Continental Congress adopted the bald eagle (*Haliaeetus leucocephalus*) as a national symbol. During the next 150 years, the bald eagle was heavily hunted by sportsmen, taxidermists, fishermen, and farmers. To prevent the species from becoming extinct, Congress passed the Bald Eagle Protection Act in 1940. The Act was extremely comprehensive, prohibiting the take, possession, sale, purchase, barter, or offer to sell, purchase, or barter, export or import of the bald eagle "at any time or in any manner." In 1962, Congress amended the Bald Eagle Act to cover golden eagles.

The USFWS Final Rule regarding Regulations for Eagle Incidental Take and Take of Eagle Nests (USFWS 2016) states, "The Eagle Act [Bald and Golden Eagle Protection Act] does not protect eagle habitat, except for nests themselves."

Clean Water Act

Under Section 404 of the Clean Water Act (CWA), the U.S. Army Corps of Engineers (ACOE) is charged with regulating the discharge of dredged and fill material into jurisdictional Waters of the United States (WUS). The terms "Waters of the United States" and "jurisdictional waters" refer to those aquatic features subject to federal jurisdiction under the CWA. The scope of federal jurisdiction has been refined by recent judicial decisions, subsequent regulatory actions, and rulemaking.

Consistent with the U.S. Supreme Court's May 25, 2023 decision in *Sackett v. EPA*, the ACOE currently limits federal jurisdiction under the CWA to relatively permanent waters, such as streams, rivers, lakes, and oceans, and to wetlands that have a continuous surface connection to such waters, such that there is no clear demarcation between the wetland and the adjacent water body; wetlands and other aquatic features that are separated from relatively permanent waters by uplands, berms, roads, or other breaks in surface connection generally do not meet this jurisdictional standard. Accordingly, WUS, as defined by current federal regulation, refined through case law, and implemented by the ACOE in light of *Sackett v. EPA* (2023), generally include: (1) traditional navigable waters, including the territorial seas and other waters that are used, were used in the past, or may be susceptible to use in interstate or foreign commerce; (2) relatively permanent tributaries to traditional navigable waters; and (3) wetlands that have a continuous surface connection to traditional navigable waters or to relatively permanent tributaries, such that they are indistinguishable from those waters.

In November 2025, the U.S. Environmental Protection Agency (EPA) and the Department of the Army (DOA) published a proposed rule to further revise and clarify the regulatory definition of "waters of the United States" in response to the *Sackett v. EPA* decision. The proposed rule does not expand the scope of federal jurisdiction; rather, it provides additional regulatory clarity by defining key terms such as "relatively permanent," "tributary," and "continuous surface connection," refining how jurisdiction is applied along tributary networks, and clarifying the treatment of certain features and exclusions, including ditches, waste treatment systems, prior converted cropland, and groundwater. The proposed rule also revises the treatment of interstate waters and other jurisdictional categories to ensure consistency with the *Sackett* decision. As of November 2025, this rule is proposed and not final, and the ACOE continues to implement existing regulations and guidance consistent with *Sackett*.

Delineation of wetlands under Section 404 of the CWA continues to rely on the presence of hydrophytic vegetation, hydric soils, and wetland hydrology, as described in the *Corps of Engineers Wetland Delineation Manual* (Environmental Laboratory 1987) and the *Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region* (ACOE 2008). However, the presence of wetland indicators alone does not confer federal jurisdiction. To be considered jurisdictional, a wetland must also satisfy the applicable jurisdictional connectivity standard, including a continuous surface connection to a relatively permanent water, consistent with *Sackett v. EPA* (2023) and federal regulations and guidance in effect as of November 2025.

Aquatic features such as isolated wetlands, ephemeral drainages, and other features that lack a continuous surface connection to relatively permanent waters are generally not considered jurisdictional under the CWA, consistent with *Sackett v. EPA* (2023) and the ACOE's current and proposed regulatory framework.

Section 401 of the CWA requires that any applicant for a federal license or permit (including under the ACOE Section 404) that may result in a discharge to WUS must either obtain Water Quality Certification from the state (or an authorized state agency) or a waiver thereof. In California, this certification (or waiver) is issued by the Regional Water Quality Control Board (RWQCB).

