DRAFT

PSUSD
PALM SPRINGS UNIFIED SCHOOL DISTRICT

Prepared For:
Palm Springs Unified School District
150 District Center Drive
Palm Springs, CA 92264
Julie Arthur, Executive Director

Initial Study/Mitigated Negative Declaration

Palm Springs High School Seismic Upgrades and Modernization Improvements

Westlake Village Office
920 Hampshire Road, Suite A5
Westlake Village, CA 91361

Meridian Consultants

Los Angeles Office
706 S. Hill Street, 11th Floor
Los Angeles, CA 90014

October 2019

DRAFT

INITIAL STUDY/MITIGATED NEGATIVE DECLARATION

for the

Palm Springs High School

Seismic Upgrades and Modernization Improvements

PREPARED FOR:

Palm Springs Unified School District
150 District Center Drive
Palm Springs, CA 92264
Contact: Julie Arthur, Executive Director
Telephone: (760) 883-2710

PREPARED BY:

Westlake Village Office
920 Hampshire Road, Suite A5
Westlake Village, CA 91361

Meridian Consultants

Los Angeles Office
706 S. Hill Street, 11th Floor
Los Angeles, CA 90014

October 2019

Table of Contents

Section			Page
1.0	Introduction		1.0-1
2.0	Environmental Setting		2.0-1
3.0	Project Description		3.0-1
4.0	Environmental Checklist		4.0-1
5.0	Environmental Analysis		5.0-1
	5.1	Aesthetics	5.0-3
	5.2	Agricultural and Forestry Resources	5.0-7
	5.3	Air Quality	5.0-10
	5.4	Biological Resources	5.0-17
	5.5	Cultural Resources	5.0-21
	5.6	Energy	5.0-28
	5.7	Geology and Soils	5.0-30
	5.8	Greenhouse Gas Emissions	5.0-38
	5.9	Hazards and Hazardous Materials	5.0-41
	5.10	Hydrology and Water Quality	5.0-59
	5.11	Land Use and Planning	5.0-66
	5.12	Mineral Resources	5.0-68
	5.13	Noise	5.0-70
	5.14	Population and Housing	5.0-79
	5.15	Public Services	5.0-80
	5.16	Recreation	5.0-83
	5.17	Transportation	5.0-85
	5.18	Tribal Cultural Resources	5.0-88
	5.19	Utilities and Service Systems	5.0-91
	5.20	Wildfires	5.0-95
	5.21	Mandatory Findings of Significance	5.0-97
6.0	References		6.0-1
7.0	List of Preparers		7.0-1

Appendices

A	Distribution List
B	Air Quality and Greenhouse Gas Background and Modeling Data
C	Cultural Resources Background Data
	C.1 Cultural Resources Records Review
	C.2 Final Historical Resources Assessment Report
	C.3 Historical Resources Assessment Memorandum
D	EDR Report
E	AB 52 Tribal Consultation Letters

List of Figures

Figure		Page
2.0-1	Regional Location Map	2.0-5
2.0-2	Project Location Map	2.0-6
2.0-3	Land Use Map	2.0-7
2.0-4	Zoning Map	2.0-8
2.0-5	Palm Springs High School and Desert Learning Academy Site Plan	2.0-9
3.0-1	Overall Site Plan	3.0-3
3.0-2	Enlarged Site Plan	3.0-4
3.0-3	Proposed Landscape Plan	3.0-5

List of Tables

Table		**Page**
3.0-1	Project Construction Phasing	3.0-7
4.0-1	Environmental Review Factors for State-Funded New School and State-Funded Addition to Existing School	4.0-2
5.3-1	Maximum Construction Emissions	5.0-12
5.3-2	Maximum Operational Emissions	5.0-12
5.3-3	Localized Significance Threshold (LST) Worst-Case Emissions	5.0-14
5.8-1	Estimated Construction and Operational Greenhouse Gas Emissions	5.0-39
5.13-1	Typical Maximum Noise Levels for Construction Phases	5.0-72
5.13-2	Typical Vibration Levels	5.0-76

1.0 INTRODUCTION

OVERVIEW

The Palm Springs Unified School District (PSUSD) is proposing to implement various seismic upgrades and modernization improvements on the Palm Springs High School (PSHS) campus (proposed Project). Of those buildings that would undergo seismic upgrades and modernization improvements as part of the proposed Project include the: (1) library; (2) gymnasium; and (3) cafeteria. The proposed Project would include the renovation of these 3 buildings to meet current seismic standards modernization improvements, as well as the construction of a new 7,400-square-foot mini-gym within the cafeteria and the addition of a 1,950-square-foot lobby on the northeast corner of the gymnasium. Lastly, the proposed Project would involve various hardscape and landscaping improvements across the PSHS campus to improve existing drainage conditions. Implementation of the proposed Project would provide the PSHS campus with a range of upgraded and modern facilities that meet current standards.

AUTHORITY

As part of the District's approval process, the proposed Project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA). This Initial Study (IS) and Mitigated Negative Declaration (MND) have been prepared pursuant to CEQA for the proposed Project.

The preparation of a MND is governed by two principal sets of documents: CEQA[1] and the State *CEQA Guidelines*,[2] specifically, guide the process for the preparation of a negative declaration (ND) or MND. Where appropriate and supportive to an understanding of the issues, reference will be made to the statute, the State *CEQA Guidelines*, or the appropriate case law. A MND is prepared for a project when the Initial Study has identified potentially significant effects on the environment but (1) revisions in the project plans or proposals made or agreed to by the applicant before the proposed ND and IS are released for public review would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur; and (2) there is no substantial evidence in light of the whole record before the public agency that the project, as revised, may have a significant effect on the environment.

Implementation of the proposed Project could cause some potentially significant impacts on the environment, but as evidenced by the environmental analysis contained in this IS, all of the proposed Project's potentially significant impacts would be reduced to less than significant levels through the

1 California Code of Regulations, sec. 15000, et seq., State *CEQA Guidelines*.
2 California Code of Regulations, sec. 15000, et seq.

implementation of mitigation measures. Consequently, the analysis contained herein concludes that a MND shall be prepared for the proposed Project.

ORGANIZATION OF THE INITIAL STUDY

The purpose of the IS/MND is to evaluate the potential environmental impacts of the proposed Project. The content and format of this document are designed to meet the requirements of CEQA. This document is organized into the following sections:

1.0 **Introduction:** provides an introduction of the proposed Project and describes the purpose and organization of this document.

2.0 **Environmental Setting:** describes the existing conditions, surrounding land use, general plan, and existing zoning in the proposed Project area.

3.0 **Project Description:** identifies the location, background, and provides a detailed description of the proposed Project.

4.0 **Environmental Checklist:** presents the checklist responses and evaluation for each resource topic.

5.0 **Environmental Analysis:** this section includes an analysis for reach resource topic and identifies impacts of implementing the proposed Project. It also identifies mitigation measures, if applicable.

6.0 **References:** identifies all printed references and individuals citied in this MND.

7.0 **List of Preparers:** identifies the individuals who prepared this report and their areas of technical specialty.

The following appendices present data supporting the analysis or contents of this IS/MND. These include:

- **Appendix A: Distribution List**
- **Appendix B: Air Quality and Greenhouse Gas Background and Modeling Data**
- **Appendix C: Cultural Resources Background Data**
- **Appendix D: EDR Report**
- **Appendix E: AB 52 Tribal Consultation Letters**

PUBLIC AND AGENCY REVIEW OF THE INITIAL STUDY

CEQA requires that the lead agency provide the public and agencies the opportunity to review and comment on a Draft MND. As outlined by CEQA, the District is providing a 30-day period for review and comment on the Draft MND. Upon completion of the public and agency review period, the District, as lead agency, will evaluate comments on environmental issues received from persons who reviewed the Draft MND and prepare written responses. The District will include these comments and responses in a Final

MND along with any changes that will be reviewed and considered for adoption by the PSUSD Board of Trustees.

A complete distribution list is included in **Appendix A: Distribution List**.

Interested individuals, organizations, responsible agencies, and other agencies can provide written comments to:

Palm Springs Unified School District
Facilities Planning & Development Department
150 District Center Drive
Palm Springs, CA 92264
Contact: Julie Arthur, Executive Director

Comments may also be sent by facsimile to (760) 325-8728 or by email at facilitiesplanning@psusd.us. Please put "PSHS Seismic Upgrades and Modernization Improvements Project" in the subject line.

Agency responses should include the name of a contact person within the commenting agency.

In addition, the Draft IS/MND is available on the PSUSD's website at:

http://www.psusd.us/

2.0 ENVIRONMENTAL SETTING

PROJECT LOCATION

The City of Palm Springs is in the central part of Riverside County and is surrounded by unincorporated Riverside County to the north, south, east, and west. Regional access to the City is gained through the Interstate 10 (I-10), which runs north of the City; State Route (SR) 111, which intersects the City; SR 74, which runs from the coast over the San Jacinto Mountains; and SR 62, which intersects the I-10 northwest of the City. As shown in **Figure 2.0-1: Regional Location Map**, direct access to the Project site is gained through SR 111.

The Project site, consisting of the PSHS campus, is located at 2401 East Baristo Road at an area of approximately 43-acres. The PSHS campus immediately adjoins the District's Desert Learning Academy (DLA) campus, which has an address of 2248 East Ramon Road. The joint PSHS-DLA campus is located on the same parcel for total area of approximately 48 acres. As shown in **Figure 2.0-2: Project Location Map,** the Project site is bound by East Baristo Road to the north, South Farrell Drive to the east, East Ramon Road to the south, and South Pavilion Way to the west. The Project Site is identified by Assessor's Parcel Numbers (APNs) 502200009, -10, -11, -12, and 502230006. As shown in **Figure 2.0-2**, the Project site is located within the central portion of the City of Palm Springs.

GENERAL PLAN AND EXISTING ZONING

The City of Palm Springs General Plan land use designation for the Project site is "School Use" (**Figure 2.0-3: Land Use Map**), with a zoning designation of "Open Land Zone" (**Figure 2.0-4: Zoning Map**).

School uses are permitted under the City's Land Use and Zoning Designation for the Project site.

SURROUNDING LAND USES

Land uses to the north, located along East Baristo Road, consist of residential, commercial, and office space. Land uses to the east, located along South Farrell Drive, consist of commercial, residential, and office space. Land uses to the south, located along East Ramon Road, consist of single-family residential units. Land uses to the west, located along South Pavilion Way, consist of various City park and community facilities, including the swim center, skate park, stadium, and the City's Library and Parks and Recreation Department.

EXISTING CONDITIONS

The joint PSHS campus consists of numerous buildings and is situated across a total area of approximately 48 acres. As shown in **Figure 2.0-5: Palm Springs High School and Desert Learning Academy Site Plan**, the

PSHS campus includes approximately 20 buildings. Of those buildings that would undergo seismic upgrades and modernization improvements as part of the proposed Project include the: (1) library; (2) gymnasium; and (3) cafeteria.

As shown in **Figure 2.0-5**, the library is located in the southern portion of the Project site and was originally constructed in 1959. The library is approximately 9,000 square feet in size and is approximately 20 feet in height with a partial mechanical mezzanine. The library also contains a 1-story extension located to the north of the building and is used for textbook storage and other library uses.

The gymnasium is located in the northern portion of the Project site, as shown in **Figure 2.0-5**, adjacent to the athletic fields. Reportedly built in the early 1970s, the gymnasium is approximately 25,000 square feet in size and is approximately 35 feet in height to accommodate the basketball court and other gymnasium functions. The gymnasium also contains a 1-story entryway component on the eastern side of the building which provides a formal entrance for athletic events.

Lastly, the cafeteria, which is located between the library and gymnasium buildings as shown in **Figure 2.0-5**, is approximately 13,000 square feet in size and was originally constructed in 1958. Arranged as one large "C"-shaped building at 1-story in height, the cafeteria was constructed as two separate structures connected by a covered breezeway. The northern structure serves as the kitchen, an indoor and outdoor food delivery facility, and two indoor dining rooms. The southern structure has been historically used as a campus store, as well as very classroom use.

The Project site is located within the City of Palm Springs, and is in a previously developed area with a developed community surrounding the high school. The topography of the Project site is relatively flat and considered mostly arid desert land that has been landscaped as part of the overall campus development over the years. Elevation of the Project site is approximately 407 feet above mean sea level.[3]

HISTORICAL SETTING

General Overview

The first buildings of the joint PSHS-DLA campus were constructed in 1938. A second wave of construction occurred in the mid-1950s and again in the 1990s, during which many of the early buildings were demolished and the campus was completely redesigned and realigned to face East Baristo Road. In the early 1950s, PSUSD hired the local architectural firm of Williams, Williams, & Williams to design a new and enlarged campus. Harry Williams, father of E. Stewart and H. Roger Williams, passed away in 1957, and

3 United States Geological Survey, Quadrangle Map—Palm Springs (1996).

E. Stewart and H. Roger merged with the architects Albert Frey and John Porter Clark after their father's death. E. Stewart Williams and Albert Frey had previously worked together in 1952, on the design for the new city hall and council chamber buildings for the City of Palm Springs.

The team of Williams and Frey may have convinced PSUSD to turn towards the future with the design of more modern new buildings to be added to the campus. From 1958 to 1962, the campus took on a more futuristic appearance with the construction of the 1,165-seat auditorium and music building, administration building, a building devoted to science laboratories and classrooms, a library, gymnasium, cafeteria complex, all designed in the Modern style of architecture.

Many of the buildings on the joint PSHS campus are considered historic. These include the first PSHS buildings (the 200, 300, and 700 Buildings); the auditorium, cafeteria; the library, and the Farrell Building.

Architectural Design

Portions of the PSHS campus, including the auditorium, appear to exhibit examples of Desert Modern Architecture; a regional style of Modernism that developed in the Coachella Valley starting in the late 1940s. Particularly, the library and cafeteria buildings are considered historic buildings on the PSHS campus.

Before the construction of the library building in 1959, the PSHS campus' library services were located in what is now the main dining room of the cafeteria complex building. The room that spans immediately to the west of the main dining room, and also runs along the north elevation of the cafeteria building, served originally as the school's main dining room and study hall area. Today, the open floorplan of the original dining room/study hall acts as a multipurpose room offering space for both casual dining and physical education activities.

E. Stewart Williams designed the original library and dining room/study hall with ample fenestration along north elevations that could take full advantage of the view of the surrounding mountains. This concept of "bringing the outdoors in" was a tenant of modern architecture. Students would be able to enjoy natural scenery during times of inclement weather.

In 1998, the original curtain glass wall of the main dining room was removed and replaced with different fenestration, and a pedestrian door set in the approximate center of the facade. On the south elevation of this room, the six panels of narrow, metal frame window units were removed, and the openings filled with glass block units. The exterior of the cafeteria complex has been clad with a textured finish and painted, to fit in more homogeneously with the surrounding campus buildings.

Cafeteria Dining Rooms

The cafeteria was also designed by Emerson Stewart Williams and originally constructed in 1958. The building appears to be significant on a local level for its distinctive characteristics of Mid-Century Modern architecture. Overall, the two dining room sections complement each other with the low-slung dining room with an emphasis on horizontal massing on the west set in contrast to the wide open and vertically open room to the east. One has bands of narrow ribbon light windows set across its north façade, while the other has a single, large glass curtain wall filling its north façade. The cafeteria was designed to take full advantage of the view of the surrounding mountains so students would be able to enjoy the natural scenery. This concept of "bringing the outdoors in" was a tenant of Mid-Century Modern architecture.

In 1998, the original curtain glass wall of the main dining room was removed and replaced with different fenestration, and a pedestrian door set in the approximate center of the facade. On the south elevation of this room, the six panels of narrow, metal frame window units were removed, and the openings filled with glass block units. The exterior of the cafeteria has been clad with a textured finish and painted to fit in more homogeneously with the surrounding campus buildings.

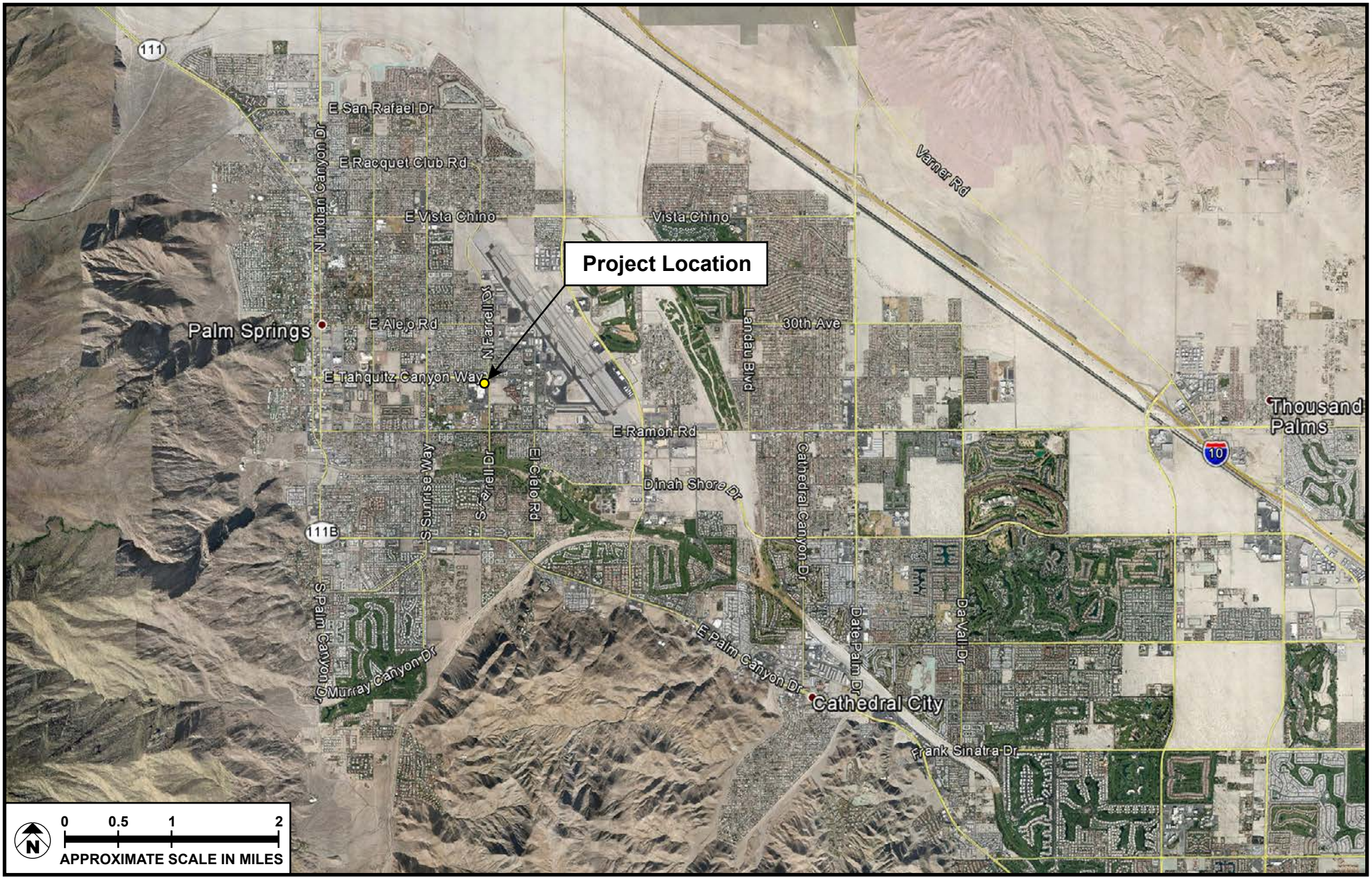
The cafeteria, which includes the main dining room and adjoining multipurpose room, is significant on a local level for its distinctive characteristics of Mid-Century Modern architecture. While the building has been altered over the years, it has retained sufficient integrity of its unusual design to convey its architectural significance and be considered eligible for listing in the California Register under Criteria 3.[4]

Library

Also designed by Emerson Stewart Williams, the library is a good example of the International Style of Modern Architecture. Constructed in 1959, this building was also constructed with a full glass curtain wall so that the main reading room could be engaged with the natural surroundings and landscape. The entrance doors, and surrounding façade, are comprised of large glass panes held in brushed aluminum frames. The interior of the library was created in the simplest of designs using a horizontal emphasis, and nonintruding fixtures. There have been minor changes to the building over the years, but they have not compromised the building's ability to convey its architectural significance. This building appears eligible for listing in the California Register.[5]

4 Daly & Associates, *Final HRA Report* (March 2013).

5 Daly & Associates, *Historic Resources Assessment Memo* (July 2019).



SOURCE: Google Earth - 2019; Meridian Consultants, LLC - 2019

FIGURE **2.0-1**

Meridian Consultants

Regional Location Map

049-010-18

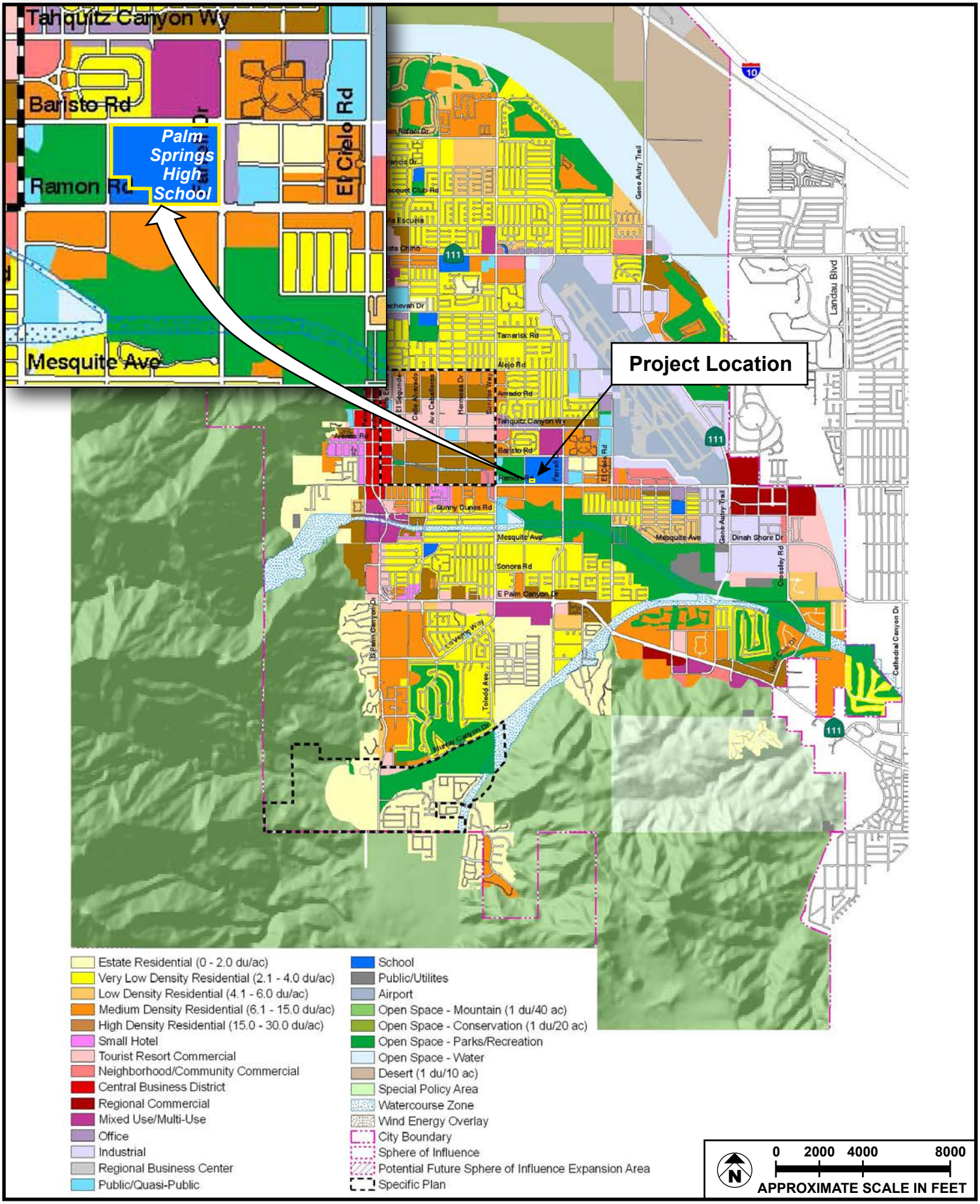
SOURCE: Google Earth—2019; Meridian Consultants—2019

