January 2021 | Initial Study

RIDGEVIEW HIGH SCHOOL PROJECT

Paradise Unified School District

Prepared for:

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PLACEWORKS

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Abbreviations and Acronyms

AAQS	ambient air quality standards
AB	Assembly Bill
ACM	asbestos-containing materials
ADT	average daily traffic
amsl	above mean sea level
AQMP	air quality management plan
AST	aboveground storage tank
BAU	business as usual
bgs	below ground surface
BMP	best management practices
CAA	Clean Air Act
CAFE	corporate average fuel economy
CalARP	California Accidental Release Prevention Program
CalEMA	California Emergency Management Agency
Cal/EPA	California Environmental Protection Agency
CAL FIRE	California Department of Forestry and Fire Protection
CALGreen	California Green Building Standards Code
Cal/OSHA	California Occupational Safety and Health Administration
CalRecycle	California Department of Resources, Recycling, and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CBC	California Building Code
CCAA	California Clean Air Act
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation and Liability Act
cfs	cubic feet per second
CGS	California Geologic Survey
CMP	congestion management program
CNDDB	California Natural Diversity Database
CNEL	community noise equivalent level

Abbreviations and Acronyms

CO	carbon monoxide
CO_2e	carbon dioxide equivalent
Corps	US Army Corps of Engineers
CSO	combined sewer overflows
CUPA	Certified Unified Program Agency
CWA	Clean Water Act
dB	decibel
dBA	A-weighted decibel
DPM	diesel particulate matter
DTSC	Department of Toxic Substances Control
EIR	environmental impact report
EPA	United States Environmental Protection Agency
EPCRA	Emergency Planning and Community Right-to-Know Act
FEMA	Federal Emergency Management Agency
FHWA	Federal Highway Administration
FTA	Federal Transit Administration
GHG	greenhouse gases
GWP	global warming potential
HCM	Highway Capacity Manual
HQTA	high quality transit area
HVAC	heating, ventilating, and air conditioning system
IPCC	Intergovernmental Panel on Climate Change
L_{dn}	day-night noise level
L_{eq}	equivalent continuous noise level
LBP	lead-based paint
LCFS	low-carbon fuel standard
LOS	level of service
LST	localized significance thresholds
M_W	moment magnitude
MCL	maximum contaminant level
MEP	maximum extent practicable
mgd	million gallons per day
MMT	million metric tons

Abbreviations and Acronyms

MPO	metropolitan planning organization
MT	metric ton
MWD	Metropolitan Water District of Southern California
NAHC	Native American Heritage Commission
NO_X	nitrogen oxides
NPDES	National Pollution Discharge Elimination System
O_3	ozone
OES	California Office of Emergency Services
PM	particulate matter
POTW	publicly owned treatment works
ppm	parts per million
PPV	peak particle velocity
RCRA	Resource Conservation and Recovery Act
REC	recognized environmental condition
RMP	risk management plan
RMS	root mean square
RPS	renewable portfolio standard
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SCAG	Southern California Association of Governments
SCAQMD	South Coast Air Quality Management District
SIP	state implementation plan
SLM	sound level meter
SoCAB	South Coast Air Basin
SO_X	sulfur oxides
SQMP	stormwater quality management plan
SRA	source receptor area [or state responsibility area]
SUSMP	standard urban stormwater mitigation plan
SWP	State Water Project
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	toxic air contaminants
TNM	transportation noise model

Abbreviations and Acronyms

tpd	tons per day
TRI	toxic release inventory
TTCP	traditional tribal cultural places
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment

1. Introduction

Paradise Unified School District (PUSD or District) intends to construct a single-story classroom and administration facility building that would serve as a continuation school, with a modified softball playing field, and one basketball court at 5944 Maxwell Drive, Paradise in the central part of the town in Butte County.

1.1 PROJECT LOCATION

Paradise is located along State Route (SR) 191, approximately 55 miles southeast of the City of Red bluff and approximately 15 miles northeast of the City of Chico. Adjacent communities include the town of Magalia to the north, the community of Centerville to the northwest, and the community of Concow to the east (see Figure 1, *Regional Location*). Paradise is in north central Butte County where the western slopes of the Cascade and Sierra Nevada ranges meet. The topography in the area is composed of mostly steeper canyons from the major drainages. The town is situated at an elevation of between 1,500 and 2,200 feet.