State of California

California Environmental Quality Act

Primary environmental legislation in California is found in the CEQA and its implementing guidelines (State CEQA Guidelines), requiring that projects with potential adverse effects or impacts on the environment undergo environmental review. Adverse impacts to the environment are typically mitigated as a result of the environmental review process in accordance with existing laws and regulations. The District is the Lead Agency under the CEQA for the proposed Project, and this report is part of that environmental review process.

California Fish and Game Code

The California Fish and Game Code (FGC) provides specific protection and listing for several types of biological resources. Section 1600 of the FGC requires a Lake and Streambed Alteration Agreement (LSAA) for any activity that would alter the flow, change, or use any material from the bed, channel, or bank of any perennial, intermittent, or ephemeral river, stream, and/or lake. Typical activities that require an LSAA include excavation or fill placed within a channel, vegetation clearing, structures for diversion of water, installation of culverts and bridge supports, cofferdams for construction dewatering, and bank reinforcement. Notification is required prior to any such activities, and California Department of Fish and Wildlife (CDFW) will issue an LSAA with any necessary mitigation to ensure protection of the State's fish and wildlife resources.

Pursuant to FGC Section 3503, it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by this code or any regulation made pursuant thereto. Raptors and owls and their active nests are protected by FGC Section 3503.5, which states that it is unlawful to take, possess, or destroy any birds of prey or to take, possess, or destroy the nest or eggs of any such bird unless authorized by the CDFW. Section 3513 states that it is unlawful to take or possess any migratory non-game bird as designated in the MBTA. These regulations could require that construction activities (particularly vegetation removal or construction near nests) be reduced or eliminated during critical phases of the nesting cycle unless surveys by a qualified biologist demonstrate that nests, eggs, or nesting birds will not be disturbed, subject to approval by CDFW and/or USFWS.

California Endangered Species Act

The California Endangered Species Act (CESA) established that it is State policy to conserve, protect, restore, and enhance State-listed Endangered species and their habitats. Under State law, plant and animal species may be formally designated Rare, Threatened, or Endangered by official listing by the California Fish and Game Commission. CESA authorizes that private entities may "take" plant or wildlife species listed as Endangered or Threatened under the FESA and CESA, pursuant to a federal Incidental Take Permit if the California Department of Fish and Wildlife (CDFW certifies that the incidental take is consistent with CESA (FGC Section 2080.1[a]). For State-only listed species, Section 2081 of the CESA authorizes the CDFW to issue an Incidental Take Permit for State listed threatened and endangered species if specific criteria are met.

Porter-Cologne Water Quality Control Act of 1970

The Porter-Cologne Water Quality Control Act of 1970 (Porter-Cologne Act) grants the State Water Resources Control Board (SWRCB) and its nine Regional Water Quality Control Boards (RWQCBs) the authority to protect water quality within the State of California and serves as the primary mechanism for implementation of the State's responsibilities under Section 401 of the federal CWA. The Porter-Cologne Act authorizes the State Water Board and RWQCBs to adopt water quality control plans and policies, regulate discharges of waste to surface waters and groundwater, oversee waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants.

Under the Porter-Cologne Act, Waters of the State (WS) are defined broadly to include any surface water or groundwater, including saline waters, within the boundaries of the State. This definition is broader than the federal definition of Waters of the United States and is not limited by federal jurisdictional standards such as relatively permanent flow or a continuous surface connection. WS include, but are not limited to, perennial, intermittent, and ephemeral drainages; isolated wetlands; ponds; lakes; springs; seeps; and both natural and artificial water features, regardless of whether they are subject to federal Clean Water Act jurisdiction.

Unlike federal wetland determinations under Section 404 of the CWA, the State's definition of wetland WS does not rely solely on the presence of hydrophytic vegetation, hydric soils, and wetland hydrology (the ACOE's wetland delineation "triad"). While wetlands meeting federal delineation criteria are considered WS, features that do not meet federal wetland criteria may still qualify as WS if they constitute surface water or groundwater subject to state water quality regulation.