FIGURE **2.0-2**

Meridian Consultants

Project Location Map

049-010-18



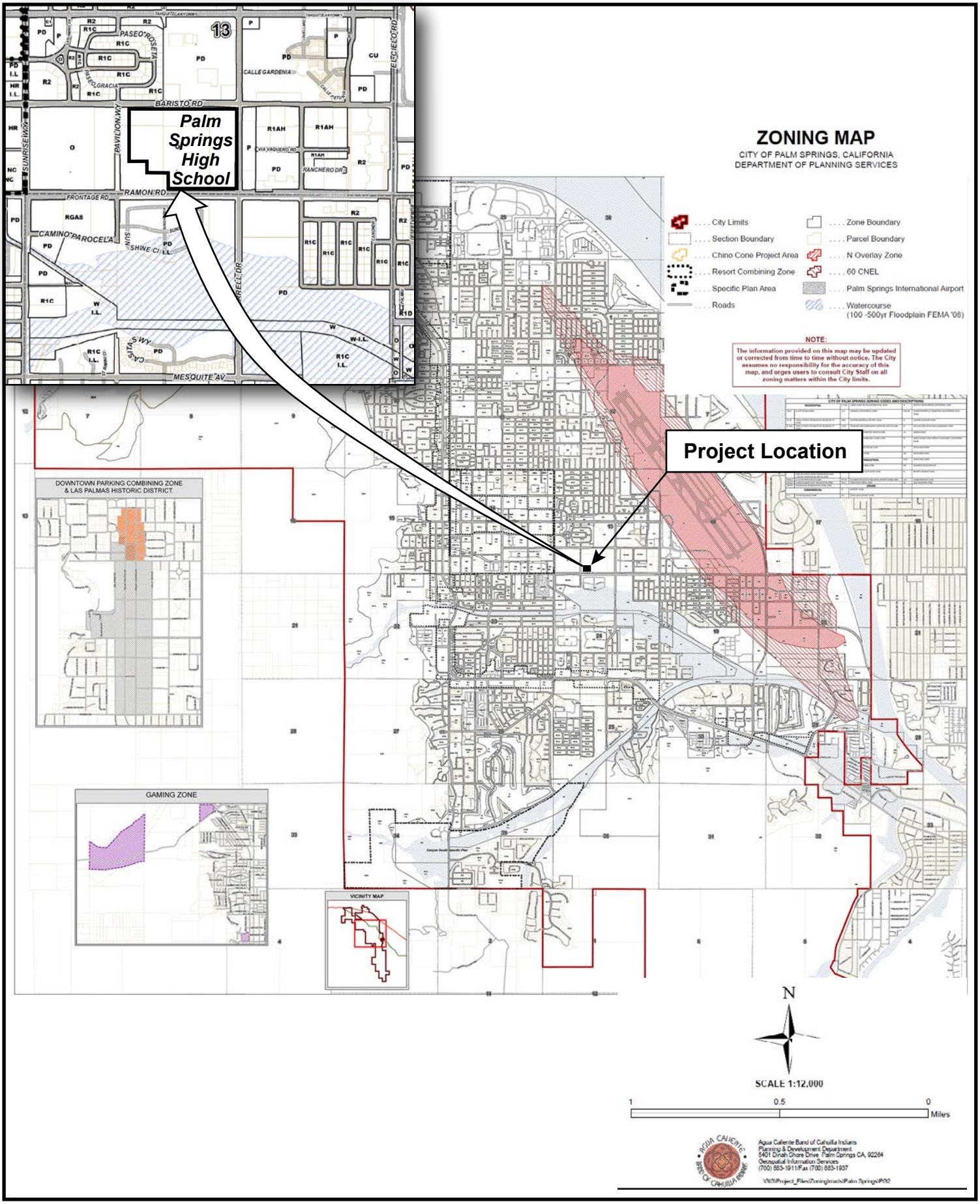
SOURCE: City of Palm Springs

FIGURE **2.0-3**

Meridian Consultants

Land Use Map

049-010-18



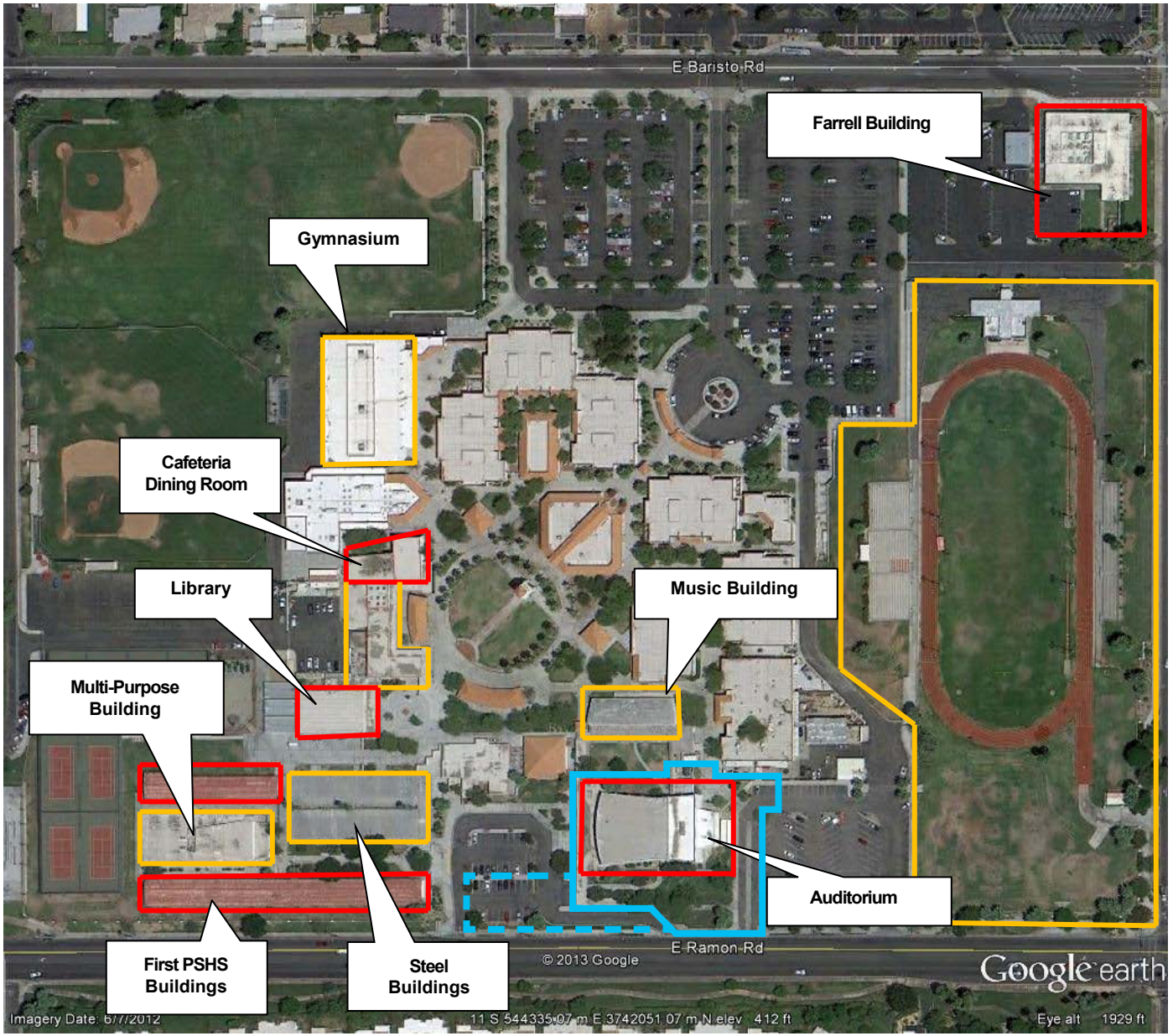
SOURCE: City of Palm Springs

FIGURE **2.0-4**

Meridian Consultants

Zoning Map

049-010-18



SOURCE: Daly & Associates—March 2013

FIGURE **2.0-5**

Meridian Consultants

Palm Springs High School and Desert Learning Academy Site Plan

049-010-18

TRIBAL CULTURAL RESOURCES[6]

In accordance with AB 52, the District provided notification to two California Native American tribes requesting consultation (pursuant to Public Resources Code Section 21080.3.1). Pursuant to this requirement, the District notified tribes (Agua Caliente Band of Cahuilla Indians and the Torres-Martinez Desert Cahuilla Indians) that have requested notification of the proposed Project under AB 52 (see Appendix E: AB 52 Tribal Consultation Letters). The letters notifying the tribes were mailed on September 16, 2019. The Agua Caliente Band of Cahuilla Indians and the Torres-Martinez Desert Cahuilla Indians tribe will have until October 16, 2019 to respond to the District identifying any potential TCRs of concerns.

The Project site has been previously disturbed and has been developed since the late 1930s with buildings and structures on the PSHS campus. Implementation of the proposed Project would not involve substantial ground disturbing activities during the demolition and site preparation construction phases.

Given this prior development of the campus, the presence of any documented cultural resources on the Project site is considered low, it is unlikely that demolition and construction, including earth disturbing activities, would identify any new potential TCRs of concern. However, as construction activities associated the proposed Project could still have the potential to unearth undocumented archaeological resources beneath the site, the District has taken into consideration in this IS/MND that there may be potential albeit low, that TCRS could be encountered during site ground disturbing activities. If any such TCRs are encountered, the District has included in the IS/MND provisions to address should that occur.

6 Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and Project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process (see PRC Section 20803.3.2). Information may also be available from the California Native American Heritage commission's Sacred Lands File per PRC Section 5097.96 and the California Historical Resources Information System administered by the California Office Historical Preservation. Please also note that PRC Section 20892.3(c) contains provisions specific to confidentiality.

3.0 PROJECT DESCRIPTION

OVERVIEW

The Palm Springs Unified School District (PSUSD) is proposing to implement various seismic upgrades and modernization improvements on the Palm Springs High School (PSHS) campus (proposed Project). Of those buildings that would undergo seismic upgrades and modernization improvements as part of the proposed Project include the: (1) library; (2) gymnasium; and (3) cafeteria. The proposed Project would include the renovation of these 3 buildings to meet current seismic standards modernization improvements, as well as the construction of a new 7,400-square-foot mini-gym within the cafeteria and the addition of a 1,950-square-foot lobby on the northeast corner of the gymnasium. Lastly, the proposed Project would involve various hardscape and landscaping improvements across the PSHS campus to improve existing drainage conditions. Implementation of the proposed Project would provide the PSHS campus with a range of upgraded and modern facilities that meet current standards.

BACKGROUND

The PSHS campus is one of the four high schools in the District. The PSHS campus located at 2401 East Baristo Road, is a four-year comprehensive high school. The PSHS currently serves a student population of approximately 1,700 students in grades 9 through 12 and approximately 85 staff members.

PROJECT CHARACTERISTICS

Building Improvements

The proposed Project includes a series of renovations and seismic upgrades across the PSHS campus, as shown in **Figure 3.0-1: Overall Site Plan**. In order to meet current code requirements, the District is proposing modernization improvements on the PSHS campus that would include various architectural, structural, fire/life/safety and accessibility upgrades. These proposed modernization improvements would be implemented to 3 existing buildings, including the library, gymnasium, and cafeteria, as shown in **Figure 3.0-2: Enlarged Site Plan**.

Modernization of each of the 3 buildings would focus on structural seismic reinforcements; interior finishes; heating, ventilation, and air conditioning (HVAC) improvements; acoustical treatments; the inclusion of fire sprinklers; light fixture updates; and various re-roofing improvements. Other improvements that would occur as part of these modernization efforts are discussed further below.

Specific improvements to the library would include interior reprogramming efforts that would provide students with a modern space containing the latest technology to facilitate group learning and sharing.

The proposed Project would also involve the remodel of the existing restroom facility to improve accessibility.

Improvements to the cafeteria would involve the replacement of food service equipment, and the reprogramming of spaces associated with the campus' Associated Student Body (ASB) portion of the building to promote the supervision of students. A new restroom facility would be added to the cafeteria. Lastly, implementation of the proposed Project would also include the addition of a 7,400-square-foot mini-gym along the western portion of the cafeteria.

Improvements to the gymnasium would provide for motorized telescopic stands and basketball backboards, as well the remodeling of the existing restroom facilities to improve accessibility. The gymnasium would also receive a 1,950-square-foot lobby addition on the northeast corner of the building.

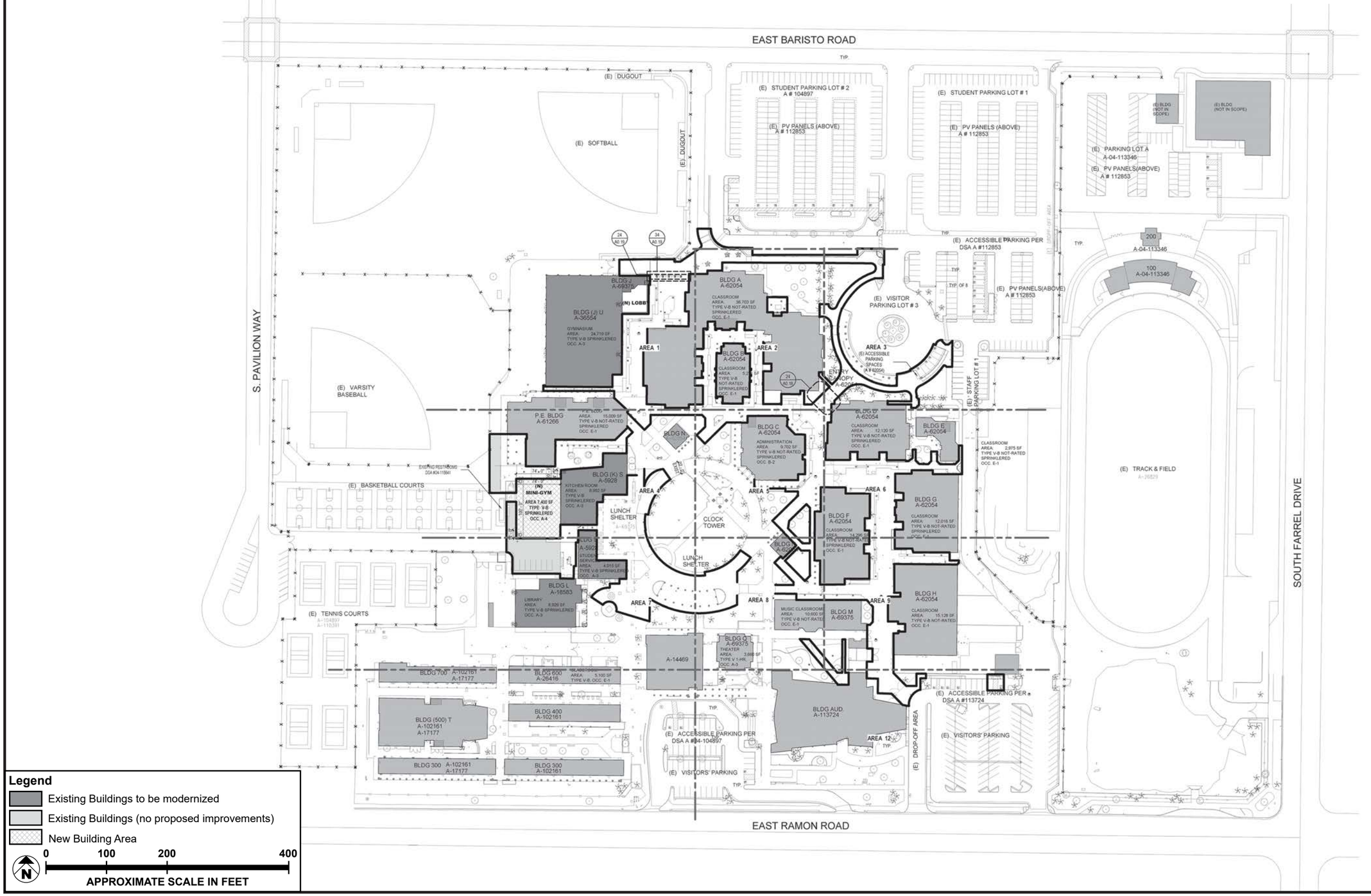
Landscaping and Drainage Improvements

Finally, the proposed Project would also include the redesigning of the existing hardscape and landscape within the center of the PSHS campus to redirect stormwater away from buildings and doorways. These improvements would improve existing drainage conditions on the Project site through the placement of new landscaped areas. Related landscaping improvements that would be implemented as part of the proposed Project include the use of cobbles and decomposed granite to provide permeability for stormwater to flow into drain inlets.

As shown in **Figure 3.0-3: Proposed Landscape Plan**, approximately 200,000 square feet of area on the Project site would be improved as part of the proposed Project, which includes approximately 15,000 square feet of asphalt paving. The drainage improvements would a have two-fold system. The primary system would consist of underground piping that will channel stormwater from collection points in the new landscaped areas and other catch basins throughout the Project site. This stormwater would then be routed to the detention basin at the southeast corner of the Project site where it can percolate back into the water table. In the event that the primary system fails, and underground piping becomes blocked with silt or debris, or overwhelmed by torrential rains, the secondary system would serve as a back-up. The secondary system would rely on the modifications made to the topography of the Project site as part of the proposed Project to allow stormwater to drain away from campus buildings.

Architectural Design

The proposed Project has been designed to preserve the historic interior and exterior character-defining features of the PSHS campus, particularly in regard to the library and cafeteria buildings which are significant historical resources. The renovated and new buildings would retain various characteristics of the existing buildings and would complement the other structures on the PSHS campus.



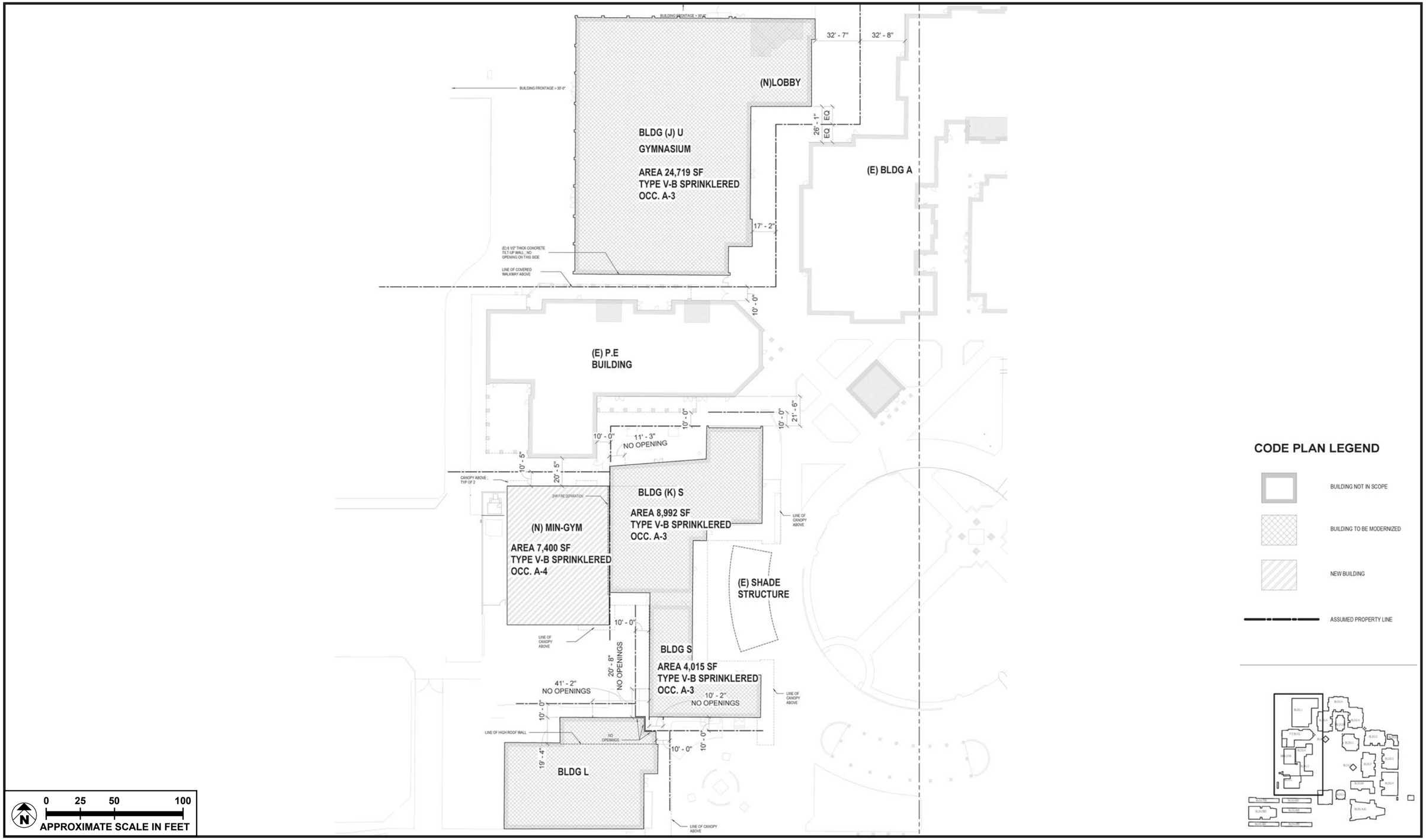
SOURCE: DLR - March 2019

FIGURE **3.0-1**

Meridian Consultants

Overall Site Plan

049-010-18



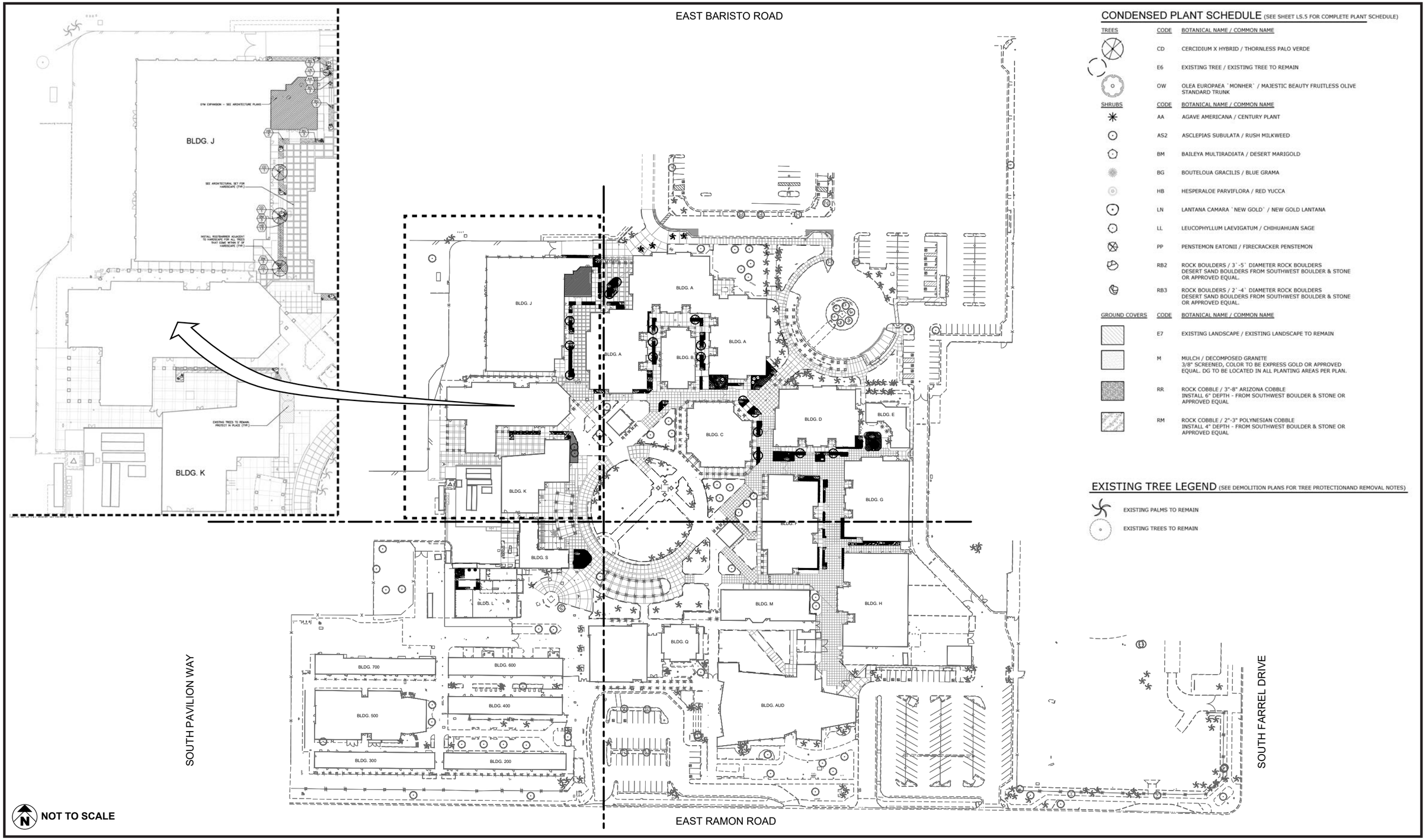
SOURCE: DLR - March 2019

FIGURE **3.0-2**

Meridian Consultants

Enlarged Site Plan

049-010-18



SOURCE: DLR - March 2019

FIGURE **3.0-3**

Meridian Consultants

Proposed Landscape Plan

049-010-18

The proposed improvements to the cafeteria building would extend to incorporating mechanical, electrical, and food service equipment upgrades in the dining and multipurpose rooms situated at the northern end of the sprawling building. The upgrades to the cafeteria kitchen and foodservice areas would be performed in compliance with California Department of State Architect (DSA) and the Riverside County Department of Environmental Health. The proposed Project would also include the adaptive reuse of the multipurpose room, formally used as a study hall and cafeteria dining that will now be incorporated into functional space for the new mini-gym facility.