As shown in Figure 2, *Local Vicinity and* Figure 3, *Aerial Photograph*, the approximately 2.14-acre vacant project site is east of Maxwell Drive and north of Pleasant Lane. The project site is comprised of four parcels — Assessor Parcel Numbers 053-110-065-000, 053-110-064-000, 053-110-010-000, 053-110-009-000.

Regional access to the project site is provided via the Skyway and SR 191 (See Figure 1, *Regional Location* and Figure 2, *Local Vicinity*). The Skyway connects from SR 99 just south of Chico to Paradise in a southeasterly direction. SR 191 connects from SR 70 just north of Oroville to Paradise in a northerly direction. Local access to the project site is via Maxwell Drive and Pleasant Lane (See Figure 2, *Local Vicinity*).

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Land Use

As shown in Figure 3, *Aerial Photograph*, the project site consists of vacant land with an existing parking lot in the southwest region of the site. There are no buildings or structures onsite. Vegetation onsite consists mostly of small shrubs and trees. The project site is relatively steep with a moderate slope across the site that extends downward from the northwest to the southeast. As shown in Figure 5, *Overall Site Plan with Topo,* onsite elevations range from approximately 1,844.8 to 1,887.5 feet above mean sea level.

1.2.2 Surrounding Land Use

As shown in Figure 3, the project site is surrounded by a mix of residential, commercial, and public institutional development and vacant land. Though much of the surrounding land is zoned residential, the Camp Fire in 2018 destroyed many residential structures. To the north and abutting the project site is vacant land with single-family residences beyond (zoned TR 1/2); to the south, across Pleasant Lane is vacant land with single-family

residences beyond (zoned CF, TR 1/2, TR 1/3); to the east and abutting the project site is vacant land with commercial uses beyond (zoned TR 1/2, TR 1/3, CC); and to the west, across Maxwell Drive is Paradise High School with vacant land, single-family residences and commercial uses beyond (zoned CF, TR 1/2, TR 1/3, CC).

1.3 PROJECT DESCRIPTION

Below is a detailed description of the proposed project's overall site plan and character, including the various development features/elements and on- and off-site improvements that would be implemented as a part of the project.

1.3.1 Site Plan and Character

The proposed Ridgeview High School (Project) would be constructed at 5944 Maxwell Drive, Paradise, California on a District-owned parking lot across Maxwell Drive from the existing Paradise High School. The proposed project involves the construction of a single-story classroom and administration building, modified softball field, and one basketball court. Additionally, the proposed project would provide spaces for up to 25 cars.