In practice, the SWRCB and RWQCBs often act in coordination with the ACOE under Section 401 of the CWA when projects involve the discharge of dredged or fill material to federally jurisdictional WUS. However, the State retains independent authority under the Porter-Cologne Act to regulate discharges to WS that are not subject to federal jurisdiction.

METHODS

Literature Review

Prior to conducting field investigations, Alden performed a review of the California Natural Diversity Database (CNDDB), SanBIOS/County vegetation mapping, USFWS species database, iNaturalist database, and Xerces Society's Bumble Bee Atlas for sensitive species reported on the Project site or within one mile of the site. Current and historic aerial imagery of the site was reviewed, as was U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) Web Soil Survey data. The National Hydrography Dataset (NHD) and National Wetlands Inventory (NWI) also were queried for potential non-wetland waters and wetlands within the Study Area.

Vegetation Mapping

A single site visit was conducted by Biologist Greg Mason on March 31, 2026, to map vegetation and sensitive biological resources observed within the Study Area. The site was walked, and plant and animal species were recorded during all site visits (Attachments A & B). Plant species names followed the Jepson Manual (Baldwin et al. 2012). Vegetation communities were mapped according to Holland's Preliminary Descriptions of the Terrestrial Natural Communities of California (Holland 1986) as updated (Oberbauer et al. 2008). Representative photographs also were taken during site visits and are included in Attachment C.

Jurisdictional Resources

Although a formal delineation was not conducted, the site was assessed for features that could be considered jurisdictional by the U.S. Army Corps of Engineers (Corps), California Department of Fish & Wildlife (CDFW), and the Regional Water Quality Control Board (RWQCB).

Sensitive Species

Focused special status plant and animal species surveys were not conducted as their potential to occur within the Study Area is low because; 1) the site is an active school facility, with development and use dating back at least into the 1950s; 2) the majority of the impacts would be to the developed area inside its fence line; and 3) the database search did not result in a high likelihood of sensitive species occurring within the development limits. However, sensitive species were searched for opportunistically during the site visit.

Nesting Birds

Trees and shrubs with the potential to support nesting bird species (including raptors) within and adjacent to the project site were inspected to identify active or inactive bird nests that may be present.

RESULTS

Environmental Setting

The Dehesa School is located in a rural portion of the County. Scattered single-family residences occur in the vicinity of the school. Dehesa Road, agricultural land, and undeveloped areas also border the school site. The Sweetwater River occurs approximately 0.2 miles to the southwest, on the south side of Dehesa Road. Elevations range from approximately 500 feet (at Dehesa Road) to 575 feet above mean sea level. Soils consist of Visalia sandy loam (5 - 9% slopes), Las Posas stony fine sandy loam (9 - 30% slopes), and Vista coarse sandy loam (15 - 30% slopes).

Vegetation Communities

A single sensitive plant community, Diegan coastal sage scrub, occurs within the Study Area, but outside the limits of the development footprint. Non-sensitive non-native grassland, ornamental, disturbed habitat, and developed land are also present (Figure 3; Table 1).

Table 1
Existing Vegetation Communities

Vegetation Community	Acreage
Diegan Coastal Sage Scrub	1.3
Non-native Grassland	3.3
Ornamental	0.7
Disturbed Habitat	3.1
Developed	4.9
Total	**13.3**

[1]Sensitive vegetation community

Diegan Coastal Sage Scrub

The project site supports Diegan coastal sage scrub vegetation (Table 1; Figure 3) dominated by California buckwheat (*Eriogonum fasciculatum*) and California sagebrush (*Artemisia californica*), with components of lemonade berry (*Rhus integrifolia*) and laurel sumac (*Malosma laurina*). This vegetation community is recognized by the CDFW as a sensitive natural community through the CNDDB.