The main dining room would undergo structural improvements based upon a significant effort made by Project architects, engineers, and preservation consultants, to design a support system for the feature window on the north wall of the dining room so that the building can withstand a major seismic event. The north wall of the dining room would receive additional support through the roof system of that room being tied to framing anchored to the main mass of the cafeteria complex. The engineering goals would be met by strengthening the internal framing of the complex, and by fortifying the exterior, concrete walls of the multipurpose room.

The proposed mini-gym facility would be constructed along the west elevation (rear/delivery elevation) of the cafeteria building. The west elevation currently serves as the receiving area for the kitchen and food services, and faces away from the campus core, and all campus pedestrian walkways. The design of the mini-gym addition would be differentiated from the existing cafeteria building through use of compatible materials (such as painted or slightly textured, concrete-masonry block) for the exterior walls of the gym addition. The new addition would be compatible with the cafeteria building complex in the size and scale. The north elevation of the mini-gym will be set back from the north elevation of the cafeteria building, so as not to visually detract from the cafeteria's exterior character-defining features along that elevation. An expansive, paved parking lot for the school currently extends to the west from the cafeteria's delivery bays.

Modernization of the library would allow for the rehabilitation of several historic aspects within the interior of the building, including the redesign of the soffit over the circulation desk that had been inappropriately altered from its original design, and re-installing period-appropriate brushed aluminum/steel entrance doors that had been removed at some point in time. The library's original, ceiling light fixtures would be re-wired and refitted with LED lights, which would retain the cohesive geometric design of the building's interior. Sound buffering panels would be installed on the interior walls using a hanging wall system, instead of simply gluing the panels to the walls, to avoid excessive damage to the wall surface if they are removed in the future. The awning over the front entranceway would be repaired with the removal of deteriorated support posts, which would be replaced with in-kind posts.

Construction

Construction of the proposed Project would take approximately 24 months, with a commencement date of spring 2020 and an estimated completion date of summer 2022. As shown in **Table 3.0-1: Project Construction Phasing**, the proposed Project would be constructed in four phases: (1) site preparation/grading, (2) new construction, (3) building renovations, and (4) landscaping and hardscaping improvements and architectural coating.

Table 3.0-1
Project Construction Phasing

Construction Phase	Approximate Duration
Site preparation/grading	3 months
New construction	6 months
Building renovations	9 months
Landscaping and hardscaping improvements and architectural coating	6 months

The site preparation/grading phase would include the removal of existing asphalt fill materials located around the areas proposed for new construction around the cafeteria and gymnasium buildings, and the subsequent replacement with properly compacted soil and fill. This phase of construction is anticipated to be completed in approximately 3 months.

The new construction phase would include construction of the new mini-gym along the western portion of the cafeteria and the lobby addition on the northeast corner of the gymnasium. This phase of construction is anticipated to be completed in approximately 6 months.

The building renovations phase would include the renovations to the library, gymnasium, and cafeteria buildings. These renovations that were previously discussed above would include structural seismic reinforcements; interior finishes; HVAC improvements; acoustical treatments; the inclusion of fire sprinklers; light fixture updates; and various re-roofing improvements. This phase of construction is anticipated to be completed in approximately 9 months.

The landscaping, hardscaping, and architectural coating phase would include final finishes and coating to the buildings, as well as the various landscaping and hardscaping improvements on the Project site. As previously discussed, this would involve the improvements of approximately 200,000 square feet of area on the Project site, which including approximately 15,000 square feet of asphalt paving. This phase of construction is anticipated to be completed in approximately 6 months.

As construction activities would be limited to the interior of the campus, street closures of nearby streets are not anticipated. Construction staging would occur on the existing campus parking lots, including the eastern, southern, and northern lots along South Pavilion Way, East Ramon Road, and East Baristo Road, respectively.

The PSHS campus would continue to operate during construction. As the renovations and seismic upgrades are completed and become available, an ongoing phased vacation and relocation of students and faculty into the updated campus facilities would occur. It is anticipated that the upgraded and modernized facilities on the PSHS campus would be completed and fully operational by start of the 2022–2023 school year.

Security would be provided by campus security guards and campus police during construction. All construction workers would be required to wear identification badges and check in through the school office prior to each day's construction activities. As the areas proposed for improvements are surrounded by various campus buildings and facilities, which are by locked gates, temporary fencing surrounding the Project site's construction area perimeter may be implemented in an effort to provide additional security and safety measures.

SCHOOL BOARD REQUESTED ACTIONS

The District is requesting the approval of the following action, as described previously:

- Adoption of the Mitigated Negative Declaration
- Adoption of the Mitigation Monitoring Plan
- Approval of the Project

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this Project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐	Aesthetics	☐	Agriculture and Forestry	☐	Air Quality
☐	Biological Resources	☐	Cultural Resources	☐	Energy
☐	Geology/Soils	☐	Greenhouse Gas Emissions	☐	Hazards & 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

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
Julie Arthur, Executive Director
Facilities Planning and Development

9-30-19
Date

SPECIAL REQUIREMENTS UNDER THE STATE SCHOOL FACILITY PROGRAM

In addition to the general environmental checklist provided by Appendix G of the State *CEQA Guidelines*, projects involving primary and secondary public schools have several additional requirements established by the California Education Code (EDC), California Code of Regulations (CCR), and the Public Resources Code (PRC) as shown in **Table 4.0-1: Environmental Review Factors for State-Funded New School and State-Funded Addition to Existing School**. These requirements vary by type of school project and whether State funds are involved. The following table identifies the specific requirements for a State-funded new school or a State-funded addition to an existing school site.

Table 4.0-1
Environmental Review Factors for State-Funded New School and State-Funded Addition to Existing School

Topic	Applicable Code
Air Quality	
Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School?	PRC §21151.8(a)(1)(D); EDC §17213(c)(2)(C)
Geology and Soils	
Does the site contain an active earthquake fault or fault trace, or is the site located within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan?	EDC §17212; 5 CCR §14010(f)
Would the project involve the construction, reconstruction, or relocation of any school building on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building?	EDC §17212; 5 CCR §14010(f)
Would the project involve the construction, reconstruction, or relocation of any school building on a site subject to moderate-to-high liquefaction?	5 CCR §14010(i)
Would the project involve the construction, reconstruction, or relocation of any school building on a site subject to landslides?	5 CCR 5 §14010(i)
Hazards and Hazardous Materials	
Does the proposed school site contain one or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood?	PRC §21151.8(a)(1)(C)
Is the proposed school site located near an aboveground water or fuel storage tank or within 1,500 feet of an easement of an aboveground or underground pipeline that can pose a safety hazard to the site?	5 CCR §14010(h)
Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste?	PRC §21151.8(a)(2); EDC §17213(b)

Topic	Applicable Code
Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site? *(Does not apply to school sites approved by CDE prior to January 1, 1997.)*	EDC §17215.5(a)
Is the property line of the proposed school site less than the following distances from the edge of respective power line easements: (1) 100 feet of a 50–133 kV line; (2) 150 feet of a 220–230 kV line; or (3) 350 feet of a 500–550 kV line?	5 CCR §14010(c)
Does the Project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?	PRC §21151.8(a)(1)(A)
Is the Project site a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to §25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code?	PRC §21151.8(a)(1)(B)
If prepared, has the risk assessment been performed with a focus on children's health posed by a hazardous materials release or threatened release, or the presence of naturally occurring hazardous materials on the school site?	EDC §17210.1(a)(3)
If a response action is necessary and proposed as part of this project, has it been developed to be protective of children's health, with an ample margin of safety?	EDC §17210.1(a)(4)
Is the proposed school site situated within 2,000 feet of a significant disposal of hazardous waste?	5 CCR §14010(t)
Is the proposed school site within two miles, measured by air line, of that point on an airport runway or potential runway included in an airport master plan that is nearest to the site? *(Does not apply to school sites acquired prior to January 1, 1966.)*	EDC §17215(a)&(b)
Hydrology and Water Quality	
Is the Project site subject to flooding or dam inundation?	EDC §17212; 5 CCR §14010(g)
Land Use and Planning	
Would the proposed school conflict with any existing or proposed land uses, such that a potential health or safety risk to students would be created?	5 CCR §14010(m)
Noise	
Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the educational program?	5 CCR §14010 (e)
Public Services	
Does the site promote joint use of parks, libraries, museums, and other public services?	5 CCR §14010(o)
Traffic and Transportation	
Are traffic and pedestrian hazards mitigated per Caltrans' *School Area Pedestrian Safety* manual?	5 CCR §14010(l)
Is the site easily accessible from arterials and is the minimum peripheral visibility maintained for driveways per Caltrans' *Highway Design Manual*?	5 CCR §14010(k)
Is the proposed school site within 1,500 feet of a railroad track easement?	5 CCR §14010(d)

5.0 ENVIRONMENTAL ANALYSIS

EVALUATION OF ENVIRONMENTAL IMPACTS:

1. A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).

2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.

3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

4. "Negative Declaration: Less than Significant with Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less than Significant Impact." The lead agency must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or Negative Declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:

    a. Earlier Analysis Used. Identify and state where they are available for review.

    b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.

    c. Mitigation Measures. For effects that are "Less than Significant with Project Mitigation," describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or

outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used, or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
    a. the significance criteria or threshold, if any, used to evaluate each question; and
    b. the mitigation measure identified, if any, to reduce the impact to less than significant.

INITIAL STUDY CHECKLIST

5.1 AESTHETICS

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the Project:				
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. Have a substantial adverse effect on a scenic vista?

Less than Significant Impact. Scenic vistas are typically views of features such as mountains, forests, the ocean, or urban skylines. The City is bordered by the San Bernardino Mountains to the north, the Santa Rosa Mountains to the south, the San Jacinto Mountains to the west; and the Little San Bernardino Mountains to the east. Views of the Santa Rosa Mountains and the San Bernardino Mountains are identified in the City's General Plan as significant scenic landmarks.[7] Views of the San Jacinto Mountains and the Santa Rosa Mountains are visible from the campus. However, the buildings on the Project site proposed for seismic upgrades and modernization improvements are located within the interior of the campus, with school buildings surrounding on all sides. As such, there are no perceivable views of these existing buildings from off-site uses.

Implementation of the proposed Project would consist of seismic upgrades and modernization improvements to the existing cafeteria, library, and gymnasium buildings on the PSHS campus. The facilities will stay as similar uses and be within the same locations on the Project site. The renovated

7 City of Palm Springs, *General Plan,* "Recreation, Open Space and Conservation Element" (2007), accessed July 2019, http://www.palmspringsca.gov/home/showdocument?id=1981.

buildings as a whole will stay the same height and would not affect existing views of the surrounding mountains. In addition, the new mini-gym that would be added to the cafeteria building would be of similar height and scale, and would therefore not obstruct any additional views across the Project site. Thus, views of scenic vistas would remain similar to existing conditions. Additionally, the elevations of the surrounding mountains would remain to provide a scenic backdrop to the campus without detriment from development of the proposed Project.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

Less than Significant Impact with Project Mitigation. California's Scenic Highway Program classifies SR 111 as an "Eligible Scenic Highway-Not Officially Designated" scenic highway.[8] The City's Circulation Element, notes that the majority of the City's roadway provide views to the San Jacinto and Santa Rosa Mountains. Although they are not designated by the State as scenic highways, the City's roadways provide a valuable visual resource for the community.[9]

The Project site is approximately 1.25 miles southwest of SR 111 and is not visible from the highway. Westerly views of the San Jacinto Mountains are visible from SR 111. Additionally, the campus is not visible from the SR 111 due to existing development and trees surrounding the highway. Development of the proposed Project would not be visible from SR 111, and no impacts to scenic highways would occur.

The Project site does not contain any scenic resources, such as rock outcroppings or trees, that would be damaged by the proposed Project; however, the Project proposes to modernize two historic buildings. The cafeteria building complex, is significant on a local level for its distinctive characteristics of Mid-Century Modern Architecture. While the building has been minimally altered over the years, it has retained sufficient integrity of its unusual design to convey its architectural significance and be determined eligible for listing in the CRHR. The PSHS library has been determined eligible for listing in the CRHR as a good example of the International style of Modern Architecture. There have been minor changes to the interior of the building over the years, but they have not compromised the buildings ability to convey its

8 California Department of Transportation, *California Scenic Highway Mapping System,* "Riverside County," accessed July 2019, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

9 City of Palm Springs, *General Plan,* "Circulation Element" (2007), accessed July 2019, http://www.palmspringsca.gov/home/showdocument?id=1973.

architectural significance.[10] In addition, while the City identifies in its *2004 Historic Resources Survey* and associated *Citywide Reconnaissance Survey Master List* various buildings on the campus that may be potentially historic; however, the City does not specifically identify the library, gymnasium, or cafeteria as significant historical resources within its survey, nor are any of the existing buildings identified on the City's list of properties listed on the NRHP.[11,12,13]

As discussed in **Section 5.5: Cultural Resources**, the Historic Resources Assessment Memo (see **Appendix C: Historical Resources Background Data**) identified that the proposed improvements to the cafeteria and library buildings will not result in a substantial adverse changes that would affect their ability to retain their individual eligibility for listing in the CRHR. However, to ensure that the historic features of the cafeteria and library are preserved throughout implementation of the proposed Project, **Mitigation Measures CUL-1** through **CUL-3** have been identified to reduce potential impacts to the historic resources to a level of less than significant.

Impacts would be less than significant.

Mitigation Measures: **Mitigation Measures CUL-1** through **CUL-3** have been identified to reduce impacts to less than significant.

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?

Less than Significant Impact. The Project site is currently developed with existing school facilities on the joint PSHS-DLA campus. The joint PSHS-DLA campus consists of a number of buildings and structures, staff and visitor parking areas, and other hardscape and landscape features. Development of the proposed Project would implement upgrades and modernize three existing buildings on campus. The proposed Project would also include development of a new mini-gym as an addition to the existing cafeteria building. The buildings would retain the characteristics of the existing structure and would complement the other

10 Daly & Associates, *Historic Resources Assessment Memo* (July 2019).
11 City of Palm Springs, *Historic Resources Survey, Final Draft Summary Report* (June 2004), accessed September 2019, http://www.palmspringsca.gov/home/showdocument?id=235.
12 City of Palm Springs, *Citywide Reconnaissance Survey Master List* (June 2004), prepared by ARG, accessed September 2019, http://www.palmspringsca.gov/home/showdocument?id=234.
13 City of Palm Springs, Department of Planning Services, Historic Site Preservation Board, "Class 1 and Class 2 Historic Sites, Historic Districts, and Properties Listed on the National Register of Historic Places" (Revised April 11, 2018), accessed 2019, http://www.palmspringsca.gov/home/showdocument?id=58223.

structures on the PSHS campus. The modernized buildings would conform to the general aesthetics of the campus, as well as the existing massing and scale.

The proposed Project would maintain the existing overall aesthetic character of the campus and conform to the aesthetic design of the existing campus.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Create a new source of substantial light or glare, which would adversely affect day or nighttime views in the area?

Less than Significant Impact. The proposed Project includes seismic upgrades and modernization improvements to existing buildings on the PSHS campus. Sources of light exist within the confines of the campus, including the Project site, are related to surrounding buildings and parking areas. Other sources of light and glare exist off the campus in the Project area including streetlights along adjacent streets and light sources from adjacent uses.

The proposed Project would involve various light fixture updates to the library, gymnasium, and cafeteria buildings, as well as the addition of the mini-gym to the cafeteria. Sources of light and glare would be similar compared to existing conditions but would be updated in accordance with current design practices. Such design practices require the use of shielding features to direct lighting downwards and minimize off-site impacts on surrounding uses. In addition, the proposed seismic and modernization improvements implemented under the proposed Project would include the use of building materials that would consist of nonreflective, textured surfaces and nonreflective glass to minimize the creation of daytime glare that could affect nearby sensitive uses.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

5.2 AGRICULTURE AND FORESTRY RESOURCES

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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 Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the Project:				
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 nonagricultural use?	☐	☐	☐	☒
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c. Conflict with existing zoning for, or cause rezoning of, forestland (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 forestland or conversion of forestland to nonforest use?	☐	☐	☐	☒
e. Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to nonagricultural use, or conversion of forestland to nonforest use?	☐	☐	☐	☒

Discussion

a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?

No Impact. The Project site consists of a developed school campus and is bound by commercial and office space to the north; commercial, residential, and office space to the east; single-family residential units to the south; and recreation and commercial space to the west.

According to the California Department of Conservation "Riverside County Important Farmland 2016" map, the Project site is designated as "urban and built-up land."[14] No portion of the Project site is designated as Farmland of Statewide Importance, Unique Farmland, or Farmland of Local Importance. The Project site and surrounding development are not currently used for agricultural use.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

b. Conflict with existing zoning for agricultural use, or Williamson Act Contract?

No Impact. As previously noted, the Project site and surrounding development are fully developed, and not in agricultural use not currently used for agricultural use. The Project site is not designated or zoned for agricultural use, used for agriculture, or subject to a Williamson Act contract. There are no designated agricultural land uses or Williamson Act contracts in use adjacent to or in proximity of the Project site.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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))?

No Impact. The Project site is not designated or zoned for forest or timberland or used for foresting. As stated before, the Project site is in an urbanized area of the City and surrounding land uses consisting of school, residential, recreation, and commercial space.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

14 California Department of Conservation, Division of Land Resource Protection, *Riverside County Important Farmland 2016,* map, sheet 2 of 3 (July 2017), accessed July 2019, available at https://www.conservation.ca.gov/dlrp/fmmp.

d. Result in the loss of forestland or conversion of forestland to nonforest use?

No Impact. The Project site is not designated or zoned for forest or timberland or used for foresting. Additionally, the Project site is in an urbanized area of the City and is not within any forestland area.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

e. Involve other changes in the existing environment which, due to their location or nature could result in conversion of Farmland, to nonagricultural use or conversion of forestland to nonforest use?

No Impact. As previously noted, the site does not contain any farmland or forestland; therefore, no such land would be converted. Proposed development would involve various seismic upgrades and modernization improvements, including the construction of a new mini-gym. All proposed Project development would occur within the Project site, which is located on the developed campus.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

5.3 AIR QUALITY

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
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:				
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 nonattainment under an applicable federal or State ambient air quality standard?	☐	☐	☒	☐
c. Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d. Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School?	☐	☐	☒	☐
e. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Discussion

a. Conflict with or obstruct implementation of the applicable air quality plan?

Less than Significant Impact. A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the air quality management plan (AQMP). This determination fulfills the CEQA goal in informing decision makers of the environmental efforts of the project under consideration at an early enough stage to ensure that air quality concerns are fully addressed. It also provides the local agency with ongoing information as to whether they are contributing to clean air goals contained in the AQMP. Projects that are consistent with local general plans are considered consistent with the air quality related regional plans including the current AQMP, the Coachella Valley PM10 State Implementation Plan, and other applicable regional plans. The most recent adopted comprehensive plan is the 2016 AQMP, which was released March 2017 by the South Coast Air Quality

Management District (SCAQMD), in which the Project site is located.[15]

The Project site is located in the Salton Sea Air Basin (SSAB). The SSAB comprises of a portion of the SCAQMD, which consists of the central portion of Riverside County (the Coachella Valley) and Imperial County Air Pollution Control District. Regional growth projections are used by SCAQMD to forecast future emission levels in the SSAB. For Southern California, these regional growth projections are provided by the Southern California Association of Governments 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.

The proposed Project would not result in any population growth as the Project would not result in additional students. The proposed Project would not affect the regional emissions inventory or conflict with strategies in the AQMP to attain the Ambient Air Quality Standards. Additionally, the regional emissions generated by construction and operation of the proposed Project would be less than the SCAQMD emissions thresholds (refer to **Table 5.3-1: Maximum Construction Emissions** and **Table 5.3-2: Maximum Operational Emissions**) and would not be considered by SCAQMD to be a substantial source of air pollutant emissions. The proposed Project would not conflict or obstruct implementation of the AQMP.

Construction Emissions

The construction emissions for the proposed Project were calculated according to the SCAQMD's *CEQA Air Quality Handbook* (Handbook)[16] and construction emission factors contained in the California Emissions Estimator Model (CalEEMod), version 2016.3.2. The analysis assumes that all construction equipment and activities would occur continuously over the day and that activities would overlap. In reality, this would not occur as most equipment would operate only a fraction of each workday and many of the activities would not overlap on a daily basis. In addition, for purposes of a conservative analysis, the unmitigated values for construction are shown below.

As shown in **Table 5.3-1**, construction emissions of the proposed Project would not exceed SCAQMD regional construction thresholds for all criteria pollutants. In addition, construction-related emissions would further be minimized through best development practices and adherence to SCAQMD local regulations such as: Rule 403–Fugitive Dust, Rule 403.1–Supplemental Fugitive Dust Control Requirements for Coachella Valley Sources, and Rule 1113–Architectural Coating.

---

15 South Coast Air Quality Management District (SCAQMD), *Final 2016 Air Quality Management Plan* (March 2017), accessed September 2019, http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf.

16 SCAQMD, *CEQA Air Quality Handbook* (April 1993).

Table 5.3-1
Maximum Construction Emissions

Source	ROG	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Unmitigated maximum	7	9	8	<1	1	1
SCAQMD threshold	75	100	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

*Notes: Refer to **Appendix B.2: Summer** and **Appendix B.3: Winter**, 2.1: Overall Operation.*
CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic compounds; SOx = sulfur oxide.

Operational Emissions

As mentioned previously, the proposed Project would include renovations to the library, gymnasium, and cafeteria buildings, as well as the construction of a new 7,400-square-foot mini-gym within the cafeteria and the addition of a 1,950-square-foot lobby on the northeast corner of the gymnasium. Stationary emissions would be generated by the consumption of natural gas for space and water heating equipment. The proposed Project would not result in an addition of new students and trips; therefore, mobile emissions would be negligible. The analysis of daily operational emissions has been prepared using the data and methodologies identified in the SCAQMD Handbook and the CalEEMod model and are presented in **Table 5.3-2.** As shown in **Table 5.3-2**, the proposed renovations and improvements would not exceed the regional thresholds of significance set by the SCAQMD. As a result, operational emissions would be less than significant.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

Table 5.3-2
Maximum Operational Emissions

Source	ROG	NOx	CO	SOx	PM10	PM2.5
	pounds/day					
Area	<1	<1	<1	<1	<1	<1
Energy	<1	<1	<1	<1	<1	<1
Mobile	0	0	0	0	0	0
Total	<1	<1	<1	<1	<1	<1
SCAQMD threshold	75	100	550	150	150	55
Threshold exceeded?	**No**	**No**	**No**	**No**	**No**	**No**

*Notes: Refer to **Appendix B.2** and **Appendix B.3**, 2.2: Overall Operation.*
CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns; ROG = reactive organic compounds; SOx = sulfur oxide.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard?

Less than Significant Impact. The Coachella Valley is designated by the California Air Resources Board (CARB) as extreme nonattainment for ozone and nonattainment for PM10, based on exceedances of both the State 1-hour and 8-hour for ozone and 24-hour and annual average standards for PM10.[17] Adherence to the SCAQMD rules and regulations and compliance with locally adopted AQMP and PM10 State Implementation Plan control measures will help reduce the pollutant burden contributed by the individual development project. Appropriate air quality measures are required by the City of Palm Springs and implemented through enforcement of the City's Municipal Code consistent with SCAQMD Rules 403 and 403.1.[18]

In regard to determining the significance of the Project contribution, the SCAQMD neither recommends quantified analyses of construction and/or operational emissions from multiple development projects nor provides methodologies or thresholds of significance to be used to assess the cumulative emissions generated by multiple cumulative projects. Instead, the SCAQMD recommends that a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project-specific impacts. Furthermore, SCAQMD states that if an individual development project generates less than significant construction or operational emissions, then the development project would not generate a cumulatively considerable increase in emissions for those pollutants for which the SSAB is in nonattainment. As discussed above, the proposed Project would not generate construction and operational emissions that exceed the SCAQMD's recommended regional thresholds of significance. Therefore, the renovations and improvements of the Project would not generate a cumulative considerable increase in emissions of the pollutants for which the SSAB in in nonattainment.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Expose sensitive receptors to substantial pollutant concentrations?

Less than Significant Impact. As shown in **Table 5.3-1** and **Table 5.3-2**, construction and operational emissions would be below the SCAQMD regional thresholds. However, concentrations of pollutants may have the potential to impact nearby sensitive receptors. Sensitive receptors are defined as schools,

17 California Air Resources Board (CARB), "Area Designations Maps/State and National," accessed January 2019, http://www.arb.ca.gov/desig/adm/adm.htm.

18 City of Palm Springs, Municipal Code, tit. 8, Buildings and Construction.

residential homes, hospitals, resident care facilities, daycare centers or other facilities that may house individuals with health conditions that would be adversely impacted by changes in air quality. The Project site is bound all on sides by school uses with single-family residences to the south across Ramon Road. Therefore, the surrounding school uses represents the closest sensitive uses to the proposed Project.

SCAQMD has divided its jurisdictional territory of the SSAB into 38 Source Receptor Areas (SRAs), most of which have monitoring stations that collect air quality data. These SRAs are designated to provide a general representation of the local meteorological, terrain, and air quality conditions within the particular geographical area. These geographical areas include urbanized regions, interior valleys, coastal areas, and mountains. The SCAQMD provides screening criteria for distances of 25, 50, 100, 200 and 500 meters and allows for linear interpolation to estimate the screening criteria between these distances. The Project site is located in the Coachella Valley SRA (SRA 30).[19]

Table 5.3-3: Localized Significance Threshold (LST) Worst-Case Emissions shows the maximum localized emissions during baseline on-site construction and operation of the Project.

Table 5.3-3
Localized Significance Threshold (LST) Worst-Case Emissions

Source	NOx	CO	PM10	PM2.5
	pounds/day			
Construction				
Maximum Unmitigated On-Site Emissions	9	7	1	<1
LST threshold	105	689	3	2
Threshold exceeded?	**No**	**No**	**No**	**No**
Operational				
Project area/energy emissions	<1	<1	<1	<1
LST threshold	105	689	1	1
Threshold exceeded?	**No**	**No**	**No**	**No**

*Source: Refer to **Appendix B.2** and **Appendix B.3**, 2.2: Overall Operation and 3.2–3.7: Construction Detail.*
Notes: CO = carbon monoxide; NOx = nitrogen oxide; PM10 = particulate matter less than 10 microns; PM2.5 = particulate matter less than 2.5 microns.

As shown, the localized emissions for sensitive receptors would not exceed LST for NOx, CO, PM10, and PM2.5. In addition, construction phases that occur when school is in session, specifically those that

19 SCAQMD, *General Forecast Areas and Air Monitoring Areas*, map, accessed January 2019, http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf.

generate increase air emissions such as demolition and building construction, students would be in the classrooms for the majority of school hours. Classroom doors and windows would be closed at all times and any form of pollutants would not enter into the classrooms. Areas where outdoor activities occur (physical education classes, lunch and nutrition break) are primarily located at a sufficient (several hundred feet) distance from the Project site. To avoid risk of students being exposed to pollutants during outdoor events, classes and outdoor activity areas can be temporarily relocated to other campus locations away from the Project site. Nearby sensitive receptors and students would avoid exposure to criteria pollutants (if any) associated with construction activities.

Toxic Air Contaminants

Project construction would result in short-term emissions of diesel particulate matter, which is a toxic air contaminant (TAC). Diesel particulate matter poses a carcinogenic health risk that is generally measured using an exposure period of 30 years for sensitive residential receptors. Off-road heavy-duty diesel equipment would emit diesel particulate matter over the course of the construction period. Localized diesel particulate matter emissions (strongly correlated with PM2.5 emissions) would be minimal and would be substantially below localized thresholds as presented in **Table 5.3-3**.

While the proposed Project would result in a generally low level of diesel particulate emissions, it is recommended that construction activities utilize equipment that meet the USEPA Tier 3 emissions standards and are equipped with CARB certified Level 3 Diesel Particulate Filter or equivalent control device. This would include the use of off-road, diesel-fueled, heavy-duty construction equipment greater than 50 horsepower used for this Project and located on the Project site for a total of five (5) days or more with a minimum US Environmental Protection Agency Tier 3 emissions standards or better (as commercially available) and outfitted with Best Available Control Technology devices, including a CARB certified Level 3 Diesel Particulate Filter or equivalent control device. This would be expected to reduce diesel particulate matter by approximately 85 percent or more.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Is the boundary of the proposed (school) site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School?

Less than Significant Impact. As described above, the proposed Project would include improvements and renovations of the existing school, located approximately 1.45 miles west of SR 111, but along Ramon

Road, a major thoroughfare in the City.[20] The proposed Project would not result in an increase of students, thus would not result in an increase in traffic. As shown above, the proposed Project would not generate construction and operational emissions that exceed the SCAQMD's recommended regional and localized thresholds of significance. As such, air quality emissions with respect to TACs would not pose a health risk to students, faculty, or visitors to the Project site.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less than Significant Impact. According to SCAQMD, while almost any source may emit objectionable odors, some land uses will be more likely to produce odors because of their operation.[21] Land uses that are more likely to produce odors include agriculture, chemical plants, composting operations, dairies, fiberglass molding, landfills, refineries, rendering plants, rail yards, and wastewater treatment plants.

As the proposed Project involves no elements related to these types of activities, no odors are anticipated. During the construction phase for the proposed Project, activities associated with the operation of construction equipment, the application of asphalt, the application of architectural coatings, and other interior and exterior finishes may produce discernible odors typical of most construction sites. Although these odors could be a source of nuisance to adjacent receptors, they are temporary and intermittent in nature. As construction-related emissions dissipate from the construction area, the odors associated with these emissions would also decrease, dilute, and become unnoticeable.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

20 City of Palm Springs, *General Plan,* "Circulation Element."
21 SCAQMD, *CEQA Air Quality Handbook*.

5.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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 Game or US 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 Game or US 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?	☐	☐	☐	☒

Discussion

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 Game or US Fish and Wildlife Service?

Less than Significant Impact. 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 Game; and plant species listed as rare by the California Native Plant Society.

The Project site is comprised of a developed and urbanized area of the City. The Project site does not contain undisturbed habitat areas. No rare plant or animal species have been previously recorded as specifically existing on the Project site; however, the following species have been documented within the area of the Project Site:[22]

- Prairie falcon (*Falco mexicanus*): found within a 0.2-mile radius of the Project site vicinity. This species is State listed as threatened and globally ranked G5[23] and State ranked S4.[24] This species' habitat includes open country, especially arid, and high desert. This species is presumed to be extant.
- Coastal California gnatcatcher (*Polioptila californica californica*): found within the Project site vicinity. This species is State listed as threatened and globally ranked G4G5T2Q[25] and State ranked S2.[26] This species' habitat includes dense coastal sage scrub growth. This species is presumed to be extant.

As previously stated, the Project site is a developed high school campus. The site is fully developed and does not contain any habitats that provide for candidate, sensitive, or special status species. The existing landscaping within the PSHS campus is ornamental and nonnative. There are no native habitats, sensitive natural communities, or riparian habitats on or in the vicinity of the Project site. Additionally, the National Wetlands Mapper does not show any federally protected streams, wetlands or other water bodies, or any riparian habitat on site or adjacent to the Project site.[27]

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

22 California Department of Fish and Wildlife, California Natural Diversity Database, *RareFind,* database, accessed July 2019, https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data.
23 G5 Definition: Secure—Common; widespread and abundant.
24 S4 Definition: Apparently Secure—Uncommon but not rare; some cause for long-term concern due to declines or other factors.
25 G4 Definition: Apparently Secure—Uncommon but not rare; some cause for long-term concern due to declines or other factors.
26 S2 Definition: Imperiled—Imperiled in the State because of rarity due to very restricted range, very few populations (often 20 or fewer), steep declines, or other factors, making it very vulnerable to extirpation from the nation or State.
27 United States Fish and Wildlife Service (USFWS), *National Wetlands Mapper,* accessed July 2019, https://www.fws.gov/wetlands/data/mapper.html.

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 Game or US Fish and Wildlife Service?

No Impact. The Project site is comprised of a developed high school campus. The surrounding area is completely developed and disturbed. No riparian habitat or sensitive natural community is located in the surrounding area or on the Project site.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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?

No Impact. The Project site is comprised of a developed high school campus. The Project site is neither in proximity to, nor does it contain, wetland habitat or a blue line stream. Implementation of the proposed Project would not 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.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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?

No Impact. The Project site is located in an urbanized area of the City and is surrounded by school, residential, commercial, and recreational development. The Project site is comprised of a developed high school campus. The existing landscaping on site is ornamental and nonnative. The Project site is not available for overland wildlife migration. The ornamental trees and shrubs on the Project site may provide suitable habitat, including nesting habitat, for migratory birds. However, Project development would not include the removal or disturbance of any trees.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

No Impact. The City recognizes the importance of trees. The City's General Plan recognizes trees as an important in providing aesthetic appeal throughout the City.[28] In addition, the General Plan recognizes that the preservation of trees should be implemented when implementing and or replacing new facilities.[29] The City of Palm Springs Municipal Code does not does not contain ordinances protecting trees; however, the City's Municipal Code states that any species of wildlife, nests, and eggs should not be killed or molested without proper documentation or permit.[30] The Project Site and surrounding area do not contain any trees of special status that are known to provide viable habitat to various wildlife. However, implementation of the proposed Project would protect existing trees to the extent feasible. In order to avoid disturbance to existing trees on the Project site, tree protection barriers would be installed around existing trees after ground clearing activities. The District's construction contractor would notify the District of any trees identified for removal to facilitate development of the proposed Project. The removal and placement of these trees would be subject to the review and approval of the City. As such, implementation of the proposed Project would not conflict with any local policies or ordinances protecting biological resources.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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?

No Impact. The City (including the Project site) is within the boundaries of and covered by the Coachella Valley Multispecies Habitat Conservation Plan (CVMSHCP).[31] The Project site is already developed and is not in an area designated as a preserve under the CVMSHCP. The proposed Project would not conflict with the provisions of the CVMSHCP, any other adopted Habitat Conservation Plan, Natural Community Conservation Plan, or any other approved local, regional, or State habitat conservation plan.

No impacts would occur.

Mitigation Measures: No mitigation measures are required

28 City of Palm Springs, General Plan, "Community Design Element" (2007), accessed July 2019, http://www.palmspringsca.gov/home/showdocument?id=1977.
29 City of Palm Springs, *General Plan,* "Recreation, Open Space and Conservation Element."
30 City of Palm Springs, Municipal Code, sec. 11.36.010, Wildlife Protection.
31 Coachella Valley Association of Governments, *Coachella Valley Coachella Valley Multiple Species Habitat Conservation Plan,* accessed July 2019, available at http://www.cvmshcp.org/.

5.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☒	☐	☐
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c. Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

Discussion

a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

Less than Significant Impact with Project Mitigation.

Overview of the Joint DLA-PSHS Campus

The first buildings on the joint DLA-PSHS campus were constructed in 1938-1939. A second wave of construction occurred in the mid-1950s and again in the 1990s, during which many of the early buildings were demolished, and the campus was completely redesigned and realigned to face East Baristo Road.

Some of the buildings on the campus are considered historic and are examples of Desert Modern architecture, a regional style of Modernism that was developed in the Coachella Valley starting in the late 1940s.[32] These include the first PSHS buildings (the 200, 300, and 700 Buildings), the auditorium, cafeteria and dining rooms, the library, and the Farrell Building.

In the early 1950s, PSUSD hired the local architectural firm of Williams, Williams, & Williams to design a new and enlarged campus. Harry Williams, father of E. Stewart and H. Roger Williams, passed away in 1957, and E. Stewart and H. Roger merged with the architects Albert Frey and John Porter Clark after their father's death. E. Stewart Williams and Albert Frey had previously worked together in 1952, on the design for the new city hall and council chamber buildings for the City of Palm Springs.

32 Daly & Associates, *Final HRA Report* (March 2013).

The team of Williams and Frey may have convinced PSUSD to turn towards the future with the design of more modern new buildings to be added to the campus. From 1958 to 1962, the campus took on a more futuristic appearance with the construction of the 1,165-seat auditorium and music building, administration building, a building devoted to science laboratories and classrooms, a library, gymnasium, cafeteria complex, all designed in the Modern style of architecture.[33]

Several of the buildings within the campus have the potential to be considered historically or architecturally significant. These include the first PSHS Buildings (classroom buildings 200, 300, and 700), the auditorium building, cafeteria and dining rooms, library, and the Farrell building. This analysis focuses on the cafeteria and library buildings, which appear to be eligible for listing in CRHR.[34]

The determination for historical significance was analyzed through the State of California Department of Parks and Recreation (DPR) Form, the Palm Springs High School Campus[35] (**Appendix C**), as well as through the review of the City's historic inventory (*2004 Historic Resources Survey*[36] and associated *Citywide Reconnaissance Survey Master List*[37] and the *Class 1 and Class 2 Historic Sites, Historic Districts, and Properties Listed on the National Register of Historic Places*).[38]

The City of Palm Springs has completed inventories of potential historic buildings within the City; as part of this inventory, the City has included buildings on the joint PSHS-DLA campus. The City's inventory identifies in its *2004 Historic Resources Survey* and associated *Citywide Reconnaissance Survey Master List* various buildings on the campus that may be potentially historic, the City does not specifically identify the existing cafeteria and library buildings as significant historical resources within its survey.[39,40] These existing buildings are not identified on the City's list of properties listed on the NRHP.[41]

Historical Significance

In accordance with the California Environmental Quality Act (CEQA), when a building has been listed in the National Register of Historic Places (NRHR) or California Register of Historical Resources (CRHR), or

33 Daly & Associates, *Historic Resources Assessment Memo* (July 2019).
34 Daly & Associates, *Historic Resources Assessment Memo* (July 2019).
35 Daly & Associates, *Final HRA Report* (March 2013).
36 City of Palm Springs, *Historic Resources Survey*.
37 City of Palm Springs, *Citywide Reconnaissance Survey*.
38 City of Palm Springs, Department of Planning Services, Historic Site Preservation Board, "Class 1 and Class 2 Historic Sites, Historic Districts, and Properties Listed on the National Register of Historic Places" (Revised April 11, 2018).
39 City of Palm Springs, *Historic Resources Survey*.
40 City of Palm Springs, *Citywide Reconnaissance Survey*.
41 City of Palm Springs, Department of Planning Services, Historic Site Preservation Board, "Class 1 and Class 2 Historic Sites, Historic Districts, and Properties Listed on the National Register of Historic Places" (Revised April 11, 2018).

determined eligible for listing in those registers by a qualified Architectural Historian or Historic Architect, the impacts of any changes, alterations, or demolition of that historic resource must be evaluated to assess if the project has the potential to cause a substantial adverse change to the property that would cause it to lose its ability to convey its historic significance (15064.5(b).)

The City's General Plan states that sites and buildings of historical significance should be preserved when possible and that new buildings should be designed to complement surrounding structures, climate, and lifestyle with styles, colors, and materials appropriate to the City and surrounding environment.[42] The Historic Resources Assessment Memo (see **Appendix C**) identified that the proposed improvements to the cafeteria and library buildings will not result in a substantial adverse changes that would affect their ability to retain their individual eligibility for listing in the CRHR.

An analysis of the existing library building and the cafeteria complex on the PSHS portion of the joint campus, and how implementation of the proposed Project could affect their eligibility for listing in the California Register of Historical Resources (CRHR) is discussed in the *Historic Resources Assessment Memorandum for the Palm Springs High School Campus* (Historic Resources Assessment Memo), prepared by Pam Daly, located in **Appendix C**.

Proposed Project

The proposed Project includes a series of renovations and seismic upgrades. In order to meet current code requirements, the District is proposing modernization improvements on the PSHS campus that would include various architectural, structural, fire/life/safety and accessibility upgrades. These proposed modernization improvements would be implemented to 3 existing buildings, including the library, gymnasium, and cafeteria. As noted previously, The existing library building and cafeteria complex both are determined eligible for the listing in the CRHR,[43] as discussed in the Historic Resources Assessment Memo (see **Appendix C**). However, the proposed upgrades would not result in a substantial adverse change to the library or cafeteria buildings.

The proposed Project would include the redesign of roof slopes and modification to existing drainage systems, to focus on redirecting storm water away from buildings and doorways. The modifications would include grading the ground immediately adjacent to the exteriors of buildings so that storm water will be

43 Daly & Associates, *Historic Resources Assessment Memo* (July 2019).

directed to new landscaped areas with appropriately-sized catch basins. This approach will enhance the outdoor environment while minimizing water damage to buildings.

The Historic Resources Assessment Memo (refer to **Appendix C**) was prepared to assess the historic considerations of the proposed rehabilitation of the library and cafeteria buildings for adherence to the *Secretary of the Interior's Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring & Reconstructing Historic Building*s (SOIS). The SOIS are used to analyze project impacts for buildings/structures/objects/features and historic landscapes as noted in Section 15064.5 (b) (3) of the *CEQA Guidelines*. Alterations and physical changes to historical properties that meet the guidelines of the SOIS are considered to be mitigated to a level of impact that is "less than significant," and will not demolish or materially alters those physical characteristics of a historic resource that convey its eligibility for listing in the CRHR. The SOIS are divided into four categories for choosing an appropriate treatment to protect historical resources: preservation, restoration, rehabilitation, and reconstruction. Although the library and cafeteria buildings are being preserved in place, various features of each building will be repaired, replaced, or adapted for a new use during the course of implementation of the proposed Project.

The modernized cafeteria building would continue to be used for its current purposes, except for the multipurpose room to the west of the main dining room. The multipurpose room would be adaptively reused as transitional space between the new mini-gym and the food service area. The mini-gym would be constructed on the rear (subordinate) elevation of the cafeteria complex, on what is currently a paved parking lot and courtyard. The historic character and the features and spaces that characterize the cafeteria building would be retained and preserved, even with the addition of the mini-gym. The proposed Project does not include the destruction of any distinctive features, finishes, construction techniques, or examples of craftsmanship associated with the cafeteria building. The Mid-Century Modern architectural characteristics of the cafeteria building would be preserved on its primary (north, east, south) elevations, and only minimal changes will be made, where necessary, so as to improve the seismic stability and use of the building. Implementation of the proposed Project has the potential to result in significant.

The modernization of the library would focus on seismic reinforcement, installing fire sprinklers, acoustical improvements, roof drainage, lighting updates, and preservation of the historic features of the building. The proposed Project would also allow for the rehabilitation of several historic aspects within the interior of the building, including the redesign of the soffit over the circulation desk that had been inappropriately altered from its original design, and re-installing period-appropriate brushed aluminum/steel entrance doors that had been removed at some point in time. Construction of the proposed Project would not alter or change the defining characteristics of the library. No distinctive features, finishes, construction techniques, or examples of craftsmanship association with the library would be destructed as part of the proposed Project. The historic character and the features and spaces that characterize the library building

would be retained and preserved. Implementation of the proposed Project has the potential to result in significant.

Therefore, the proposed Project has been reviewed under the SOIS for the rehabilitation of historic properties as provided in the Historic Resources Assessment Memo. Based on the analysis, the proposed Project is in compliance with the SOIS (Rehabilitation) and will not result in a substantial adverse change to the library or cafeteria buildings. The cafeteria and library buildings would not be materially altered or demolished, and the resources will retain their individual eligibility for listing in the CRHR. Therefore, the proposed Project would have a less than significant impact with regard to the proposed seismic upgrades and modernization improvements for the cafeteria and library buildings.

The library's original, ceiling light fixtures would be re-wired and refitted with LED lights, and this would retain the cohesive geometric design of the building's interior. Sound buffering panels would be installed on the interior walls using a hanging wall system, instead of simply gluing the panels to the walls, to avoid excessive damage to the wall surface if they are removed in the future. The awning over the front entranceway would be repaired with the removal of deteriorated support posts, which would be replaced with in-kind posts.

Mitigation Measures: The following mitigation measures have been identified to reduce impacts to less than significant:

CUL-1 The District shall retain a historic architect throughout Project implementation to ensure the preservation of the historic value of the cafeteria and library buildings does not become compromised during construction improvements. The historic architect shall be available to visit the PSHS campus at a minimum of once a month during the renovation portion of the buildings.

CUL-2 The District shall ensure the retained construction contractor adheres to the following best practices to preserve the historic features of the cafeteria:

- Replace pair of steel-frame doors and surrounding glazing to restore the original horizontal design element of the fenestration in the classroom/physical education space west of the food service area.
- Paint the exterior surface of the cafeteria using common preparation and painting techniques. No destructive chemical or physical treatments such as sandblasting shall be utilized.
- No ground disturbance activities shall be permitted in conjunction with improvements to cafeteria.

CUL-3 The District shall ensure the retained construction contractor adheres to the following best practices to preserve the historic features of the library:

- Restore design elements, such as the front doors and circulation desk soffit, to rehabilitate architectural details of the library.
- Construct a new soffit with horizontal air vents set on the face to reference the design of the original soffit.
- Replace the steel supports of the library's front awning due to age- and weather-related deterioration. The support posts shall be replaced with in-kind materials that match the diameter of the original posts and painted to match the existing posts.
- Doors shall be installed to replicate the brushed aluminum, full-glass insert style doors, as were called for by the architects in the original drawings of the library building.
- Paint the exterior surface of the library using common preparation and painting techniques. No destructive chemical or physical treatments such as sandblasting shall be utilized.
- No ground disturbance activities shall be permitted in conjunction with improvements to cafeteria.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than Significant Impact with Project Mitigation. The proposed Project would include seismic upgrades and modernization improvements to existing buildings on the previously disturbed and developed campus. Minor ground-disturbing activities would occur in areas that are already disturbed, which would include the demolition, site preparation, and construction.

The several archaeological sites are located within the City of Palm Springs and area near the campus; however, the Project site is not designated for having archaeological resources.[44] Furthermore, the Cultural Resources Records Review (see **Appendix C**) indicated that no archaeological resources have been documented on the Project site.

While implementation of the proposed Project does not involve excavation activities for subterranean development, the proposed Project could have potential to unearth undocumented archaeological resources beneath the Project Site. As discussed in **Section 5.18: Tribal Cultural Resources**,

62 Daly & Associates, *Final HRA Report* (March 2013).

implementation of the proposed Project has the potential to result in significant impacts related to the potential to unearth undocumented archaeological and tribal cultural resources.

Impacts would be potentially significant

Mitigation Measures: **Mitigation Measure TCR-1** has been identified to reduce impacts to less than significant.

c. Disturb any human remains, including those interred outside of formal cemeteries

Less than Significant Impact. A significant impact would occur if previously interred human remains would be disturbed during excavation of the Project site. The Project site is located in an urbanized area and has been subject to grading and development in the past. The nearest cemetery is the Forest Lawn Memorial Park, located at 4707 East Sunny Dunes Road, approximately 2 miles southeast of the Project site. While there are no other places of human internment, or burial grounds or sites known to occur within the Project area, there is always a possibility that human remains can be encountered during construction.