Nonnative Grassland

Non-native grassland occurs within the Study Area (Table 1; Figure 3). This community is a dense to sparse cover of non-native grasses, sometimes associated with species of showy-flowered, native, annual forbs. Characteristic species on site include wild oat (*Avena fatua*), bromes (*Bromus rubens*, *B. diandrus*), and Italian ryegrass (*Festuca perenne*). Most of the annual, introduced species that comprise the species and biomass within non-native grassland originated from the Mediterranean region, an area with a long history of agriculture and a climate like California. These two factors, in addition to intensive grazing and agricultural practices in conjunction with droughts, contributed to the successful invasion and establishment of these species. Non-native grassland is not recognized by the CDFW or the CNDDB as a sensitive natural community.

Ornamental

Ornamental vegetation occurs within the Study Area (Table 1; Figure 3), in association with developed areas, and is characterized by numerous nonnative groundcover, ornamental shrubs, and tree species that were intentionally planted and are being actively managed. Ornamental vegetation is not considered a sensitive biological resource.

Disturbed Habitat

Areas mapped as disturbed habitat (Table 1; Figure 3) were bare ground or were clearly dominated by non-native forb species, including black mustard (*Brassica nigra*), garland daisy (*Glebionis coronaria*), and Hottentot's fig (*Carpobrotus edulis*). The disturbed habitat includes dirt roads, trails, and previously cleared active use areas adjacent to existing school facilities. Disturbed habitat is not considered a sensitive biological resource.

Developed

Developed land includes the existing school buildings and associated pavement, sports fields, parking lot, ancillary structures, and driveways (Table 1; Figure 3). Developed land is not considered a sensitive biological resource.

Special Status Plant Species

No sensitive plant species were observed, and none are expected, due to the developed nature of the site.

Special Status Animal Species

No special status animal species were observed. The developed and landscaped portions of the project footprint provide limited suitability for special status wildlife species. While the coastal sage scrub habitat on and adjacent to the property may provide suitable habitat for the federally threatened coastal California gnatcatcher (*Polioptila californica californica*), the habitat occurs outside of the project impact footprint and would not be directly impacted by project implementation. The federally endangered arroyo toad (*Anaxyrus californicus*) has also been documented approximately 700 feet south of the site within suitable riparian habitat associated with the Sweetwater River. Although the project site falls within the potential upland dispersal range for this species, the developed nature of the campus, absence of suitable habitat, and the presence of Dehesa Road between the site and occupied habitat substantially limit the potential for arroyo toad occurrence within the project footprint. Therefore, special status wildlife species are not expected to occur within the project impact areas or be adversely affected by project implementation.

Nesting Birds

Ornamental landscaping and coastal sage scrub habitat have the potential to support nesting bird species protected under the Migratory Bird Treaty Act (MBTA) and California Fish and Game Code. No active or inactive nests were observed during the site visits. Although suitable nesting habitat occurs within the Study Area, nesting bird impacts are not expected through compliance with applicable nesting bird protection requirements.

Jurisdictional Features

During the site visit, the project area was assessed for features potentially subject to jurisdiction by the Corps, CDFW, and RWQCB. Indicators evaluated included wetland vegetation, drainage features, ordinary high water mark characteristics, bed and bank features, hydric soils, and other indicators of potentially jurisdictional waters or wetlands. The project site consists of an existing developed school campus and does not support natural drainage features, wetland vegetation, or other indicators of jurisdictional waters or wetlands. Therefore, no jurisdictional features were identified within the project impact area, and permits from the Corps, CDFW, or RWQCB are not expected to be required for project implementation.

PROJECT IMPACTS

This section analyzes project effects on biological resources in accordance with the CEQA Guidelines (i.e., Appendix G of the CEQA Guidelines). According to Appendix G of the CEQA Guidelines, a project would have a significant impact if it would:

1. 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 CDFW or USFWS;

2. 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 CDFW or USFWS;

3. Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means;

4. 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;

5. Conflict with any local policies or ordinances protecting biological resources; and/or

6. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

Direct Impacts

Direct impacts immediately alter affected biological resources such that those resources are temporarily or permanently modified or removed. The proposed project would occur within an existing developed school campus and would primarily affect previously disturbed and developed areas.