If human remains are encountered unexpectedly during demolition, site preparation, and/or construction, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If human remains of Native American origin are discovered during Project construction, compliance with State laws, which fall within the jurisdiction of the Native American Heritage Commission (PRC 5097), relating to the disposition of Native American burials will be adhered to.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

5.6 ENERGY

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact. The proposed Project would consume electricity, natural gas, and transportation energy, during construction and operation. The proposed use of the cafeteria, library, gymnasium buildings would be similar compared to existing conditions. Due to the limited nature of construction activities, the proposed Project is not anticipated to require a substantial increase energy consumption because construction activities would be temporary.

As the buildings would be designed to meet current code requirements, they would comply with applicable provisions of Title 24 and the California Green Building Standards Code (CALGreen) to reduce energy demand.[45] Therefore, the proposed Project would not result in the wasteful, inefficient, and unnecessary consumption of transportation fuel and impacts with respect to energy demand.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Conflict with or obstruct a State or local plan for renewable energy or energy efficiency?

Less than Significant Impact. As stated above, the proposed Project would consume electricity, natural gas, and transportation energy consumption during both construction and operation. As the proposed

45 California Energy Commission, *2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings* (June 2015), accessed July 2019, https://www.energy.ca.gov/2015publications/CEC-400-2015-037/CEC-400-2015-037-CMF.pdf.

Project would modernize the existing cafeteria, library, and gymnasium as new efficient buildings that meet current code requirements, it would not result in a higher consumption of energy when compared to existing conditions. As such, the proposed Project would not conflict with any local or general plan for renewable energy or energy efficiency.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

5.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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. An active earthquake fault or fault trace, or is the site located within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan?	☐	☐	☒	☐
iii. The construction, reconstruction, or relocation of any school building on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building?	☐	☐	☒	☐
iv. Strong seismic ground shaking?	☐	☐	☒	☐
v. The construction, reconstruction, or relocation of any school building on a site subject to moderate-to-high liquefaction?	☐	☐	☒	☐
vi. The construction, reconstruction, or relocation of any school building on a site subject to landslides?	☐	☐	☐	☒
b. Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
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 wastewater	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
disposal systems where sewers are not available for the disposal of wastewater?				
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

Discussion

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.

Less than Significant Impact. The Project site is not located within an Alquist-Priolo Earthquake Fault Rupture Zone, as delineated by the California Geological Survey. Therefore, the California Geological Survey does not list the Project site in an earthquake fault zone and so active or potentially active faults with the potential for surface fault rupture are not known to be located directly beneath or projecting toward the Project site.[46]

The proposed Project would renovate and upgrade buildings that would be required to be implemented in accordance with the current California Building Code (CBC),[47] which contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. Construction of the proposed Project would comply with the Division of the State Architect (DSA) requirements mandated by AB 300 for seismic safety.[48]

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

46 California Department of Conservation, *Map Data Layer Viewer,* accessed July 2019, https://maps.conservation.ca.gov/cgs/DataViewer/.

47 California Building Standards Commission, "California Building Standards Code (California Code of Regulations, Title 24)," accessed July 2019, available at http://www.bsc.ca.gov/codes.aspx.

48 California Education Code, sec. 17317, AB 300, Corbett. Seismic safety: Schools.

ii. An active earthquake fault or fault trace, or is the site located within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan?

Less than Significant Impact. The Project site is located approximately 5.0 miles south of the Garnet Hill Fault, which is the closest active fault to the Project site. The fault is approximately 15 miles in length, in which the fault section north of Palm Springs runs east–west. The fault is considered active as it is designated as Holocene.[49]

The Project site is not designated in a specific safety zone within the safety element of the General Plan. However, because the City is located in an area adjacent to active faults, the City is subject to substantial seismic hazards. All site and building improvements would be required to be implemented in accordance with the current CBC,[50] which contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. The proposed Project would also comply with the DSA requirements mandated by AB 300 for seismic safety.[51]

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

iii. The construction, reconstruction, or relocation of any school building on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building?

Less than Significant Impact. As mentioned before, proposed development would renovate and upgrade existing buildings on the high school campus, including the construction of two new building additions. The Project site is located approximately 5.0 miles south of the Garnet Hill Fault, which is the closest active fault to the Project site. The fault is approximately 15 miles in length, in which the fault section north of Palm Springs runs east–west. The proposed Project would not involve renovations of the buildings along the trace of a fault. As such, surface rupture is not expected to occur within the life of the buildings.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

---

49 City of Palm Springs, *General Plan,* "Safety Element" (2007) accessed July 2019, http://www.palmspringsca.gov/home/showdocument?id=1975.

50 California Building Standards Commission, "California Building Standards Code."

51 California Education Code, sec. 17317, AB 300, Corbett. Seismic safety: Schools.

iv. Strong seismic ground shaking?

Less than Significant Impact. Similar to the rest of Southern California, the Project site is subject to ground shaking and potential damage in the event of earthquakes. As noted previously, the most likely source of strong ground shaking within the region would be a major earthquake along the San Andreas Fault. Because the Project site is in a seismically active area, occasional seismic ground shaking is likely to occur within the lifetime of the proposed Project.

The City lies entirely within Seismic Zone 4 and is potentially subject to the high acceleration, or changes in speed or velocity, due to seismic shaking.[52] The State regulates development in California through a variety of tools that reduce hazards from earthquakes and other geologic hazards. The current CBC contains provisions to safeguard against major structural failures or loss of life caused by earthquakes or other geologic hazards. The proposed Project would be required to adhere to the provisions of the current CBC. Compliance with the requirements of the current CBC for structural safety during a seismic event would reduce hazards from strong seismic ground shaking. The proposed Project would also comply with the DSA requirements mandated by AB 300 for seismic safety.[53]

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

v. The construction, reconstruction, or relocation of any school building on a site subject to moderate-to-high liquefaction?

Less than Significant Impact. Liquefaction refers to loose, saturated sand or gravel deposits that lose their load-supporting capability when subjected to intense shaking.

Similar to much of the land in the City, the Project site is not in an area of liquefaction. According to the seismic hazards map within the City's General Plan, the Project site is designated in an area of low liquefaction susceptibility, because the approximate depth to groundwater is greater than 50 feet.[54] The proposed Project would be required to adhere to the current CBC, which contains provisions for soil preparation to minimize hazards from liquefaction and other seismic-related ground failures.

Impacts would be less than significant.

---

52 City of Palm Springs, *General Plan,* "Safety Element."
53 Division of the State Architect, "Education Code: Section 17317," accessed July 2019, http://www.dgs.ca.gov/dsa/AboutUs/ab300/ab300edcode.aspx.
54 City of Palm Springs, General Plan, Safety Element."

Mitigation Measures: No mitigation measures are required.

vi. The construction, reconstruction, or relocation of any school building on a site subject to landslides?

No Impact. The risks associated with landslides occur when building or structures are placed on slopes. The Project site is not within or near an area susceptible to landslides. Due to previous development, the Project site and surrounding areas are relatively flat and contain minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site. As such, the proposed Project would not be subject to landslides.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

b. Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. Erosion is the movement of rock fragments and soil from one place to another. Precipitation, running water, waves, and wind are all agents of erosion. Significant erosion typically occurs on steep slopes where storm water and high winds can carry topsoil down hillsides.

The Project site is developed within an existing school campus, and no areas of erosion would occur within the confines of the site. The Project site and surrounding areas are urbanized, which are relatively flat and contain minimal rises or changes in elevation. No major slopes or bluffs are on or adjacent to the site. Upon proposed Project completion, the potential for soil erosion or the loss of topsoil would be expected to be extremely low.

Because the Project site is greater than 1 acre in size, the proposed Project would require a Stormwater Pollution Prevention Plan (SWPPP).[55] Project construction would require minimal earthmoving activities. Therefore, the proposed Project would implement best management practices (BMPs) designed to prevent erosion and siltation during the proposed Project's construction phase, such as use of nontoxic soil stabilizers, covering stockpiles of dirt or other loose granular construction materials, and containing soil runoff from disturbed areas by means of berms, vegetated filters, fencing, or catch basins.

Furthermore, implementation of the proposed Project would not result in a substantial change in the number of impervious surfaces and, for this reason, the quantity of runoff from the Project site in conjunction with the rest of the campus would not change substantially. Various hardscaping and

55 U.S. Environmental Protection Agency (EPA), *Stormwater Pollution Prevention Plan (SWPPP)*, accessed July 2019, https://www.epa.gov/npdes.

landscaping improvements would be implemented as part of the proposed Project to redirect stormwater away from buildings and doorways on the Project site. An improved two-fold drainage system would channel stormwater in the new landscaped areas and other catch basins throughout the Project site, which would then be routed to the detention basin at the southeast corner of the Project site where it can percolate back into the water table. As such, the proposed Project would ultimately improve existing drainage conditions on the Project site.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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?

Less than Significant Impact. Proposed development would renovate and modernize existing buildings located on the campus. The Project site is located on flat developed land that is not prone to landslides. The City also has a low possibility of being affected by liquefaction and lateral spreading.[56] This hazard is considered low because the soils in consist of silt and clay contents of less than 30 percent and the approximate depth to groundwater for the entire area is greater than 50 feet.[57] Research and historical data indicate that loose granular materials saturated with groundwater and located at depths of less than 50 feet with silt and clay contents of less than 30 percent are most susceptible to instability.[58] As such, the existing buildings are not located on a geological unit or soil that is unstable. The renovations would not result in substantial hazards from unstable or expansive soils. As such, the proposed Project would be required to adhere to the current CBC, which contains provisions for soil preparation to minimize hazards from liquefaction and other seismic-related ground failures. Implementation of the proposed Project would also comply with the DSA requirements mandated by AB 300 for seismic safety.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

56 City of Palm Springs, *General Plan,* "Safety Element."
57 City of Palm Springs, *General Plan,* "Safety Element."
58 City of Palm Springs, *General Plan,* "Safety Element."

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?

Less than Significant Impact. The Project site consists of a fully developed school campus. Expansive soils contain significant amounts of clay particles that have the ability to give up water (shrink) or take on water (swell). When these soils swell, the change in volume can exert pressures that are placed on them, and structural distress and damage to buildings could occur. Given the relatively minor amount of clay present in soils in the City, expansive soils are not considered a significant hazard for the proposed Project.[59]

The proposed Project would also be required to adhere to the current CBC, which contains provisions for soil preparation to minimize hazards from liquefaction and other seismic-related ground failures. Renovation of the buildings and construction of the new additions would also comply with the DSA requirements.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. Development of the proposed Project would not require the installation of a septic tank or alternative wastewater disposal system.

The existing buildings on the PSHS campus are connected to existing sewers main lines and service lines, which are currently available in the surrounding roadways. The proposed Project would not be constructed on soils incapable of adequately supporting the use of septic tanks surrounding the area.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

No Impact. The proposed Project would include seismic upgrades and modernization improvements to buildings on the PSHS campus. The Project site was previously disturbed during construction of the

59 City of Palm Springs, *General Plan,* "Safety Element."

campus. Minor ground-disturbing activities would occur in areas that are already disturbed, which would include the demolition, site preparation, and construction activities.

The several paleontological sites are known to exist in the surrounding area; however, the Project area is not known for its paleontological resources.[60] Given that very little ground-disturbing activity is proposed to occur, the possibility of uncovering or disturbing a paleontological resource is considered highly unlikely.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

60 City of Palm Springs, *General Plan,* "Safety Element."

5.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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?	☐	☐	☒	☐

Discussion

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

Less than Significant Impact. Greenhouse gas (GHG) emissions refer to a group of emissions that are believed to affect global climate conditions. These gases trap heat in the atmosphere, and the major concern is that increases in GHG emissions are causing global climate change. Global climate change is a change in the average weather on earth that can be measured by wind patterns, storms, precipitation, and temperature.

There are no federal, State, or local adopted thresholds of significance for addressing an institutional project's GHG emissions. The California Air Pollution Control Officers Association suggests making significance determinations on a case-by-case basis when no significance thresholds have been formally adopted by a lead agency. Assessing the significance of a project's contribution to cumulative global climate change involves: (1) evaluating the project's sources of GHG emissions; and (2) considering project consistency with applicable emission reduction strategies and goals, such as those set forth by the lead agency or other regional or State agency.

The proposed Project would result in short-term emissions of GHGs during construction. Site- or Project-specific data were used in the CalEEMod model where available. Although GHGs are generated during construction and are accordingly considered one-time emissions, it is important to include construction-related GHG emissions when assessing all of the long-term GHG emissions associated with a project. Current practice is to annualize construction-related GHG emissions over a project's lifetime in order to include these emissions as part of a project's annualized lifetime total emissions so that GHG reduction measures will address construction GHG emissions as part of the operational GHG reduction strategies. A project lifetime has generally been defined as 30 years; therefore, the proposed Project's estimated

construction GHG emissions have been annualized over a 30-year period and are included in the annualized operational GHG emissions.

Area source emissions would be generated by the consumption of natural gas for space and water heating devices. The proposed Project would also result in GHG emissions due to area source emissions from natural gas, electricity demand, water consumption, and solid waste generation. The annual net GHG emissions associated with the construction and operation of the proposed Project are provided in **Table 5.8-1: Estimated Construction and Operational Greenhouse Gas Emissions**. GHG emissions from implementation (construction and operation) of the proposed Project were quantified and evaluated in consideration of this threshold using the tiered approach promulgated by the SCAQMD Working Group. The Tier 3 screening threshold of 3,000 MTCO2e per year for an individual nonindustrial project was selected as the metric for GHG emissions analysis. As shown in **Table 5.8-1**, the renovations and improvements would result in 77 $MTCO_2e$ annually. The proposed Project's GHG emissions would be lower than the SCAQMD screening threshold for individual projects of 3,000 MTCO2e per year, suggesting that under the tiered analysis approach, no further assessment is warranted.

Table 5.8-1
Estimated Construction and Operational Greenhouse Gas Emissions

GHG Emissions Source	Emissions (MTCO2e/Year)
Construction	4
Area sources	<1
Energy	43
Mobile	0
Waste	22
Water	6
Annual total	**77**

*Note: Refer to **Appendix B.1: Existing Annual**, 2.1: Overall Construction and 2.2: Overall Operation.*

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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

Less than Significant Impact. AB 32, the California Global Warming Solutions Act of 2006, focuses on reducing GHG emissions in California.[61] GHGs, as defined under AB 32, include carbon dioxide (CO_2), methane, nitrous oxide, hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride. AB 32 requires that GHGs emitted in California be reduced to 1990 levels by the year 2020. In November 2017, CARB adopted an updated Climate Change Scoping Plan, which details strategies to meet that goal. The Climate Change Scoping Plan[62] also recommends energy-efficiency measures in buildings such as maximizing the use of energy efficient appliances and solar water heating, as well as complying with green building standards that result in decreased energy consumption compared to Title 24 building codes.[63] In addition, the Climate Change Scoping Plan encourages the use of solar photovoltaic panels and other renewable sources of energy to provide clean energy and reduce fossil fuel–based energy.

The proposed Project would be designed in accordance with the 2016 Title 24 Energy Efficiency Standards, which represent an approximate improvement of 30 percent beyond the 2008 Standards that were used in assumptions for the City's 2013 CAP GHG analysis. Conformance with the 2016 Standards is consistent with the City's objectives to reduce GHG emissions to meet regional and Statewide emission reduction targets. Therefore, the proposed Project does not interfere with the State's implementation of (i) Executive Order B-30-15 and Senate Bill 32's target of reducing Statewide GHG emissions to 40 percent below 1990 levels by 2030 or (ii) Executive Order S-3-05's target of reducing Statewide GHG emissions to 80 percent below 1990 levels by 2050 because it does not interfere with the State's implementation of GHG reduction plans described in the CARB's updated Scoping Plan.

The proposed Project is considered consistent with the above goals, and not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

61 California Air Resources Board (CARB), "Assembly Bill 32 Overview" (last reviewed August 4, 2014), accessed January 2019, http://www.arb.ca.gov/cc/ab32/ab32.htm.

62 CARB, "AB 32 Scoping Plan" (last reviewed January 8, 2019), accessed January 2019, http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm.

63 California Building Standards Commission, "California Building Standards Code."

5.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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. Does the proposed school site contain one or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood?	☐	☐	☐	☒
d. Is the proposed school site located near an aboveground water or fuel storage tank or within 1,500 feet of an easement of an aboveground or underground pipeline that can pose a safety hazard to the site?	☐	☐	☐	☒
e. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
f. Create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste?	☐	☐	☒	☐
g. Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site? *(Does not apply to school sites approved by CDE prior to January 1, 1997.)*	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
h. Is the property line of the proposed school less than the following distances from the edge of respective power line easements: (1) 100 feet of a 50–133 kV line; (2) 150 feet of a 220–230 kV line; or (3) 350 feet of a 500–550 kV line?	☐	☐	☐	☒
i. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☒	☐
j. Does the Project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?	☐	☐	☒	☐
k. Is the Project site a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code?	☐	☐	☒	☐
l. If prepared, has the risk assessment been performed with a focus on children's health posed by a hazardous materials release or threatened release, or the presence of naturally occurring hazardous materials on the school site?	☐	☐	☒	☐
m. If a response action is necessary and proposed as part of this project, has it been developed to be protective of children's health, with an ample margin of safety?	☐	☐	☒	☐
n. Is the proposed school site situated within 2,000 feet of a significant disposal of hazardous waste?	☐	☐	☒	☐
o. Is the proposed school site within two miles, measured by air line, of that point on an airport runway or potential runway included in an airport master plan that is nearest to the site? *(Does not apply to school sites acquired prior to January 1, 1966.)*	☐	☐	☐	☒
p. For a project located within an airport land use plan or, where such plan has not been adopted, within 2 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?	☐	☐	☐	☒

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
q. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☐	☒
r. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Discussion

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less than Significant Impact.

Project Construction

Construction activities may involve the use of hazardous materials, which may include fuels, lubricants, coatings, and grease related to construction equipment and activities. However, hazardous materials would be used in accordance with regulatory standards and protocols and would not be used in such quantities or stored in such a manner as to pose significant safety hazards. These activities would also be short term or one time in nature and would cease upon proposed Project completion.

The use, transport, storage, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations. Compliance with applicable laws and regulations governing hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner, which would minimize the potential for safety impacts to occur. For example, all spills or leakage of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable State and local regulations regarding the cleanup and disposal of the contaminant released.

All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Strict adherence to all emergency response plan requirements sets forth by the City of Palm Springs, Riverside County Department of Environmental Health (RCDEH), and Palm Springs Fire Department (PSFD) would be required through the duration of the proposed Project construction.

Impacts would be less than significant.

Project Operation

On-site uses during the operation of cafeteria, library, and gymnasium buildings may involve the use of small amounts of cleaning products and related materials that may be categorized as hazardous. These materials would be stored on the Project site in small quantities. The use, storage, transport, and disposal of hazardous materials by maintenance staff would be required to comply with existing regulations of several agencies, including the Department of Toxic Substances Control (DTSC), US Environmental Protection Agency (USEPA), Occupational Safety and Health Administration (OSHA), California Department of Transportation (Caltrans), RCDEH, and PSFD.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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?

Less than Significant Impact. On January 8, 2019, Environmental Data Resources Inc. conducted a search of available environmental records and prepared a Radius Map Report (EDR Report), attached as **Appendix D: EDR Report**.

Project Construction

According to the EDR Report, the PSHS campus was identified on multiple databases. Construction activities on the Project site would involve the temporary use of potentially hazardous materials, including vehicle fuels, paints, oils, and transmission fluids. However, all potentially hazardous materials would be used and stored in compliance with applicable federal, State, and local regulations. Additionally, the PSFD would have the authority to perform inspections and enforce federal and State laws governing the storage, use, transport, and disposal of hazardous materials and wastes.

The proposed Project includes seismic upgrades and modernization improvements. This existing buildings on the Project site were constructed between 1948-1961, prior to the bans on the use of asbestos-containing materials (ACMs) and lead-based paints (LBPs) in the late 1970s. Based on the age of the existing buildings on the PSHS campus, the presence of ACMs or LBPs may occur on the Project site. However, any ACMs or LBPs found would be properly removed and abated as required by State law, specifically Title 22 of the CCR, the California Health and Safety Code, including the Hazardous Waste Control Law. The District would also be required to comply with SCAQMD's Rule 1403 regarding the handling and disposal of ACMs on the Project site.

Hazardous material impacts typically occur in a local or site-specific context. Although other foreseeable developments within the area would likely increase the potential to disturb existing contamination, the handling of hazardous materials would be required to adhere to applicable federal, State, and local requirements that regulate work and public safety. Therefore, impacts of the proposed Project would not have the potential to create a significant hazard to the public or environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts would be less than significant.

Project Operation

The renovated buildings would operate similar to the existing buildings on the Project site. Operation on the Project site would not create a hazard through upset or accident conditions involving hazardous materials. The types and amounts of hazardous materials that would be used in connection with the proposed Project would be typical of those used on school campuses (e.g., cleaning solutions, solvents, landscaping pesticides, painting supplies, and petroleum products).

All materials and substances would be subject to applicable health and safety requirements. This would include affixing appropriate warning signs and labels; installing emergency wash areas; providing well-ventilated areas and special plumbing; and maintaining adult supervision. Compliance with existing regulations would result in no reasonably foreseeable upset or accident conditions that would create a significant hazard to the public due to the release of hazardous materials during construction.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Does the school site contain one or more pipelines, situated underground or above ground, which carry hazardous substances, acutely hazardous, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood?

No Impact. The Project site is currently developed and located on a fully developed high school campus. Surrounding uses around the Project site include school, residential, commercial, and recreation space. No known underground or aboveground pipelines exist that carry hazardous substances or hazardous wastes to the Project site.[64]

64 US Department of Transportation, Pipeline and Hazardous Materials Safety Administration, *National Pipeline Mapping System, Public Viewer*, accessed July 2019, https://pvnpms.phmsa.dot.gov/PublicViewer/.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

d. Is the proposed school site located near an above ground water or fuel storage tank or within 1,500 feet of an easement of an above ground or underground pipeline that can pose a safety hazard to the site?

No Impact. The Project site is currently developed and located on a fully developed high school campus. Surrounding uses around the Project site consist of residential, commercial, and recreation space. No known underground or aboveground pipelines exist within 1,500 feet that pose a safety hazard to the Project site.[65]

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

e. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less than Significant Impact. Construction activities of the proposed Project may involve the use of hazardous materials. Such materials may include fuels, lubricants, coatings, and grease related to construction equipment and activities. However, the materials used would not be in such quantities or stored in such a manner as to pose a significant safety hazard. These activities would also be short term or one time in nature and would cease upon Project completion.

The use, transport, storage, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations. Compliance with applicable laws and regulations governing hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner, thereby minimizing the potential for safety impacts to occur. For example, all spills or leakages of petroleum products during construction activities are required to be immediately contained, the hazardous material identified, and the material remediated in compliance with applicable State and local regulations regarding the cleanup and disposal of the contaminant released. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Strict adherence to all emergency response plan requirements sets

65 US Department of Transportation, *National Pipeline Mapping System, Public Viewer*.

forth by the City of Palm Springs, the PSFD, and DTSC would be required through the duration of the Project construction.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

f. Create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and nonpermitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste?

Less than Significant Impact.

(a) Permitted and Nonpermitted Facilities Identified by the Jurisdictional Air Quality Control Board or Air Pollution Control District

A proposed Project would expose sensitive receptors to elevated pollutant concentrations if it were to place the school in an area with pollutant concentrations above ambient concentration in the SCAQMD area. Recent air pollution studies have shown an association between proximity to major air pollution sources and a variety of health effects, which are attributed to a high concentration of air pollutants. The Facility Information Detail (FIND) database shows all the permitted facilities within the SCAQMD boundary.[66] As shown in the EDR Report, the PSHS campus shows up twice on the FIND database. In addition, the EDR Report found one additional off-site facility, located at 1750 E Arena #2, approximately 0.23 miles to the northwest of the Project site that shows up on the FIND database.

The Project site has not been identified by this database or an air quality control board. As shown above in **Section 5.3: Air Quality**, regional construction and operation emissions would be less than significant. In addition, the proposed Project is not classified as a project type listed to expose sensitive receptors to substantial pollutant concentrations. The proposed Project is not anticipated to use hazardous materials in appreciable quantities. Hazardous substances currently are regulated under the California Accidental Release Prevention (CalARP) Program.[67] The CalARP Program satisfies the requirements of the Federal

66 SCAQMD, "Facility Information Detail (F.I.N.D.)," accessed January 2019, https://www.aqmd.gov/nav/FIND/facility-information-detail.

67 California Governor's Office of Emergency Services, "California Accidental Release Prevention Program FAQ" (February 2014,) accessed July 2019, http://www.caloes.ca.gov/FireRescueSite/Documents/CalARP%20FAQ%20-%20Feb2014.pdf.

Risk Management Plan Program and contains additional State requirements. The CalARP Program applies to regulated substances in excess of specific quantity thresholds. The majority of the substances have thresholds in the range of 100 to 10,000 pounds. The uses associated with the proposed Project may contain small, if any, amounts of these hazardous substances typical with classroom and other school facility spaces. However, typical use of these products would not result in quantities at any one location that exceed the thresholds. Therefore, hazardous air emissions generated from mobile and stationary sources within a quarter-mile radius of the site are not anticipated to pose an actual or potential endangerment to students or staff at a school facility.

Impacts would be less than significant.

(b) Freeways and Other Busy Traffic Corridors

No freeways are located within one-quarter mile of the Project site. EDC Section 17213 states that a busy traffic corridor is defined as having 50,000 or more average daily trips (ADT) in a rural area or 100,000 or more ADT in an urban area.[68]

Currently, the City has compiled traffic data for 2017. The closest main streets to the Project site would be Ramon Road, a major east–west street near the Project site that bounds the southern border of the campus. This roadway segment would contain the highest roadway ADT in the Project site vicinity but has fewer than 50,000 ADT,[69] and the proposed Project would not generate any increase of daily vehicle trips, as analyzed in **Section 5.17: Transportation**. Therefore, the other surrounding roadway segments have fewer than 50,000 or more ADT in a rural area, or 100,000 or more ADT in an urban area.

Impacts would be less than significant.

(c) Large Agricultural Operations

No large agricultural operations are within a quarter-mile of the Project site because surrounding land uses include school, residential, commercial, and recreation uses.

No impacts would occur.

---

68 California Education Code (EDC), sec. 17213, accessed July 2019, https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=EDC&sectionNum=17213.

69 City of Palm Springs, "Traffic Data," accessed July 2019, http://www.palmspringsca.gov/government/departments/public-works-engineering/traffic-management-center/traffic-data.

(d) A Rail Yard, Which Might Reasonably be Anticipated to Emit Hazardous Air Emissions, or Handle Hazardous or Acutely Hazardous Material, Substances, or Waste

There are no rail yards within one-quarter mile of the Project site.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

g. Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site?

No Impact. As stated before, the City's General Plan designates the Project site as School Uses. The City's Zoning Map designates the Project site as Open Space.[70] The Project site is not designated or zoned for agricultural use, used for agriculture, or subject to a Williamson Act contract (see **Section 5.2: Agricultural and Forestry Resources**). There are no designated agricultural land uses or zoning adjacent or proximate to the Project site.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

h. Is the property line of the proposed school less than the following distances from the edge of respective power line easements: (1) 100 feet of a 50–133 kV line; (2) 150 feet of a 220–230 kV line; or (3) 350 feet of a 500–550 kV line?

No Impact. The Project site is not within the prescribed distances of a 50 to 133 kilovolt (kV) line, a 220 to 230 kV line, or a 500 to 550 kV line.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

70 City of Palm Springs, *General Plan,* "Land Use Element" (1996), accessed January 2019, http://www.palmspringsca.gov/home/showdocument?id=1969.

i. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Less than Significant Impact. The following databases of hazardous materials sites were searched for listings of hazardous materials on the Project site as part of the EDR Report: GeoTracker (State Water Resources Control Board [SWRCB]), EnviroStor (DTSC), and EnviroMapper (USEPA). A review of these databases found that the PSHS campus was included on a list of hazardous materials pursuant to Government Code 65962.5, which is the Hazardous Waste and Substances (Cortese) List, as shown in **Appendix D**.

Although the PSHS campus is listed several times on various databases, the buildings proposed for upgrades and renovations on the Project site are not included. Prior to the issuance of a building permit, a condition of approval for the Project site would construction, demolition, or grading permits, and would be subject to review and/or approval by regulatory oversight agencies. These agencies could also require additional site investigation to more fully delineate the extent of contaminants of concern at the site. If extensive on-site excavation and/or soil off-haul is determined to be the appropriate response action for a site, additional CEQA review may be required to evaluate potential impacts for the response related to air quality, noise, and traffic.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

j. Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?

Less than Significant Impact. Under EDC Section 17213(a)(1), the proposed Project is prohibited from acquiring any current or former hazardous waste disposal site or solid waste disposal site unless the site is a former solid waste disposal site and the wastes have been removed. The EDR Report compiled comprehensive lists of contaminated sites, including the DTSC EnviroStor and SWRCB GeoTracker databases, to determine whether the proposed site is a current or former hazardous waste disposal site or solid waste disposal site. Based on a review of the EDR Report, no current or former hazardous waste disposal sites exist on the Project site.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

k. Is the project site a hazardous substance release site identified by the State Department of Health Services in a current list adopted pursuant to Section 25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code?

Less than Significant Impact. Where a proposed school site is listed by DTSC under Health and Safety Code (HSC) Section 25356, the Project would, through the CEQA processes and under DTSC's oversight, undertake all required removal and/or remedial actions; ensure that DTSC removes the site from this listing; determine that the site as remediated poses no significant health risk to students, faculty, and staff; and secure DTSC's certification that all school buildings may be occupied and used for their intended purpose. The public would then have the opportunity to review the site-specific investigations through the public review process. Compliance with the process and steps outlined would ensure that impacts from any site used for a school project that DTSC formerly listed under HSC Section 25356 would not be a hazard to people on or near the site.

Asbestos-Containing Materials

As previously discussed, based on the age of the existing buildings, there is high potential for ACMs. Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves relocation of underground utilities, could release friable asbestos fibers unless proper precautions are taken.

The federal Clean Air Act regulates asbestos as a hazardous air pollutant, which subjects it to regulation by the SCAQMD under its Rule 1403. Cal/OSHA also regulates asbestos as a potential worker safety hazard. As noted in the regulatory framework, the Asbestos-Containing Materials in Schools rule (40 CFR, Part 763, Subpart E),[71] promulgated under the federal Asbestos Hazard Emergency Response Act (AHERA), requires local education agencies to inspect their school buildings for asbestos-containing construction materials (ACCMs), prepare asbestos management plans, and perform asbestos response actions to prevent or reduce asbestos hazards. AHERA also tasked USEPA with developing a model plan for states for accrediting persons conducting asbestos inspection and corrective-action activities at schools.

The following specific procedures in place for handling ACMs, which the proposed Project will abide by as and when needed:

- Asbestos is to be handled only by qualified and certified contractors. Asbestos contractors/ subcontractors must be approved in accordance with applicable federal, State, and local regulations

71 Code of Federal Regulations, ch. 40, pt. 763—Asbestos, accessed January 2019, available at https://www.epa.gov/sites/production/files/documents/2003pt763_0.pdf.

and must be approved by the District to perform abatement and disposal of ACMs and ACCMs, as defined.

- It is the contractor's responsibility to review the Asbestos Assessment Report (Phase 1) and the Abatement Design (Phase 2) prepared for a site prior to the commencement of work, and to take the necessary steps to ensure the safety of students, faculty, contractor employees, and the public through compliance with regulatory and District-specific requirements.
- Contractors must verify the presence or absence of asbestos content in building materials prior to impacting these materials during construction remodeling or demolition work.
- Upon discovery of any ACMs or ACCMs or presumed asbestos-containing materials (PACMs) not identified in the Phase 1 report, the contractor will stop work in such areas and notify the District's Inspector. The material will be inspected and tested, if necessary, by the District's assigned environmental consultant.
- The contractor shall ensure employees are trained in asbestos awareness to identify ACMs, ACCMs, and PACMs. Training will be in compliance with the requirements of the District's standards. Proof of such training is required to be submitted to a District-authorized representative prior to commencement of work.
- All asbestos abatement and removal work must follow all regulations of the USEPA and/or applicable State agency, Cal/OSHA, and the SCAQMD.
- Personnel working in areas with ACMs or PACMs must have appropriate asbestos training, which may include minor abatement and compliance with negative exposure assessment protocols.

Lead

Lead is a naturally occurring element that can be found in various building materials and projects, such as paint (LBP), water pipes, and solder in plumbing systems. Because of its toxic properties, lead is regulated as a hazardous material. Lead is also regulated as a TAC. Any activity that involves cutting, grinding, or drilling during building renovation or demolition, or that involves relocation of underground utilities, could release lead dust or particles unless proper precautions are taken. Therefore, State-certified materials must be in compliance with applicable health and safety and hazardous materials regulations.

As with asbestos, all projects at existing school and office sites must be reviewed by the Asbestos Technical Unit (ATU) for impact to LBPs prior to the Project's being started. All coated surfaces (paint, varnish, or glazed) are assumed to contain lead, and work that impacts coated surfaces must be performed by properly trained individuals.

Specific handling procedures for handling building materials that may contain lead are the following, with which the ATU will ensure compliance as and when needed:

- Lead abatement, as defined, is to be performed by contractors or subcontractors whose workers are certified by the California Department of Public Health. Lead-related construction work may be performed by contractors' or subcontractors' workers who have been trained in lead awareness. Evidence of certification and/or training is required to be provided to the District's environmental representative prior to the commencement of work.
- It is the contractor's responsibility to review the assessment report addressing the impact to lead-based materials, lead-containing materials or coatings, and materials assumed to contain lead prior to commencement of work, and to take the necessary steps to ensure the safety of students, faculty, contractor employees, and the general public.
- Contractor must identify any LBP or coatings and assumed lead-containing coatings in or on the materials to be impacted within the proposed scope of work prior to any construction, remodeling, maintenance, repair, or demolition activities.
- No lead abatement will proceed until the District's environment representative has given written approval of the lead abatement contractor's written abatement work plan.
- No work by contractors other than the lead abatement contractor will be permitted to work in regulated areas until clearance is provided by the District's environmental representative.
- The lead abatement contractor or general contractor performing monitoring of lead-related construction work will be responsible for characterizing the waste stream (e.g., paint chips, components) and disposing of waste according to the characterization. Hazardous waste will be transported under a Uniform Hazardous Waste Manifest in accordance with District Standard Specification Section 13282.

Polychlorinated biphenyls

Caulking containing polychlorinated biphenyls (PCBs), used around windows, door frames, building joints, and masonry building materials, may be found in schools and other buildings built or renovated between 1950 and 1979. In addition, PCBs have been used in paints, mastics and other adhesives, and fireproofing materials, as well as in the manufacture of some ceiling tiles. Therefore, PCBs would need to be remediated before construction of the proposed Project.

The proposed Project would comply with federal and State regulations and the City guidelines and procedures outlined above for lead, asbestos, and PCBs removal and remediation. With regulatory compliance noted above for abatement and removal of ACMs, LBPs, and PCBs, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

l. If prepared, has the risk assessment been performed with a focus on children's health posed by a hazardous materials release or threatened release, or the presence of naturally occurring hazardous materials on the school site?

Less than Significant Impact. Land uses surrounding the Project site consist of school, residential, commercial, and recreational uses. Other nearby sensitive receptors include parks to the south and west; churches to the west, southwest, and east; daycare centers to the north and east; and a senior living center to the north. The closest of these—the residences to the north and east and a daycare facility to the southeast—are more than 50 feet away from the Project site boundary.

Because these sensitive receptors could house or contain children for periods of the day, impacts from construction activities could have an impact on children's health. However, as shown in **Section 5.3: Air Quality**, the proposed Project would not have impact on human health. Given that the proposed Project primarily involves renovation and upgrade improvements, no major construction activities would occur that would have the potential to release hazardous materials on the Project site. Thus, the preparation of a HRA was not warranted. As previously discussed in **Section 5.3,** construction activities that could generate increased air emissions, such as demolition and building construction, students would be in the classrooms for the majority of school hours. Classroom doors and windows would be closed at all times and any form of pollutants would not enter into the classrooms.

Prior to the issuance of a building permit, the proposed Project must comply with the standards put forth by the DTSC or other responsible regulatory agencies. These agencies could also require additional site investigation to more fully delineate the extent of contaminants of concern at the site. If extensive on-site excavation and/or soil off-haul is determined to be the appropriate response action for a site, additional CEQA review may be required to evaluate potential impacts for the response related to air quality, noise, and traffic.

With regulatory compliance, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

m. If a response action is necessary and proposed as part of this project, has it been developed to be protective of children's health, with an ample margin of safety?

Less than Significant Impact. Land uses surrounding the Project site consist of commercial and office space to the north; commercial and office space to the east; single-family residential units to the south; and recreation and commercial space to the west. Other nearby sensitive receptors include parks to the south

and west; churches to the west, southwest, and east; daycare centers to the north and east; and a senior living center to the north. The nearest sensitive receptor is a classroom located more than 50 feet away from the Project site boundary.

Because these sensitive receptors could house or contain children for periods of the day, impacts from construction activities could have an impact on children's health. As shown in **Section 5.3: Air Quality**, the proposed Project would not have impact on human health. In addition, prior to the issuance of a building permit, the proposed Project must comply with the standards put forth by the DTSC or other responsible regulatory agencies. These agencies could also require additional site investigation to more fully delineate the extent of contaminants of concern at the site. If extensive on-site excavation and/or soil off-haul is determined to be the appropriate response action for a site, additional CEQA review may be required to evaluate potential impacts for the response related to air quality, noise and traffic.

With regulatory compliance, impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

n. Is the proposed school site situated within 2,000 feet of a significant disposal of hazardous waste?

Less than Significant Impact. The EDR Report noted four additional mapped sites on a Cortese-related database or other related database within 2,000 feet of the campus, as shown in **Appendix D.** According to the EDR-provided review of the California Department of Resources Recycling and Recovery Solid Waste Information system, one active landfill was identified within 0.4 miles of the property and, therefore, is farther than 2,000 feet from the Project site. Based on the distance and available information, it is unlikely this site has adversely affected the environmental condition of the Project site. Furthermore, the proposed Project would comply with the standards set forth by DTSC. It is unlikely this site has adversely affected the environmental condition of the Project site.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

o. Is the proposed school site within two miles, measured by air line, of that point on an airport runway or potential runway included in an airport master plan that is nearest to the site?

No Impact. The Project site is located approximately 0.7 miles southwest of the Palm Springs International Airport. The proposed Project would be implemented within the existing campus and would not encroach

into any potential runway. The EDC identifies requirements for schools located near airports, but these requirements do not apply to sites acquired prior to January 1, 1966, nor to any additions or extensions to those sites.[72]

The City's Airport Master Plan notes extended compatibility zones within the vicinity of the Palm Springs International Airport.[73] As shown, the Project site falls outside of the Zone E, Other Airport Envisions, which is used for future airport land use plans.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

p. For a project located within an airport land use plan or, where such plan has not been adopted, within 2 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?

No Impact. The Project site is located approximately 0.7 miles southwest of the Palm Springs International Airport. The proposed Project would be implemented on the existing campus and would not encroach into any potential runway. The CEC identifies requirements for schools located near airports, which do not apply to sites acquired prior to January 1, 1966, nor to any additions or extensions to those sites.[74]

The City's Airport Master Plan notes extended computability zones within the vicinity of the Palm Springs International Airport.[75] As shown, the Project site falls outside of the Zone E, Other Airport Envisions, which is used for future airport land use plans.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

72 EDC, sec. 17215(a) and 17215(b).
73 City of Palm Springs, *Airport Master Plan* (approved October 2015), accessed July 2019, available at http://www.palmspringsca.gov/government/departments/planning/specific-plans/airport-master-plan.
74 EDC, Sections 17215(a) and 17215(b).
75 City of Palm Springs, *Airport Master Plan.*

q. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. Project development would not impair implementation of or physically interfere with the Local Hazard Mitigation Plan.[76] The purpose of the plan is to identify the local hazards, review and assess past disaster occurrences, estimate the probability of future occurrences and set goals to mitigate potential risks to reduce or eliminate long-term risk to people and property from natural and man-made hazards.

During construction and subsequent operation, the proposed Project would not interfere with any of the daily operations of the City's Emergency Plans or the PSFD. All construction activities, including staging, would occur on the campus and would be required to be performed per the District's, City's, and PSFD's standards and regulations. The proposed Project would provide the necessary on- and off-site access and circulation for emergency vehicles and services during the construction and operation phases.

The proposed Project would be required to incorporate all applicable design and safety standards and regulations as set forth by PSFD and the current CBC to ensure that they do not interfere with the provision of local emergency services (provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.). Project development would not require road closures or otherwise impact the functionality of the surrounding roads as public safety access routes. The proposed Project would not introduce any roadways or infrastructure that would bisect or transect surrounding uses.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

r. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

Less than Significant Impact. Within the Palm Springs city limits—specifically, the western and southwestern portions of the City—the neighborhoods located along the foothills and canyon mouths, are generally the most susceptible to wildland fire.[77] Also susceptible to wildland fire are those areas with more vegetation, such as the lower canyon reaches draining the San Jacinto Mountains, located

76 City of Palm Springs, *Local Hazard Mitigation Plan* (August 2012), accessed July 2019, http://www.palmspringsca.gov/home/showdocument?id=34811.

77 City of Palm Springs, *General Plan,* Safety Element (2007).

approximately 10 miles west of the Project site. Canyons within the San Jacinto Mountains include Tachevah Canyon, Tahquitz Creek, Andreas Canyon, and Palm Canyon.[78]

The Project site is not in a fire hazard zone as designated by the California Department of Forestry and Fire Protection.[79] The Project site is in an urbanized area of the City and is not adjacent to or near wildlands that could be subject to wildland fires. No significant risk of injury, loss, or death involving wildland fires would occur as a result of the proposed Project.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

78 City of Palm Springs, *General Plan,* Safety Element (2007).

79 California Department of Fire and Forestry Protection, "California Fire Hazard Zone Map Update Project," accessed July 2019, available at: http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_maps.

5.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater 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 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 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. Is the Project site subject to flooding or dam inundation?	☐	☐	☒	☐
e. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☐	☒
f. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Discussion

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?

Less than Significant Impact.

Construction Phase

During construction, the proposed Project could result in short-term adverse impacts to surface water quality. Construction activities within the site would involve the disturbance of on-site soils for building pad preparation and the hardscape and landscaping improvements, thereby increasing the potential for erosion and off-site transport of sediment in stormwater runoff.

The use of heavy equipment, machinery, and other materials during construction could result in adverse water quality impacts if spills were to encounter stormwater and polluted runoff were to enter downstream receiving waters. Peak stormwater runoff could result in short-term sheet erosion within areas of exposed or stockpiled soils. Additionally, the compaction of soils by heavy equipment may reduce the infiltration capacity of soils and increase runoff and erosion potential.

Discharges from construction sites that could affect storm water, including soil and sediment entering storm water or carried off site by wind, would be regulated by the Statewide General Construction Permit issued by the SWRCB.[80] Given that the size of the Project site is approximately 43 acres, the proposed Project would be required to obtain a SWPPP from the Colorado River Basin Regional Water Quality Control Board (CRBRWQCB), which is in compliance with the National Pollution Discharge Elimination System (NPDES).[81] The SWPPP specifies BMPs with the aim of reducing or eliminating soil erosion and siltation from construction sites. However, it should be noted that ground disturbing activities would only be limited to areas immediately surrounding the 3 buildings proposed for upgrades and renovations, as well as for the center of the PSHS campus where the proposed drainage improvements would occur.

Nevertheless, the proposed Project would implement BMPs designed to prevent erosion and siltation during the Project's construction phase. Examples of BMPs include gravel bag berms, silt fencing, fiber rolls, street sweeping, and general housekeeping measures to prevent stormwater contact with construction materials. Compliance with the SWPPP and BMPs would help minimize wastewater discharge and reduce the impact to water quality to a level of less than significance.

---

80 State Water Resources Control Board, 2009-0009-DWQ Construction General Permit, accessed July 2019, https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

81 U.S. Environmental Protection Agency, Water: Permitting (NPDES), accessed July 2019, https://www.epa.gov/npdes.

Impacts would be less than significant.

Operational Phase

The Project site is relatively flat, with surface water flows directed toward the existing municipal storm drains serving the campus. The proposed Project would include seismic upgrades and modernization improvements to existing buildings with similar uses; as a result, the amount of impervious surfaces on site upon Project completion would be similar to existing conditions. The proposed Project would also implement various drainage improvements within the center of the PSHS campus to redirect stormwater away from buildings and doorways. The two-fold drainage system would channel stormwater into the new landscaped areas and other catch basins throughout the Project site, where it can percolate back into the water table. In the event that the primary system fails, the secondary system would rely on the modifications made to the topography of the Project site to allow stormwater to drain away from campus buildings.

Lastly, a permanent erosion-control program, such as proper care of drainage control devices, would continue to be implemented upon Project completion. The amount of runoff from the Project site would not be substantially changed to that of existing conditions, as Project development would not increase the amount of runoff.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less than Significant Impact. The City's water supply is provided primarily from groundwater sources. The Desert Water Agency (DWA) provides water to the City of Palm Springs and the Project site.[82] As the proposed Project would implement various modernization improvements to existing PSHS campus buildings to meet current code requirements, the overall water consumption would not substantially change. The new efficient buildings may even result in a reduced water demand. Therefore, the proposed Project would not result in depleting existing groundwater supplies that could affect groundwater recharge. Additionally, no groundwater wells or other potential sources of groundwater are located on or near the Project site.

82 City of Palm Springs, General Plan, Recreation, Open Space and Conservation Element (2007).

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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 substantial erosion or siltation on or off site.

Less than Significant Impact. The Project would not alter the drainage pattern of the Project site or area in a manner that would result in erosion, siltation, or flooding on or off site. The Project does not propose to alter any drainage patterns in such a manner that would cause on- and off-site surface runoff impacts. The proposed Project would not involve an alteration in the course of a stream or river because there are no nearby streams or rivers.[83] Various hardscaping and landscaping improvements would be implemented as part of the proposed Project to redirect stormwater away from buildings and doorways on the Project site. An improved two-fold drainage system would channel stormwater in the new landscaped areas and other catch basins throughout the Project site, which would then be routed to the detention basin at the southeast corner of the Project site where it can percolate back into the water table. As such, the proposed Project would ultimately improve existing drainage conditions on the Project site.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite.

Less than Significant Impact. No streams or rivers are located within the Project site. Therefore, the proposed Project would not alter the existing drainage pattern of the site or area, including through the alternation of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on or off site.

The proposed Project would upgrade and modernize existing buildings; as a result, the amount of impervious surface on site upon proposed Project completion would be similar to existing conditions. Drainage patterns of the Project site would be improved as part of the proposed Project to better convey stormwater flow across the site. A two-fold drainage system would channel stormwater into the new

83 USFWS, National Wild and Scenic Rivers System, accessed January 2019, available at: https://rivers.gov/.

landscaped areas and other catch basins throughout the Project site, where it can percolate back into the water table. The Project does not propose to alter any drainage patterns in such a manner that would cause on- and off-site surface runoff impacts.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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.

Less than Significant Impact. The proposed Project would renovate and upgrade existing buildings on the existing PSHS campus. Various hardscaping and landscaping improvements would be implemented as part of the proposed Project to improve existing drainage conditions on the Project site. As previously noted, during proposed Project construction activities, BMPs for minimizing soil erosion would be implemented.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

iv. Impede or redirect flood flows.

Less than Significant Impact. The proposed Project would renovate and upgrade existing buildings on the Project site. The existing drainage pattern would be improved as part of the proposed Project to redirect stormwater away from buildings and doorways on the Project site. Implementation of the proposed Project would use the established drainage patterns and improvements of the Project site and surrounding area. As previously noted, during proposed Project construction activities, BMPs for minimizing soil erosion would be implemented.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

d. Is the project site subject to flooding or dam inundation?

Less than Significant Impact. As previously noted, both flood control structures within the City are required by the California State Water Code to be monitored for structural safety and that have the potential to pose a flooding risk to the City. However, in the event of failure, the Project site is located

outside the inundation pathway for both structures.[84] Due to this, threat of inundation is considered very low.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. The following describes potential impacts to people and structures from seiches, tsunamis, and mudflows. The proposed Project would not expose people or structures to inundation by seiche, tsunami, or mudflow.