Vegetation Communities/Land Uses

Project implementation would impact 1.5 acres of the Study Area. These impacts would be to developed land, disturbed habitat, and non-native grassland (Table 2). Non-native grassland is not recognized as a sensitive natural community by the CDFW or CNDDB under statewide resource agency criteria. The coastal sage scrub habitat occurs outside of the project impact footprint and would not be directly impacted by project implementation. Therefore, the project would not result in significant impacts to sensitive natural communities (Significance Criterion 2).

Table 2
Impacts to Vegetation Communities

Vegetation Community	Acreage
Diegan Coastal Sage Scrub	-
Non-native Grassland	0.3
Ornamental	-
Disturbed Habitat	0.8
Developed	0.4
Total	**1.5**

Jurisdictional Features

No jurisdictional features occur within the project impact area. Therefore, the project would not affect federally protected wetlands or other jurisdictional waters (Significance Criterion 3).

Sensitive Plant Species

No special status plant species were observed within the Study Area during the survey, and the disturbed and developed nature of the project footprint provides limited suitability for sensitive plant species. Therefore, impacts to sensitive plant species are not expected (Significance Criterion 1).

Sensitive Animal Species

No special status animal species were observed within the Study Area during the survey. The developed and landscaped portions of the project footprint provide limited suitability for special status wildlife species. Additionally, coastal sage scrub habitat on and adjacent to the site may provide suitable habitat for the federally threatened coastal California gnatcatcher; however, the habitat occurs outside of the project impact footprint and would not be directly impacted by project implementation. The federally endangered arroyo toad has been documented approximately 700 feet south of the site within suitable aquatic habitat. Although the project site falls within the potential upland dispersal range for this species, the developed nature of the campus, the absence of suitable habitat, and the presence of Dehesa Road between the site and occupied habitat substantially limit the potential for arroyo toad occurrence within the project footprint. Therefore, the project is not expected to result in impacts to special status wildlife species (Significance Criterion 1).

Nesting Birds

Ornamental landscaping and coastal sage scrub habitat have the potential to support nesting bird species protected under the MBTA and California Fish and Game Code. No active or inactive nests were observed during the site visit. If construction activities occur during the general avian nesting season (generally February 1 through September 15), impacts to active nests could occur. Compliance with standard preconstruction nesting bird survey requirements and avoidance measures would ensure compliance with the MBTA and California Fish and Game Code. With the implementation of these measures, impacts to nesting birds would be less than significant (Significance Criterion 1).

Wildlife Corridors

The project site consists of an existing developed school campus and does not function as a wildlife corridor or linkage. The project would not substantially interfere with wildlife movement or impede the use of wildlife nursery sites (Significance Criterion 4).

Compliance with Local Policies or Ordinances

The project would not conflict with local policies or ordinances protecting biological resources (Significance Criterion 5).

Compliance with the Provisions of a Conservation Plan

The project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved conservation plan area. Therefore, the project would not conflict with the provisions of any adopted conservation plan (Significance Criterion 6).

Indirect Impacts

Indirect impacts consist of secondary effects of a project that can occur during construction or from a project once built. Potential indirect impacts may include fugitive dust, noise, water quality, invasive plant species, nuisance animal species, night lighting, and human activity. Each of these indirect impacts may adversely affect natural communities and/or wildlife that occur adjacent to a project site. Since the proposed project involves improvements to an existing, active school campus, significant indirect impacts on biological resources are not anticipated.

MITIGATION MEASURES

The proposed project would not result in significant impacts to sensitive biological resources; therefore, mitigation measures are not required. Although ornamental landscaping and coastal sage scrub habitat have the potential to support nesting birds protected under the MBTA and California Fish and Game Code, compliance with applicable nesting bird protection requirements during the avian breeding season would be incorporated into project implementation. As such, the project would conform with applicable federal and state regulations protecting nesting birds, and impacts to biological resources would remain less than significant.

CONCLUSION

The proposed project would occur within an existing developed school campus and would impact non-sensitive developed land, disturbed habitat, ornamental landscaping, and a small amount of non-native grassland. The sensitive Diegan coastal sage scrub habitat mapped within the Study Area occurs outside of the project impact footprint and would not be impacted by the project. No jurisdictional features occur within the project impact area, and no special status plant or animal species were observed or are expected to occur.

Although coastal sage scrub habitat on and adjacent to the site may provide suitable habitat for the federally threatened coastal California gnatcatcher, and the federally endangered arroyo toad has been documented in the surrounding area, the developed nature of the campus, lack of suitable habitat within the project footprint, and the physical separation from occupied habitat substantially limit the potential for these species to occur within the impact area or be affected by project implementation.

Ornamental landscaping and coastal sage scrub habitat within the Study Area have the potential to support nesting birds protected under the MBTA and California Fish and Game Code. Compliance with applicable nesting bird protection requirements during the avian breeding season would be incorporated into project implementation. As such, the project would conform with applicable federal and state regulations protecting nesting birds, and impacts to biological resources would remain less than significant.

Based on the results of this assessment, the proposed project would not result in significant impacts to biological resources, and mitigation measures are not required. Please contact me if you have any questions regarding this letter report.

Sincerely,



Greg Mason
Senior Biologist

Enclosures:
Figure 1 – Regional Location
Figure 2 – Project Location
Figure 3 – Biological Resources/Impacts
Attachment A – Plant Species Observed
Attachment B – Animal Species Observed
Attachment C – Representative Photographs

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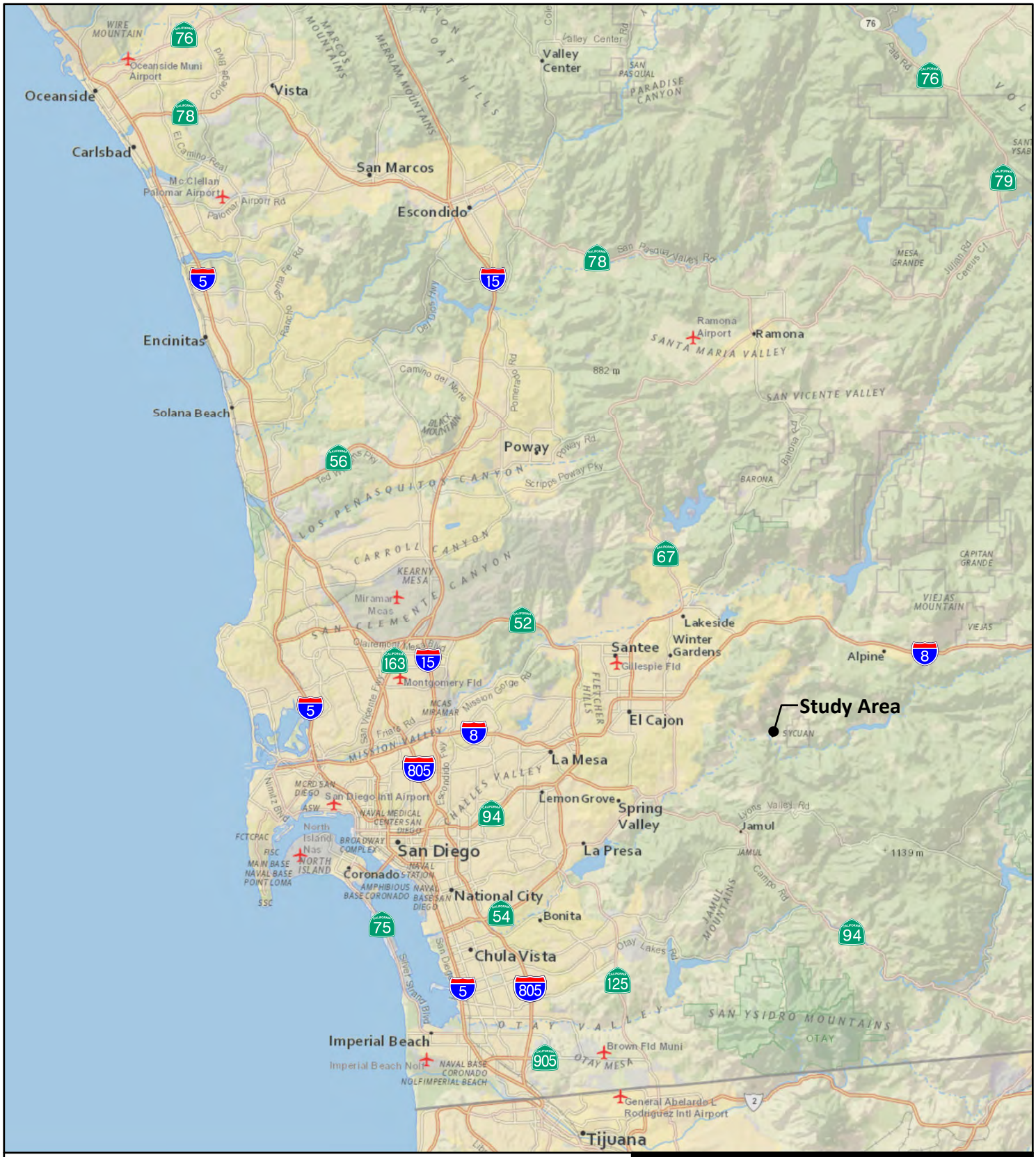