Seiche

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. 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. There are no water storage facilities or bodies of water on or near the Project site; the nearest large body of water is the Salton Sea located nearly 30 miles to the southeast. The Project site is not located near any inland water bodies or water storage tanks that could pose a flood hazard to the site due to a seiche or failure.

No impacts would occur.

Tsunami

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The Project site is approximately 70 miles inland from the Pacific Ocean. Impacts from a tsunami are highly unlikely.

No impacts would occur.

Mudflow

A mudflow is a landslide composed of saturated rock debris and soil with a consistency of wet cement. The Project site and surrounding area are generally flat with gradual changes in elevation and there are

84 City of Palm Springs, *General Plan,* "Safety Element."

no major slopes or bluffs on or adjacent to the site. Land surrounding the Project site is developed and is generally flat. Impacts from mudflows are highly unlikely.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

f. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less than Significant Impact. The proposed Project would renovate and upgrade existing buildings. The proposed Project would be located on the previously developed PSHS campus. The amount of impervious surface on site at Project completion would be similar to existing conditions. The amount of runoff from the Project site would not be substantially changed to that of existing conditions, as proposed Project development would not increase the amount of runoff or contribute to the degradation of water quality.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

5.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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?	☐	☐	☒	☐
c. Would the proposed school conflict with any existing or proposed land uses, such that a potential health or safety risk to students would be created?	☐	☐	☐	☒

Discussion

a. Physically divide an established community?

No Impact. The proposed Project would consist of upgrades and modernization improvements to existing buildings. The proposed Project would be implemented on the existing PSHS campus. Proposed Project development would not divide any established residential communities. As development would occur within a developed high school campus, no new roadways or infrastructure that would bisect or transect the surrounding neighborhoods would be required.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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?

Less than Significant Impact. The City's General Plan designates the campus as School Use, with a zoning designation of Open Space. School uses are permitted under the General Plan's Land Use and Zoning Designation.[85]

85 City of Palm Springs, *General Plan, "*Land Use Element."

The proposed Project would entail seismic upgrades and modernization improvements to existing buildings and would not entail the construction of a new school. Project implementation would not change existing land uses or zoning designations or regulations.

The proposed Project would conform to the design and historical preservation policies of the City's General Plan.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Would the proposed school Project conflict with any existing or proposed land uses, such that a potential health or safety risk to students would be created?

No Impact. The proposed Project would upgrade and modernize existing buildings on the PSHS campus. There are no existing or proposed land uses surrounding the Project site that would pose a health or safety risk to students, teaches, campus staff, or visitors. Surrounding land uses consist of school, residential and recreation and commercial space. None of these land uses are considered a health or safety risk to students.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

5.12 MINERAL RESOURCES

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Result in the loss of availability of a known mineral resource that would be of future 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. Result in the loss of availability of a known mineral resource that would be of future value to the region and the residents of the State?

No Impact. According to the City's General Plan, the Project site is within as a Mineral Resources Zone 3 (MRZ-3), which is an area where significant mineral deposits cannot be evaluated based on current and available data.[86]

The Project site is developed and there are no records of mineral resources within the Project area.[87] The proposed Project would not disrupt any mining operations.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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?

No Impact. According to the City's General Plan, the Project site is within a Mineral Resources Zone 3 (MRZ-3).[88] The Project site and surrounding areas are developed and there are no records of significant mineral resources existing within the Project area.[89]

86 City of Palm Springs, *General Plan,* "Recreation, Open Space and Conservation Element."
87 City of Palm Springs, *General Plan,* "Recreation, Open Space and Conservation Element."
88 City of Palm Springs, *General Plan,* "Recreation, Open Space and Conservation Element."
89 City of Palm Springs, General Plan, "Recreation, Open Space and Conservation Element."

There one active sand-and-gravel mining operation within City of Palm Springs, which is located 5 miles northeast of the developed community, away from the Project site.[90] In addition, the Project site is developed within the existing PSHS campus and surrounded by urban development, making it unavailable as a mining site or mineral resource recovery site.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

90 City of Palm Springs, General Plan, "Recreation, Open Space and Conservation Element."

5.13 NOISE

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels 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. Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the educational program?	☐	☐	☐	☒
c. Generation of excessive ground-borne vibration or ground-borne noise levels?	☐	☒	☐	☐
d. 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 2 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?	☐	☐	☐	☒

Discussion

a. Generation of a substantial temporary or permanent increase in ambient noise levels the vicinity of the Project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less than Significant with Project Mitigation.

Noise Compatibility

The City's General Plan Noise Element[91] and the City's Noise Ordinance[92] include guidelines to evaluate ambient noise and land use compatibility. For schools, outdoor noise levels up to 65 A-weighted decibels (dB[A]) and indoor noise levels up to 45 dB(A) are considered acceptable. However, the City's General Plan

91 City of Palm Springs, *General Plan,* "Noise Element" (2007), accessed January 2019, http://www.palmspringsca.gov/home/showdocument?id=1986.

92 City of Palm Springs, Municipal Code, sec. 11.74.031, Noise Ordinance.

Noise Element recognizes that, due to increasing population and development, many of the City's roadways currently exceed the 65 dB(A) CNEL noise standard.[93]

Operation of the proposed Project would not increase vehicular traffic as the Project would not result in the addition of students. Operation of the proposed Project would not increase the ambient noise levels within the school campus. The improvements and renovations would retain the same use as existing conditions and would not generate any new traffic.

Stationary-Source Noise

The major sources of noise within the existing campus are from school bells, students, teachers, outdoor activities, and sporting events. School bells would continue to operate, and outdoor activity areas and sporting events would remain at their current locations. The nearest noise-sensitive receptors in the vicinity of the Project site would be the classrooms located within the Project site and the residences to the south across Ramon Road. There would be no change in the existing operations of the PSHS campus. The classrooms would continue to experience sporadic noise from school bells, outdoor activities, and sporting events. In addition, the proposed Project would not increase the surrounding population, nor would generate additional students who may generate noise. As such, the proposed Project would not result in an increase in the ambient noise at the vicinity of the Project site, and noise would remain similar to existing conditions.

Construction Noise

Construction activities would occur within close proximity to sensitive receptors. Sensitive receptors are found both on-site (students and faculty) and off-site (residential uses). Operational classrooms are located within the center of the Project site, east of the library, gymnasium, and cafeteria buildings. The nearest on-site sensitive receptors, existing operational classrooms, would be as close as approximately 35 feet east of the gymnasium. The nearest off-site sensitive receptors subject to elevated construction noise levels are the residences to the south across Ramon Road.

Construction staging would occur on the existing campus parking lots, including the eastern, southern, and northern lots along South Pavilion Way, East Ramon Road, and East Baristo Road, respectively. Construction of the proposed Project would take approximately 24 months.

93 City of Palm Springs, *General Plan,* "Noise Element."

Noise-sensitive receptors would be exposed to elevated construction noise levels when activities occur in proximity to these receptors. Additionally, existing school windows may be open because HVAC systems will not be fully functional during certain phases of construction, exacerbating the level of noise.

According to the City of Palm Springs Municipal Code, construction activities can only occur during the hours of 7:00 AM to 7:00 PM on weekdays and 8:00 AM to 5:00 PM on Saturdays, and not permitted on Sundays and holidays.[94] As the campus is typically in session from 7:30 AM to 3:00 PM, activities would occur during the most-sensitive timeframe. To further reduce exposure of noise-sensitive receptors (both on and off campus) to the proposed Project's construction-related activities, the District would coordinate the noisiest construction activities to occur during periods when school is not in session.

Estimated noise levels associated with demolition and construction activities generated during each of the proposed Project phases are presented in **Table: 5.13-1: Typical Maximum Noise Levels for Construction Phases**. Equipment estimates used for the analysis for demolition, grading, and building construction noise levels are representative of "worse-case" conditions since they assumed several pieces of equipment operating simultaneously. As shown in **Table 5.13-1**, sound generated by the noise source typically diminishes at a rate of 6 to 7.5 dB(A) for each doubling of distance.

Table 5.13-1
Typical Maximum Noise Levels for Construction Phases

	Approximate Leq dB(A)			
Construction Phase	**25 Feet**	**50 Feet**	**100 Feet**	**200 Feet**
Demolition	90	84	78	72
Site preparation	94	88	82	78
Building construction	94	88	82	78
Asphalt paving	85	79	73	67

Source: U.S Department of Transportation, Construction Noise Handbook, Chapter 9.0, August 2006.
Note: Leq = equivalent sound level.

The nearest sensitive receptor is a classroom located approximately 35 feet away from the gymnasium. Assuming a noise level of 94 dB(A) from 25 feet and a diminishing effect of 6 dB(A) per doubling distance, the classroom nearest to the proposed gymnasium improvements would experience a noise level of 72

94 City of Palm Springs, Municipal Code, sec. 8.04.220, Construction Times.

dB(A) in an outdoor setting. It is important to note that manmade or natural barriers can reduce noise levels. Solid walls and berms may reduce noise by 5 to 10 dB(A).[95]

The minimum noise reduction of exterior to interior noise provided by typical residential and commercial buildings in California is 17 dB(A) with open windows and 25 dB(A) with closed windows and similar standards would apply to classrooms and school buildings.[96]

Construction would occur over an approximate continuous 24-month period, with demolition and grading phases that generate the majority of noise. The District would schedule the most intensive demolition and construction activities during summer break when fewer students would be on campus, and the final phase of construction would occur during the late spring and summer terms. It is safe to assume that the noisiest pieces of equipment would be used when school is on break. According to the District, summer break begins during June and ends in early August, and winter break begins during the end of December and ends in early January.[97]

For construction phases that occur when school is in session, students would be in the classrooms for the majority of school hours. Assuming all classroom doors and windows are shut at all times, noise levels would drop substantially. An outdoor noise level of 72 dB(A) would be reduced to 47 dB(A) in an indoor setting. On school campuses, outdoor noise levels up to 65 dB(A) and indoor noise levels up to 45 dBA are generally considered acceptable.[98] An increase of 2 dB(A) in indoor uses would not be considered significant and would generally be unnoticeable as additional noise would be generated in class through lectures, movies and other classroom activities. Students may experience noise levels of 72 dB(A) during passing periods, nutrition and lunch breaks. While this increase is considered a nuisance, it would only be short-term and temporary and not considered significant.

Because construction activities would occur over an approximate continuous 24-month period, noise at the nearby sensitive receptors would constitute a potentially significant temporary noise impact. Noise levels on the Project site would be considered high for intermittent periods of time and would occur during the most-sensitive times during the day (7:30 AM to 2:30 PM).

Because construction activities will occur over an approximate continuous 24-month period, noise at the nearby sensitive receptors would constitute a potentially significant temporary noise impact. Noise levels

95 U.S. Department of Transportation (1980), 97.
96 U.S. Department of Transportation (1980), 97.
97 Palm Springs Unified School District (PSUSD), "School Year Calendars" accessed September 2019, https://www.psusd.us/Page/2#calendar1/20190924/month,
98 City of Palm Springs, General Plan, Noise Element (2007).

on the Project site would be considered high for intermittent periods of time and would occur during the most-sensitive times during the day (7:30 AM to 3:00 PM).

Construction activities would be limited to Project site and not surrounding campus. As with generated noise levels, construction activities would be scheduled to avoid critical school schedule periods (e.g., testing periods) to reduce vibration impacts while students are in class. Equipment that generates the highest levels of vibration would be scheduled to be operated after school hours to the degree possible or when classes are not in session. Off-site noise would be limited through maintain construction hours in accordance with the City's Noise Ordinance will continue to be a measure to restrict noise and vibration generation resulting from the future operations.[99] Off-site noise impacts would be less than significant.

Noise impacts from construction activities would be potentially significant during period when school is in session.

Mitigation Measures: The following mitigation measures have been identified to reduce impacts to less than significant:

NOI-1 The District shall direct construction activities that result in noise above 65 dB(a) to correspond with the school schedule to minimize noise and vibration impacts when classes are in session, and to avoid critical (testing) periods. Intensive construction activities such as demolition and grading shall be scheduled to occur after 3:00 PM Monday through Friday.

NOI-2 The District's construction contractor shall ensure that construction equipment is properly muffled according to industry standards and is in good working condition.

NOI-3 The District's construction contractor shall utilize diesel generators and compressors that are listed as "quiet units" by the manufacturer.

NOI-4 For all noise- and vibration-generating construction activity on the Project Site, the District's construction contractor shall employ additional noise and vibration attenuation techniques to reduce noise and vibration levels. Such techniques may include but are not limited to the use of sound blankets on noise-generating equipment and the construction of temporary sound barriers between construction sites and nearby sensitive receptors.

NOI-5 The District's construction contractor shall turn off all idling equipment when not in use for more than 5 minutes.

---

99 City of Palm Springs Municipal Code, sec. 11.74.031, Noise Ordinance.

NOI-6 The District's construction contractor shall disconnect backup alarms on vehicles that require them.

NOI-7 The District's construction contractor shall utilize temporary noise deflector walls during construction, where feasible.

NOI-8 The District's construction contractor shall place noise- and vibration-generating construction equipment and locating construction staging areas away from sensitive uses, including operating classrooms, where feasible.

NOI-9 The District's construction contractor shall coordinate the reduction of construction activities with nearby classrooms during exam periods to minimize noise and vibration. Provide construction activity schedules and try to minimize noisy and vibration generating activities when construction is taking place to the fullest extent practicable.

b. Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the educational program?

No Impact. The proposed Project would include improvements and renovations of the existing school, located approximately 1.45 miles west of SR 111 but along Ramon Road, a major thoroughfare in the City. The proposed Project would not generate any additional traffic. Internal vehicular circulation and access drives and surrounding roadways would stay the same and not result in any additional noise. Overall traffic noise would remain similar to existing conditions as there would be no change to existing operations of the PSHS campus. As such, roadway noise would not affect any educational program at the Project site or surrounding campus facilities. As such, roadway noise would not affect any educational program at the Project site or surrounding campus facilities.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

c. Generation of excessive ground-borne vibration or ground-borne noise levels?

Less than Significant Impact with Project Mitigation. Ground-borne vibration can be described as perceptible rumbling, movement, shaking or rattling of structures and items within a structure. Ground-borne vibration can generate a heightened disturbance in residential or in sensitive-prone areas. These vibrations can disturb structures and household items while creating difficulty for residential or school activities such as reading or other tasks. Although ground-borne vibration is sometimes perceptible in an outdoor environment, it is not generally deemed a problem as it is when this form of disturbance is

experienced inside a building. Ground-borne vibration can be measured in terms of amplitude and frequency or vibration decibels (VdB).

Construction activities could generate varying degrees of ground vibration, depending on the construction procedures, construction equipment used, and proximity to vibration-sensitive uses. Operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. Ground vibrations from construction activities rarely reach levels that could damage structures but can achieve perceptible ranges in buildings close to a construction site. It is not anticipated that the construction activities would result in substantial vibration.

In regard to operation, the proposed Project would not typically involve activities that would be expected to generate excessive vibration impacts. The improvement and renovated buildings would continue to operate similar to existing conditions.

Typical vibration levels at 25 feet away are shown in **Table: 5.13-2: Typical Vibration Levels.** A vibration velocity of 75 VdB is the approximate threshold between barely perceptible and distinctly perceptible for most people. However, vibration dissipates quickly with distance. As heavy construction equipment moves around the Project site, average vibration levels at the nearest sensitive receptors would diminish rapidly with increased distance between the receptors and the equipment. Typical source levels of construction equipment can range from 58 VdB for a small bulldozer to 87 VdB for an bulldozer at 25 feet.[100]

Table 5.13-2
Typical Vibration Levels

Equipment	Vibration (VdB) at 25 feet
Excavator	80
Large bulldozer	87
Backhoe	80
Loaded trucks	86
Roller	74
Small bulldozer	58

Source: Office of Planning and Environment, Federal Transit Administration, Transit Noise and Vibration Impact Assessment (May 2006) FTA-VA-90-1003-06, 12-9.

100 US Department of Transportation, Federal Transit Administration, *Transit Noise and Vibration Impact Assessment,* FTA report no. 0123 (September 2018), accessed December 2018, https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The results from vibration can range from no perceptible effects at the lowest vibration levels, to low rumbling sounds and perceptible vibration at moderate levels, to slight damage at the highest levels. The primary and most intensive vibration source associated with the development of the proposed Project would be the use of earthmoving equipment during construction.

Sensitive receptors are defined as schools, hospitals, resident care facilities, daycare centers, and residential communities. The nearest on-site sensitive receptors, existing operational classrooms, would be as close as approximately 35 feet east of the gymnasium. The closest historically significant buildings from the proposed improvements on the Project site are the first PSHS Buildings (classroom buildings 200, 300, and 700), located approximately 65 feet from the closest point to the library building. However, the proposed upgrades and modernization improvements to the library would are not anticipated to involve activities that would be expected to generate excessive vibration impacts. Heavy construction equipment may generate substantial levels of vibration that would cause annoyance to on- and off-site vibration-sensitive receptors. However, vibration dissipates quickly with distance. As heavy construction equipment moves around the site, average vibration levels at the nearest sensitive receptors would diminish rapidly with increased distance between the receptors and the equipment. As indicated, bull dozers are capable of producing 87.0 VdB at 25 feet, which is the approximate distance to the nearest classroom building throughout the Project's construction activities.

Therefore, both the nearest classrooms and the first PSHS Buildings are located outside the range of perceptible vibrations and construction of the proposed Project would not cause vibration-induced architectural damage or annoyance to nearby receptors.

As with generated noise levels, construction activities would be scheduled to avoid critical school schedule periods (e.g., testing periods) to reduce vibration impacts while students are in class. Equipment that generates the highest levels of vibration would be scheduled to be operated after school hours to the degree possible or when classes are not in session. However, as construction-related vibration levels would be considered high for intermittent periods of time throughout the 24-month construction schedule, impacts to students, staff, and faculty are considered to be potentially significant.

Construction activities would occur within the center of the Project site and not directly adjacent to the surrounding residential neighborhood. Construction activities would be restricted to daytime hours, which is when the surrounding off-site residences are the least sensitive to vibration intrusions. Impacts to off-site structures and buildings would be less than significant.

Mitigation Measures: **Mitigation Measures NOI-1, NOI-4, NOI-5, NOI-8,** and **NOI-9** have been identified to reduce impacts to less than significant.

d. 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 2 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?

No Impact. The Project site is located approximately 0.7 miles southwest of the Palm Springs International Airport. However, the Project site is located outside of the 70, 65, and 60 CNEL noise contours associated with the Airport.[101] There are no other private airports, airstrips, or heliport stations within the vicinity of the Project site. As such, the proposed Project would not exposed people in the Project area to excessive noise levels from an airport.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

101 City of Palm Springs, *General Plan,* "Noise Element," Fig. 8-6: Airport Noise Contours, accessed January 2019, http://www.palmspringsca.gov/home/showdocument?id=12179.

5.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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. 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)?

No Impact. The proposed Project does not include the development of new homes or businesses, and would not extend utilities off site, such as roads or other infrastructure. As such, it would not introduce any new population into the area. The number of students and faculty on site would not change due to proposed Project development.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. No housing exists on the Project site. The Project site is a developed high school campus. Therefore, proposed Project development would not displace any existing people or housing.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

5.15 PUBLIC SERVICES

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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:				
i. Fire protection?	☐	☐	☒	☐
ii. Police protection?	☐	☐	☒	☐
iii. Schools?	☐	☐	☐	☒
iv. Parks?	☐	☐	☐	☒
v. Other public services?	☐	☐	☐	☒
b. Does the site promote joint use of parks, libraries, museums, and other public services?	☐	☐	☐	☒

Discussion

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:

i. Fire protection?

Less than Significant Impact. Fire protection and emergency medical services in the City are provided by the PSFD. The nearest fire station to the Project site is Fire Station 2 (Palm Springs) at 300 North El Cielo Road, located approximately 1.0 miles northeast of the Project site.[102]

During construction and subsequent operation, the proposed Project would not interfere with any of the daily operations of the City's Emergency Plans nor would it require additional staff from the PSFD. All

102 City of Palm Springs, "Palm Springs Fire Stations," accessed July 2019, http://www.palmspringsca.gov/government/departments/fire-department/stations.

construction activities, including staging, would occur within the PSHS campus and would be required to be performed per the District's, City's, and PSFD's standards and regulations. In addition, construction associated with all upgrades to the buildings would be required to comply with all applicable fire code and CBC provisions to the satisfaction of the City and PSFD.

Project development would neither increase nor reduce the number of students and faculty on site. The proposed Project would not involve any circulation improvements or changes or existing ingress and egress points. Thus, access to and within the campus would remain adequate for emergency services. The proposed Project is not expected to result in an increase in calls for emergency fire and emergency medical services. Project development would not require the construction of new or expanded fire protection facilities.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

ii. Police protection?

Less than Significant Impact. Police protection services in the City are provided by the City of Palm Springs Police Department (PSPD), which operates out of its police facility at 200 Civic Drive, approximately half a mile northeast of the Project site.[103]

The proposed Project only involves upgrades and improvements to existing buildings on the PSHS campus. There would be no change in the number of students and faculty on site. While a majority of the Project site is currently secured, the proposed Project would incorporate any necessary fencing around the portions of the Project site undergoing construction to minimize trespassing and vandalism. With regards to safety during operation of the proposed Project, the buildings would include security lighting features to reduce demand on PSPD.

Therefore, police services would be adequate, and development of the proposed Project would not result in an increase in calls for police services, as it would not generate additional population. Project development would not require the construction of new or expanded police facilities.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

103 City of Palm Springs, "Police Department," accessed July 2019, http://www.palmspringsca.gov/government/departments/police.

iii. Schools?

No Impact. Proposed development would upgrade and modernize existing buildings. Development of the proposed Project would not generate additional students nor require the construction a new school; rather, it would improve facilities that currently serve the PSHS campus.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

iv. Parks?

No Impact. Demand for parks in an area are usually determined by the area's population. The proposed Project would not construct any dwelling units nor would it generate additional population. Demand for recreational services would remain the same. Therefore, the proposed Project would not require construction of new or expanded parks or recreational facilities.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

v. Other public facilities?

No Impact. A public library is provided by the City, which is located at 300 South Sunrise Way, approximately 0.25 miles northwest of the Project site. Implementation of the proposed Project would not require the construction of new or expanded library facilities, nor would the proposed Project increase the number of students and faculty on site. Demand for library services would remain the same compared to existing conditions.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

b. Does the site promote joint use of parks, libraries, museums, and other public services?

No Impact. Demand for public services in an area are usually determined by the area's population. The proposed Project would not result in any increase in population and would not construct any dwelling units. The proposed Project would not promote joint use of parks, libraries, museums, and other public services. The proposed Project would also not require construction of any of these public services.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

5.16 RECREATION

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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?	☐	☐	☐	☒
b. 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 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?

No Impact. Demand for parks and recreational facilities in an area are usually determined by the area's population. Implementation of the proposed Project would upgrade and modernize existing buildings. As there would be no increase to population, demand for recreational services would remain the same and deterioration to recreational facilities would not occur.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

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?

No Impact. Implementation of the proposed Project would upgrade and modernize existing buildings within the campus. No off-site recreational facilities are proposed, and none would be required.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

5.17 TRANSPORTATION

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
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* section 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. Are traffic and pedestrian hazards mitigated per Caltrans' *School Area Pedestrian Safety* manual?	☐	☐	☐	☒
e. Is the site easily accessible from arterials and is the minimum peripheral visibility maintained for driveways per Caltrans' Highway Design Manual?	☐	☐	☐	☒
f. Be within 1,500 feet of a railroad track easement?	☐	☐	☐	☒
g. Result in inadequate emergency access?	☐	☐	☐	☒

Discussion

a. Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less than Significant Impact.

Construction Phase

Short-term increases to traffic would occur during renovation and new constructions phases of the proposed Project. It is expected that construction workers would enter the campus via South Pavilion Way, East Ramon Road, or East Baristo Road. Staging areas and parking areas for construction would occur on the on the existing campus parking lots, including the eastern, southern, and northern lots along S. Pavilion Way, East Ramon Road, and East Baristo Road respectively. It is anticipated that construction workers would arrive and leave the construction site during off-peak school hours, thus minimizing any traffic increases for students, parents, and teachers. The amount of traffic generated by construction workers is considered incremental due to the relatively small-scale nature of the proposed Project.

Impacts would be less than significant.

Operational Phase

The existing buildings on the Project site would be upgraded and modernized to serve the existing students, faculty members and visitors by providing a modern facility that meets current standards. The proposed Project would not increase the population or generate additional students. As the upgrades to the facilities would not increase the existing student or faculty population on the campus, there would not be an anticipated increase in traffic volumes. Existing operation of the PSHS campus would remain similar compared to existing conditions.

Furthermore, the proposed Project would not require any new roadways or infrastructure to support events associated with the Project area. Due to overall conditions staying the same, the proposed Project would not conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

b. Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Less than Significant Impact. Section 15064.3, subdivision (b) states that evaluating a project's vehicles miles traveled (VMT) is the most appropriate measure of transportation impacts. As stated above, the proposed Project would upgrade and modernize 3 of the existing buildings on the PSHS campus, including with the addition of a mini-gym in the cafeteria and a lobby addition in the gymnasium. There would be no proposed changes to the existing operations of these facilities on the PSHS campus. In addition, the proposed Project would not increase the existing student or faculty population Therefore, the proposed Project would not result in a change in total VMT on the campus when compared to existing conditions.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less than Significant Impact.

Project Circulation and Design Features

The proposed Project would upgrade and modernize 3 buildings on the campus, including the addition of a mini-gym in the cafeteria and a lobby addition in the gymnasium. As such, the proposed Project would

not introduce any new roadways with sharp curves or dangerous intersections that would interrupt access to the PSHS campus for emergency response vehicles. Driveways to gain access to the PSHS campus would remain the same. In addition, as no changes are proposed to the surrounding road system, clear and uninterrupted access to the Project site for emergency response vehicles would continue to be provided via East Ramon Road.

Adherence to all emergency response plan requirements set forth by the City of Palm Springs and PSFD would be required through the duration of proposed Project construction and operation phases. Existing emergency access to properties along the surrounding roadways would not be altered or disrupted under construction and operational phases and no changes to the off-site roadway system would be necessary.

Impacts would be less than significant.

Conflicting or Incompatible Land Uses

The proposed Project would upgrade and modernize 3 buildings on the campus, including the addition of a mini-gym in the cafeteria and a lobby addition in the gymnasium. Surrounding land uses consist of residential, recreation and commercial space; the proposed Project would be compatible with surrounding land uses.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

d. Are traffic and pedestrian hazards mitigated per Caltrans' School Area Pedestrian Safety manual?

No Impact. The proposed Project would upgrade and modernize 3 buildings on the campus, including the addition of a mini-gym in the cafeteria and a lobby addition in the gymnasium. As there are no proposed circulation or roadway improvements, the proposed Project would not implement any improvements that could affect pedestrian and bicycle systems. Therefore, the proposed Project would not increase the exposure of students to traffic and pedestrian hazards. Surrounding roadways are already marked with appropriate school zone signs and crosswalks. As necessary, the proposed Project would comply with Caltrans traffic control requirements for school areas.[104]

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

104 California Department of Transportation, *Manual on Uniform Traffic Control Devices, Schools,* available at, http://www.dot.ca.gov/.

e. Is the site easily accessible from arterials and is the minimum peripheral visibility maintained for driveways per Caltrans' Highway Design Manual?

No Impact. The associated parking lots on the PSHS campus would provide access to the Project site and would be accessed via driveways along East Ramon Road. Additional parking on the campus is located off of South Farrell Drive and East Baristo Road. No changes are proposed to the surrounding road system or the on-site circulation system and driveways. No buildings, structures, or landscaping would be introduced near any of the existing driveways that would impair drivers' vision. Clear and uninterrupted access to the campus would continue to be provided via the existing access driveways.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

f. Is the proposed school site within 1,500 feet of a railroad track easement?

No Impact. The Project site is not within 1,500 feet of a railroad track easement.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

g. Result in inadequate emergency access?

No Impact. The proposed Project would be required to incorporate all applicable design and safety requirements as set forth in the most current adopted fire codes, building codes, and safety standards set forth by the City and PSFD. Existing emergency access to properties along the surrounding roadways would not be altered or disrupted under construction and operational phases and no changes to the off-site roadway system would be necessary. Project-related construction activities would not require lane closures of any surrounding roadways.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

5.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 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 the 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 Section 5024.1. In applying the criteria set forth in subdivision (d) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☒	☐	☐

Discussion

a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 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 the 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).

Less than Significant Impact with Project Mitigation. As discussed in **Section 5.5**, the existing PSHS campus buildings proposed for upgrades and improvements under the Project were originally constructed in the late 1950s and early 1970s. **Appendix C: Cultural Resources Background Data** provides that the existing library building and the cafeteria complex on the PSHS campus are eligible for listing in the CRHR.

The proposed Project includes a series of renovations and seismic upgrades to these two buildings, including the addition of the 7,400-square-foot mini-gym to the cafeteria. The Historic Resources Assessment Memo (see **Appendix C**) identified that the proposed improvements to the cafeteria and library buildings will not result in a substantial adverse changes that would affect their ability to retain their individual eligibility for listing in the CRHR.

Implementation of the proposed Project could result in substantial adverse changes to resources listed or eligible for listing resources in the CRHR, as defined in PRC Section 21074, or in a local register of historical resources as defined in PRC Section 5020.1(k).

Impacts would be potentially significant.

Mitigation Measures: **Mitigation Measures CUL-1** through **CUL-3** have been identified to reduce impacts to less than significant.

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 Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less than Significant with Project Mitigation. As discussed in the Cultural Resources Records Review (see **Appendix C**), a Sacred Lands File Search was conducted in November 2018 with the Native American Heritage Commission (NAHC) to determine whether there are sensitive or sacred Tribal Cultural Resources (TCRs) that could be affected by the proposed Project. The results of the search from the NAHC did not indicate the presence of any known TCRs within the immediate Project area.

AB 52 establishes a formal consultation process for California Native American tribes to identify potentially significant impacts to TCRs, as defined in PRC Section 21074 as part of CEQA. As specified in AB 52, lead agencies must provide notice to tribes that are traditionally and culturally affiliated with the geographic area of a proposed project if the tribe has submitted a written request to be notified. The NAHC provided a list of Native American groups and individuals who might have knowledge of the religious and/or cultural significance of resources that may be in and near the Project site.

In accordance with AB 52, the District provided notification to two California Native American tribes requesting consultation (pursuant to Public Resources Code Section 21080.3.1). Pursuant to this requirement, the District notified tribes (Agua Caliente Band of Cahuilla Indians and the Torres-Martinez Desert Cahuilla Indians) that have requested notification of the proposed Project under AB 52. The letters

notifying the tribes were mailed on September 16, 2019 (see **Appendix E**). The Agua Caliente Band of Cahuilla Indians and Torres-Martinez Desert Cahuilla Indians tribe will have until October 16, 2019 to respond to the District identifying any potential TCRs of concerns.

The Project site has been previously disturbed and has been developed with the existing PSHS campus buildings proposed for upgrades and improvements under the Project since the late 1950s and early 1970s. Implementation of the proposed Project would not involve substantial ground disturbing activities during the demolition and site preparation construction phases. As the presence of any documented cultural resources on the Project site is considered low, it is unlikely that those tribes requesting consultation from the District would identify any potential TCRs of concern that could be affected by implementation of the proposed Project.

Given this prior development of the campus, the presence of any documented cultural resources on the Project site is considered low, it is unlikely that demolition and construction, including earth disturbing activities, would identify any new potential TCRs of concern. However, as construction activities associated the proposed Project still has the potential to unearth undocumented archaeological and tribal cultural resources beneath the site.

Impacts could be potentially significant with incorporation of mitigation.

Mitigation Measures: The following mitigation measure has been identified to reduce impacts to less than significant.

TCR-1 In the event that cultural resources are unearthed during demolition and site preparation activities, all earth-disturbing work would be temporarily suspended or redirected until a qualified archaeologist has evaluated the nature and significance of the resources, in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2.

Construction personnel shall not collect or move any archaeological materials and associated materials. The designated archaeologist would consult with the Agua Caliente Band of Cahuilla Indians and the Torres-Martinez Desert Cahuilla Indians with regard to the identification of any cultural resources present on the Project site. After the resources have been addressed appropriately, work in the area may resume.

5.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
Would the Project:				
a. Require or result in the relocation or construction of new or expanded water, or wastewater treatment or stormwater 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 wastewater 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. Require or result in the relocation or construction of new or expanded water, or wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less than Significant Impact. The proposed Project would upgrade and modernize the cafeteria, library, and gymnasium buildings, including the addition of a mini-gym in the cafeteria and a lobby addition in the gymnasium. While there would be an increase in new building area, the renovated buildings are not anticipated to contain features that would generate a substantial increase in demand on water and wastewater.

While the amount of stormwater runoff from the Project site would be similar to that of existing conditions, the proposed Project involves the redesigning of existing hardscape and landscape to improve

existing drainage conditions on the Project site. Upon completion of the proposed Project, drainage runoff from the Project site would be adequately handled by an improved two-fold system, which would have the capacity to handle the drainage flows from the Project site. Project development would not require the construction or expansion of storm water drainage facilities to serve the Project site.

As the renovated buildings would be constructed to meet Title 24 and CalGreen requirements, it would be more energy efficient and would have a reduced energy demand. Thus, the existing energy infrastructure serving the Project site for electric power and natural gas. Lastly, the renovated buildings would be served by the existing telecommunication infrastructure that serves the Project site.

Mitigation Measures: No mitigation measures are required.

b. Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less than Significant Impact. The DWA provides water to the Project site. According to the DWA's 2015 Urban Water Management Plan, a planning document for water supply and demand, the total 2020 water supply is projected to be 52,800 acre-feet per year.[105] The DWA has sufficient supplies available to meet this projected demand during normal and dry years.[106] The proposed Project would renovate and upgrade existing buildings to become modernized facilities. While the proposed Project would involve the construction of a new mini-gym in the cafeteria and a lobby addition in the gymnasium, these additions would be constructed to meet Title 24 and CalGreen requirements it is not anticipated to contain features that would generate a substantial increase in demand on water and wastewater. Therefore, the proposed Project would not require the construction or expansion of water treatment facilities.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Result in a determination by the wastewater 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?

105 Desert Water Authority (DWA), *Final 2015 Urban Water Management Plan* (June 2016), pg. II-2, accessed July 2019, https://dwa.org/board-meeting-agenda/urban-water-management-plan/183-2015-urban-water-management-plan/file.

106 DWA, *Final 2015 Urban Water Management Plan*.

Less than Significant Impact. As mentioned before, the proposed Project is not anticipated to generate an increased demand on wastewater.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

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?

Less than Significant Impact. Palm Springs Disposal Services provides trash collection and recycling services to the City of Palm Springs, including the Project site.[107] The proposed Project would generate solid waste during site preparation and construction activities, and operations.

Based on the combined square footage of the proposed mini-gym and lobby additions at a total of square feet, and the standard construction waste generation of 4.34 pounds per square foot, this proposed new construction is estimated to generate 75,95ds per square foot, or approximately 38 tons of construction debris.[108] This estimate is conservative; it does not factor in any recycling or waste diversion programs. The construction debris associated with the other upgrades and renovations of the 3 buildings is not anticipated to generate a substantial amount of construction debris.

Operation of the upgraded and renovated buildings would be similar to existing conditions. In regard to the operation of the new mini-gym and lobby additions to cafeteria and gymnasium, respectively, these would generate solid waste typical for school facilities. Based on a net increase of approximately 75,950-square-feet of new building area and the generate rate of 0.007 square feet for school uses, these proposed additions would generated approximately 532 pounds, or 0.2 tons of solid was per day.[109] As with construction debris, this estimate is conservative as it does not factor in any recycling or waste diversion programs that would be implemented on the Project site.

107 City of Palm Springs, "Palm Springs Disposal," accessed July 2019, http://www.palmspringsca.gov/government/departments/public-works-engineering/weekly-trash-pick-up.

108 USEPA, "Estimating 2003 Building-Related Construction and Demolition Materials Amount," EPA530-R-09-002, (March 2009), accessed February 2019, https://www.epa.gov/sites/production/files/2017-09/documents/estimating2003buildingrelatedcanddmaterialsamounts.pdf.

109 CalRecycle, "Estimated Solid Waste Generation Rates," accessed July 2019, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates.

The amount of solid waste generated by the proposed Project during construction and operations would be within the available capacities at area landfills. Furthermore, the proposed Project would be required to comply all applicable federal, State, and local regulations related to solid waste.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

No Impact. Construction and operation of the proposed Project would comply with federal, State, and local statues and regulations related to solid waste. Solid waste generated by the proposed Project would not interfere with the California Integrated Waste Management Act, which requires that local municipalities implement programs to divert at least 50 percent of their solid waste from landfills. As such, impacts would be less than significant.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

5.20 WILDFIRES

	Potentially Significant Impact	Less than Significant with Project Mitigation	Less than Significant Impact	No Impact
If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
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?	☐	☐	☐	☒
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. 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?

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?

No Impact. The Project site is located in a developed and urbanized area of the City that does not contain wildlands or high fire hazard terrain or vegetation. The Project site is not located in a Very High Fire Hazard

Severity Zone.[110] As such, none of the above thresholds would be applicable to the proposed Project. No further analysis is required.

No impacts would occur.

Mitigation Measures: No mitigation measures are required.

110 CalFire, Riverside County (West) FHSZ Map, accessed July 2019, http://www.fire.ca.gov/fire_prevention/fhsz_maps_riversidewest.

5.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less than Significant with Project Mitigation	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 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?

Less than Significant Impact with Project Mitigation. The proposed Project would not have any significant impacts on the quality of the natural environment or on evidence of California's history or prehistory. Project development would implement various upgrades and renovations to existing buildings on the PSHS campus.

The Project site has been previously disturbed and graded and is surrounded by development. Natural communities and populations of rare or threatened plant or animal species do not exist on or near the Project site and therefore would not be impacted. While the Project site is within the boundaries of and

covered by the CVMSHCP, the Project site is already developed and is not in an area designated as a preserve under the CVMSHCP. As such, the proposed Project would not have the potential to substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal.

Additionally, under the criterion for evaluating properties for listing in the NRHP or CRHR for their association with the lives of persons important to the history of the campus, the existing cafeteria and library buildings appear to eligible for listing in the CRHR.[111] The proposed improvements to these buildings will not result in a substantial adverse changes that would affect their ability to retain their individual eligibility for listing in the CRHR.

Furthermore, the proposed Project would not result in significant environmental impacts that have the potential to degrade the quality of the environment.

The Project has the potential to result in potentially significant impacts.

Mitigation Measures: Implementation of **Mitigation Measures CUL-1** through **CUL-3** and **Mitigation Measure TCR-1** have been identified to reduce potential impacts to less than significant.

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.)

Less than Significant Impact. Development of the proposed Project would not result in impacts that are individually limited but cumulatively considerable. The proposed Project would be developed on the existing campus. The proposed Project would be consistent with the General Plan and zoning designations of the Project site. Therefore, the proposed Project would not weigh short-term goals above long-term environmental goals of the City.

Issues relevant to the proposed Project are localized and confined to the immediate Project area. There are no unusual circumstances relating to the proposed Project. Individual projects would be required to undergo environmental review in accordance with CEQA before any of these improvements are

111 Daly & Associates, *Final HRA Report* (March 2013).

implemented by the District. No significant cumulatively considerable impacts are anticipated to result from the proposed Project.

Impacts would be less than significant.

Mitigation Measures: No mitigation measures are required.

c. Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less than Significant Impact with Project Mitigation. The proposed Project's potential significant impacts from construction related noise and vibration that could have significant environmental effects on human beings, either directly or indirectly.

Mitigation Measures: Implementation of applicable **Mitigation Measures (NOI-1** thru **NOI-9)** noted in **Sections 5.13** have been identified to reduce impacts from noise and vibration during construction activities that could adversely affect humans to less than significant.

6.0 REFERENCES

The following documents and information were used in the preparation of this IS/MND:

California Air Resources Board (CARB), "AB 32 Scoping Plan" (last reviewed January 8, 2019), accessed January 2019, http://www.arb.ca.gov/cc/scopingplan/scopingplan.htm.

California Air Resources Board (CARB), "Area Designations Maps/State and National," accessed January 2019, http://www.arb.ca.gov/desig/adm/adm.htm.

California Air Resources Board (CARB), "Assembly Bill 32 Overview" (last reviewed August 4, 2014), accessed January 2019, http://www.arb.ca.gov/cc/ab32/ab32.htm.

California Building Standards Commission, "California Building Standards Code (California Code of Regulations, Title 24)," accessed July 2019, available at http://www.bsc.ca.gov/codes.aspx.

California Code of Regulations, sec. 15000, et seq., State *CEQA Guidelines*.

California Department of Conservation, Division of Land Resource Protection, *Riverside County Important Farmland 2016,* map, sheet 2 of 3 (July 2017), accessed July 2019, available at https://www.conservation.ca.gov/dlrp/fmmp.

California Department of Conservation, *Map Data Layer Viewer,* accessed July 2019, https://maps.conservation.ca.gov/cgs/DataViewer/.

California Department of Fire and Forestry Protection, "California Fire Hazard Zone Map Update Project," accessed July 2019, available at: http://www.fire.ca.gov/fire_prevention/fire_prevention_wildland_zones_maps.

California Department of Fish and Wildlife, California Natural Diversity Database, *RareFind,* database, accessed July 2019, https://www.wildlife.ca.gov/Data/CNDDB/Maps-and-Data.

California Department of Transportation, *California Scenic Highway Mapping System,* "Riverside County," accessed July 2019, http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

California Department of Transportation, *Manual on Uniform Traffic Control Devices, Schools,* available at, http://www.dot.ca.gov/.

California Education Code, sec. 17317, AB 300, Corbett. Seismic safety: Schools.

California Energy Commission, *2016 Building Energy Efficiency Standards for Residential and Nonresidential Buildings* (June 2015), accessed July 2019, https://www.energy.ca.gov/2015publications/CEC-400-2015-037/CEC-400-2015-037-CMF.pdf.

CalFire, Riverside County (West) FHSZ Map, accessed July 2019, http://www.fire.ca.gov/fire_prevention/fhsz_maps_riversidewest.

California Governor's Office of Emergency Services, "California Accidental Release Prevention Program FAQ" (February 2014,) accessed July 2019, http://www.caloes.ca.gov/FireRescueSite/Documents/CalARP%20FAQ%20-%20Feb2014.pdf.

CalRecycle, "Estimated Solid Waste Generation Rates," accessed July 2019, https://www2.calrecycle.ca.gov/WasteCharacterization/General/Rates.

City of Palm Springs, *Airport Master Plan* (approved October 2015), accessed July 2019, available at http://www.palmspringsca.gov/government/departments/planning/specific-plans/airport-master-plan.

City of Palm Springs, *Citywide Reconnaissance Survey* (June 2004).

City of Palm Springs, Department of Planning Services, Historic Site Preservation Board, "Class 1 and Class 2 Historic Sites, Historic Districts, and Properties Listed on the National Register of Historic Places" (Revised April 11, 2018), accessed 2019, http://www.palmspringsca.gov/home/showdocument?id=58223.

City of Palm Springs, *General Plan,* "Circulation Element" (2007), accessed July 2019, http://www.palmspringsca.gov/home/showdocument?id=1973.

City of Palm Springs, *Historic Resources Survey* (June 2004).

City of Palm Springs, General Plan, "Community Design Element" (2007), accessed July 2019, http://www.palmspringsca.gov/home/showdocument?id=1977.

City of Palm Springs, *General Plan,* "Recreation, Open Space and Conservation Element" (2007), accessed July 2019, http://www.palmspringsca.gov/home/showdocument?id=1981.

City of Palm Springs, *General Plan,* "Land Use Element" (1996), accessed January 2019, http://www.palmspringsca.gov/home/showdocument?id=1969.

City of Palm Springs, *General Plan,* "Safety Element" (2007) accessed July 2019, http://www.palmspringsca.gov/home/showdocument?id=1975.

City of Palm Springs, *Local Hazard Mitigation Plan* (August 2012), accessed July 2019, http://www.palmspringsca.gov/home/showdocument?id=34811.

City of Palm Springs Municipal Code, sec. 11.74.031, Noise Ordinance.

City of Palm Springs, Municipal Code, sec. 11.36.010, Wildlife Protection.

City of Palm Springs, Municipal Code, sec. 8.04.220, Construction Times.

City of Palm Springs, Municipal Code, tit. 8, Buildings and Construction.

City of Palm Springs, "Palm Springs Disposal," accessed July 2019, http://www.palmspringsca.gov/government/departments/public-works-engineering/weekly-trash-pick-up.

City of Palm Springs, "Palm Springs Fire Stations," accessed July 2019, http://www.palmspringsca.gov/government/departments/fire-department/stations.

City of Palm Springs, "Police Department," accessed July 2019, http://www.palmspringsca.gov/government/departments/police.

City of Palm Springs, "Traffic Data," accessed July 2019, http://www.palmspringsca.gov/government/departments/public-works-engineering/traffic-management-center/traffic-data.

Coachella Valley Association of Governments, *Coachella Valley Coachella Valley Multiple Species Habitat Conservation Plan,* accessed July 2019, available at http://www.cvmshcp.org/.

Code of Federal Regulations, ch. 40, pt. 763—Asbestos, accessed January 2019, available at https://www.epa.gov/sites/production/files/documents/2003pt763_0.pdf.

Daly & Associates, *Final HRA Report* (March 2013).

Daly & Associates, *Historic Resources Assessment Memorandum for the Palm Springs High School Campus* (Historic Resources Assessment Memo)*,* (July 2019).

Desert Water Authority (DWA), *Final 2015 Urban Water Management Plan* (June 2016), pg. II-2, accessed July 2019, https://dwa.org/board-meeting-agenda/urban-water-management-plan/183-2015-urban-water-management-plan/file.

Division of the State Architect, "Education Code: Section 17317," accessed July 2019, http://www.dgs.ca.gov/dsa/AboutUs/ab300/ab300edcode.aspx.

South Coast Air Quality Management District (SCAQMD), *Final 2016 Air Quality Management Plan* (March 2017), accessed September 2019, http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/final2016aqmp.pdf.

SCAQMD, *General Forecast Areas and Air Monitoring Areas*, map, accessed January 2019, http://www.aqmd.gov/docs/default-source/default-document-library/map-of-monitoring-areas.pdf.

SCAQMD, "Facility Information Detail (F.I.N.D.)," accessed January 2019, https://www.aqmd.gov/nav/FIND/facility-information-detail.

State Water Resources Control Board, 2009-0009-DWQ Construction General Permit, accessed July 2019, https://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml.

US Department of Transportation, Pipeline and Hazardous Materials Safety Administration, *National Pipeline Mapping System, Public Viewer*, accessed July 2019, https://pvnpms.phmsa.dot.gov/PublicViewer/.

US Environmental Protection Agency (USEPA), "Estimating 2003 Building-Related Construction and Demolition Materials Amount," EPA530-R-09-002, (March 2009), accessed February 2019, https://www.epa.gov/sites/production/files/2017-09/documents/estimating2003buildingrelatedcanddmaterialsamounts.pdf.

USEPA, *Stormwater Pollution Prevention Plan (SWPPP)*, accessed July 2019, https://www.epa.gov/npdes.

United States Fish and Wildlife Service (USFWS), *National Wetlands Mapper,* accessed July 2019, https://www.fws.gov/wetlands/data/mapper.html

USFWS, National Wild and Scenic Rivers System, accessed January 2019, available at: https://rivers.gov/.

United States Geological Survey, Quadrangle Map—Palm Springs (1996).

7.0 LIST OF PREPARERS

LEAD AGENCY

Palm Springs Unified School District

Julie Arthur, Executive Director of Facilities Planning & Development

Nathaniel Rodriguez, Project Manager

IS/MND PREPARATION

Meridian Consultants LLC

Joe Gibson, Partner

Christ Kirikian, MS, Associate Principal, Director of Air Quality and Acoustics

Candice Woodbury, Project Manager

Kristine Jegalian, Project Planner

Lisa Maturkanic, Sr. Operations Administrative Manager

Rachel Bastian, Publications Specialist

Matt Lechuga, Production Coordinator

Tom Brauer, Graphics Specialist

PaleoWest Archaeology

Vanessa Mirro, MA, RPA, Vice President and California Principal

Roberta Thomas, MA, RPA

Daly and Associates

Pamela Daly, M.S.H.P., Principal