Figure 1

Regional Location

EXISTING DEHESA SCHOOL
CAMPUS MODERNIZATION

ALDEN
ENVIRONMENTAL, INC



Aerial Photo: USDA NAIP 2024

N
W E
S

0 1,500 3,000 Feet

ALDEN ENVIRONMENTAL, INC

Figure 2

Project Location

EXISTING DEHESA SCHOOL
CAMPUS MODERNIZATION



Study Area
Project Impacts
Photo Location

Vegetation

- Diegan Coastal Sage Scrub-Disturbed
- Non-native Grassland
- Ornamental
- Disturbed Habitat
- Developed

N
W E
S

0 60 120 Feet

ALDEN ENVIRONMENTAL, INC

Figure 3

Biological Resources/Impacts

EXISTING DEHESA SCHOOL
CAMPUS MODERNIZATION

ATTACHMENT A
PLANT SPECIES OBSERVED

Family	Scientific Name[1]	Common Name
Adoxaceae	*Sambucus nigra* ssp. *caerulea*	blue elderberry
Aizoaceae	*Carpobrotus edulis*[1]	hottentot-fig
	Delosperma sp.[1]	delosperma
	Lampranthus sp.[1]	Ice plant
	Malephora crocea[1]	Coppery mesembryanthemum
Anacardiaceae	*Pistacia chinensis*[1]	Chinese pistache
	Schinus molle[1]	Peruvian pepper tree
Apocynaceae	*Asclepias fascicularis*[1]	Narrowleaf milkweed
	Nerium oleander[1]	Oleander
Arecaceae	*Brahea armata*[1]	Mexican blue palm
Asteraceae	*Artemisia californica*	California sagebrush
	Carduus pycnocephalus[1]	Italian thistle
	Cearntaurea melitensis[1]	tocalote
	Erigeron canadensis	horseweed
	Glebionis coronaria[1]	garland daisy
	Hedypnois rhagadioloides[1]	Crete hedypnois
	Heterotheca grandiflora	telegraph weed
	Hypochaeris glabra[1]	smooth catsear
	Lactuca serriola[1]	wild lettuce
	Logfia gallica[1]	narrow-leaf filago
	Sonchus oleraceus[1]	Common sow-thistle
Boraginaceae	*Amsinckia intermedia*	rancher's fiddleneck
Brassicaceae	*Brassica nigra*[1]	black mustard
	Hirschfeldia incana[1]	short-pod mustard
	Raphanus sativus[1]	wild radish
Chenopodiaceae	*Salsola tragus*[1]	Russian thistle
Crassulaceae	*Crassula ovata*[1]	Jade plant
	Graptopetalum paraguayense[1]	Ghost plant
Cyperaceae	*Cyperus alternifolius*[1]	Umbrella sedge
Euphorbiaceae	*Euphorbia* sp.[1]	Candelabra spurge
Fabaceae	*Acacia* sp.[1]	Acacia
	Medicago polymorpha[1]	bur clover
Fagaceae	*Quercus agrifolia*	coast live oak
Geraniaceae	*Erodium botrys*[1]	long-beak filaree
	Erodium cicutarium[1]	redstem filaree
Malvaceae	*Malva parviflora*[1]	cheeseweed
Myrtaceae	*Eucalyptus* sp.[1]	Eucalyptus
	Melaleuca viminalis[1]	Weeping bottlebrush

ATTACHMENT A
PLANT SPECIES OBSERVED

Nyctaginaceae	*Bougainvillea* sp.[1]	Bougainvillea
Oxalidaceae	*Oxalis corniculata*	Creeping woodsorrel
Pinaceae	*Pinus* sp.[1]	Pine
Pittosporaceae	*Pittosporum tobira*[1]	Japanese mock orange
Poaceae	*Avena barbata*[1]	slender oat, slender wild oat
	Avena fatua[1]	wild oat
	Bromus diandrus[1]	common ripgut grass
	Bromus madritensis[1]	foxtail chess
	Bromus rubens[1]	foxtail chess, red brome
	Cynodon dactylon[1]	Bermuda grass
	Hordeum murinum[1]	Foxtail barley
	Lamarckia aurea[1]	goldentop grass
	Schismus barbatus[1]	Mediterranean grass
Polemoniaceae	*Phacelia* sp.	Phacelia
Polygonaceae	*Eriogonum fasciculatum*	California buckwheat
Rosaceae	*Rhaphiolepis indica*[1]	Indian hawthorn
Salicaceae	*Populus* sp.[1]	Poplar
	Salix sp.	willow
Sapindaceae	*Koelreuteria* sp.	Golden rain tree
Solanaceae	*Datura wrightii*[1]	jimson weed
	Nicotiana glauca[1]	tree tobacco
Verbenaceae	*Lantana camara*[1]	Lantana
[1]Non-native species		

ATTACHMENT B
ANIMAL SPECIES OBSERVED

SCIENTIFIC NAME	COMMON NAME
INVERTEBRATES	
Apis mellifera	European honeybee
Brephidium exilis	western pygmy blue
Hylephila phyleus	fiery skipper butterfly
Muscidae sp.	domestic fly
Pieris rapae	cabbage white
Pogonomyrmex barbatus	red harvester ant
Toxomerus sp.	hoverfly
Veromessor pergandei	black harvester ant
VERTEBRATES	
Birds	
Buteo lineatus	red-shouldered hawk
Calypte anna	Anna's hummingbird
Chamaea fasciata	wrentit
Corvus corax	common raven
Haemorhous mexicanus	house finch
Melozone crissalis	California towhee
Melospiza melodia	song sparrow
Mimus polyglottos	northern mockingbird
Pipilo maculatus	spotted towhee
Psaltriparus minimus	bushtit
Sturnus vulgaris	European starling
Thryomanes bewickii	Bewick's wren
Troglodytes aedon	house wren
Zenaida macroura	mourning dove
Mammal	
Canis latrans	coyote (scat)
Otospermophilus beecheyi	California ground squirrel
Sylvilagus	cottontail
Thomomys bottae	Botta’s pocket gopher-burrows
Reptile	
Sceloporus occidentalis	western fence lizard

ATTACHMENT C
Representative Photographs (03/31/2026)



Photo Point 1.



Photo Point 2.

ATTACHMENT C
Representative Photographs (03/31/2026)



Photo Point 3.



Photo Point 4.

ATTACHMENT C
Representative Photographs (03/31/2026)



Photo Point 5.



Photo Point 6.

ATTACHMENT C
Representative Photographs (03/31/2026)



Photo Point 7.



Photo Point 8.

ATTACHMENT C
Representative Photographs (03/31/2026)



Photo Point 9.



Photo Point 10.

ATTACHMENT C
Representative Photographs (03/31/2026)



Photo Point 11.



Photo Point 12.

ATTACHMENT C
Representative Photographs (03/31/2026)



Photo Point 13.



Photo Point 14.

ATTACHMENT C
Representative Photographs (03/31/2026)



Photo Point 15.



Photo Point 16.

ATTACHMENT C
Representative Photographs (03/31/2026)



Photo Point 17.

CEQA Notice of Exemption 5-13-26

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