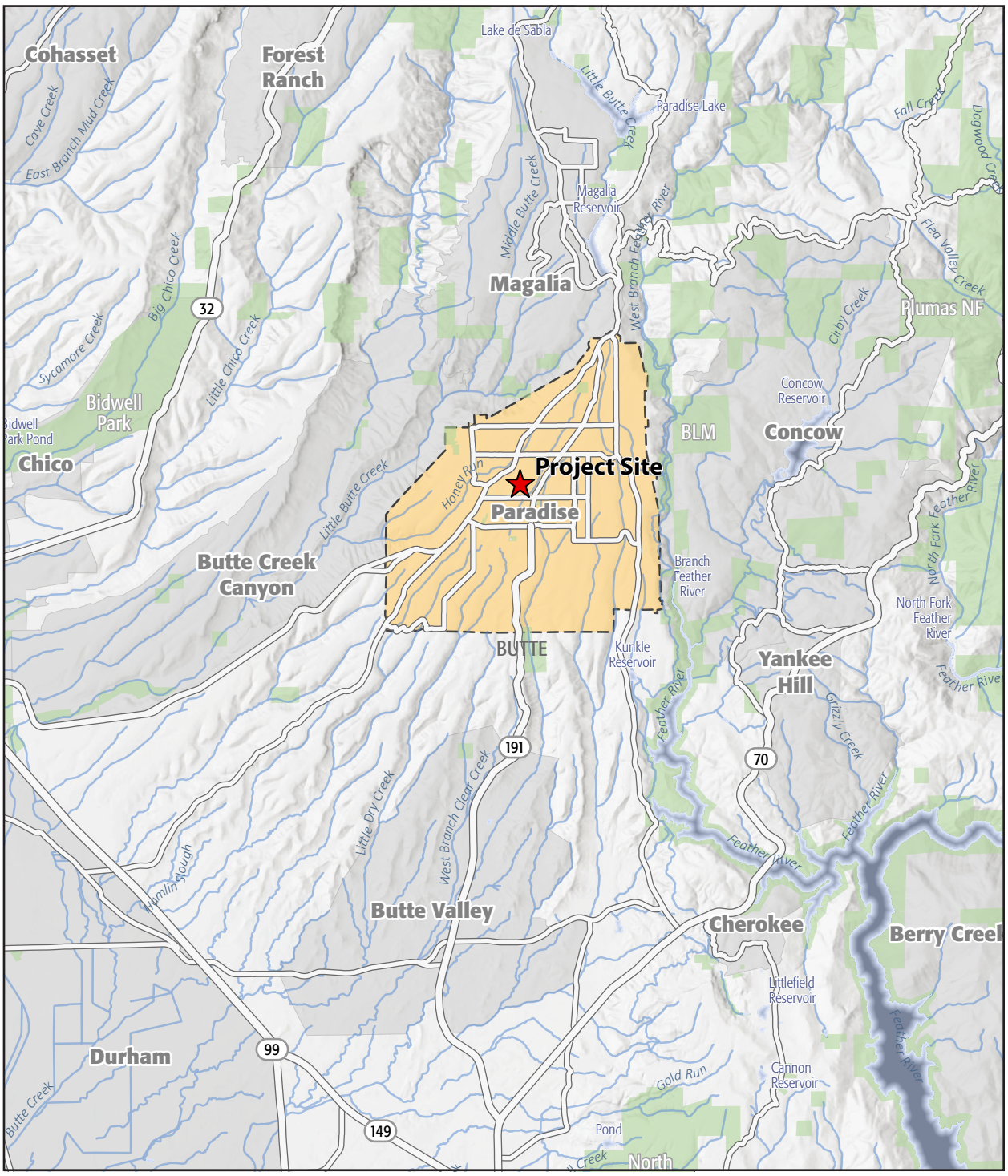
The Ridgeview High School would serve as the District's continuation high school and would house approximately 150 students. The District's current continuation school is located at 13835 West Park Drive, in the town of Magalia, approximately 3.5 miles northeast of the project site. No increase in enrollment is expected. The high school campus would house students in grades ten through twelve.

Figure 4, *Overall Site Plan*, illustrates the project's site design. The project would be designed as a contemporary high school. As shown in Figure 5, *Overall Site Plan with Topo,* the site design involves four graded levels for the proposed structures, softball field, and basketball court and includes retaining walls for erosion control. The site layout creates a protected area separate from the surrounding streets and parking lots for the student's basketball court and modified softball field for student use. As shown in Figure 6, *Ridgeview High School Building Exterior Elevations,* the building would include vertical and horizontal cementitious siding, clerestory windows, stone veneer columns, and a metal roof.

1.3.2 Architectural Design and Character

As shown in Figure 4, the single-story classroom and administration building would total approximately 11,355 square feet and provide six classrooms. Architecturally and functionally, the rectangular-shaped building would be designed and constructed as a single-story building (with heights ranging from 18 to 27 feet) that would connect pedestrians with a covered concrete walkway, stairs, and ramp. The building would house the proposed classrooms, a multipurpose room, and administration offices. Primary entrance to the main building would be from the southern end of the building, which faces Pleasant Drive. The portion of the building that would be occupied by the multipurpose room would be the tallest portion of the building at approximately 27 feet.

Figure 1 - Regional Location



Paradise City Boundary
Parks and Open Spaces
Creeks

0 3
Scale (Miles)

Source: ESRI, 2020; PlaceWorks, 2020

1. Introduction

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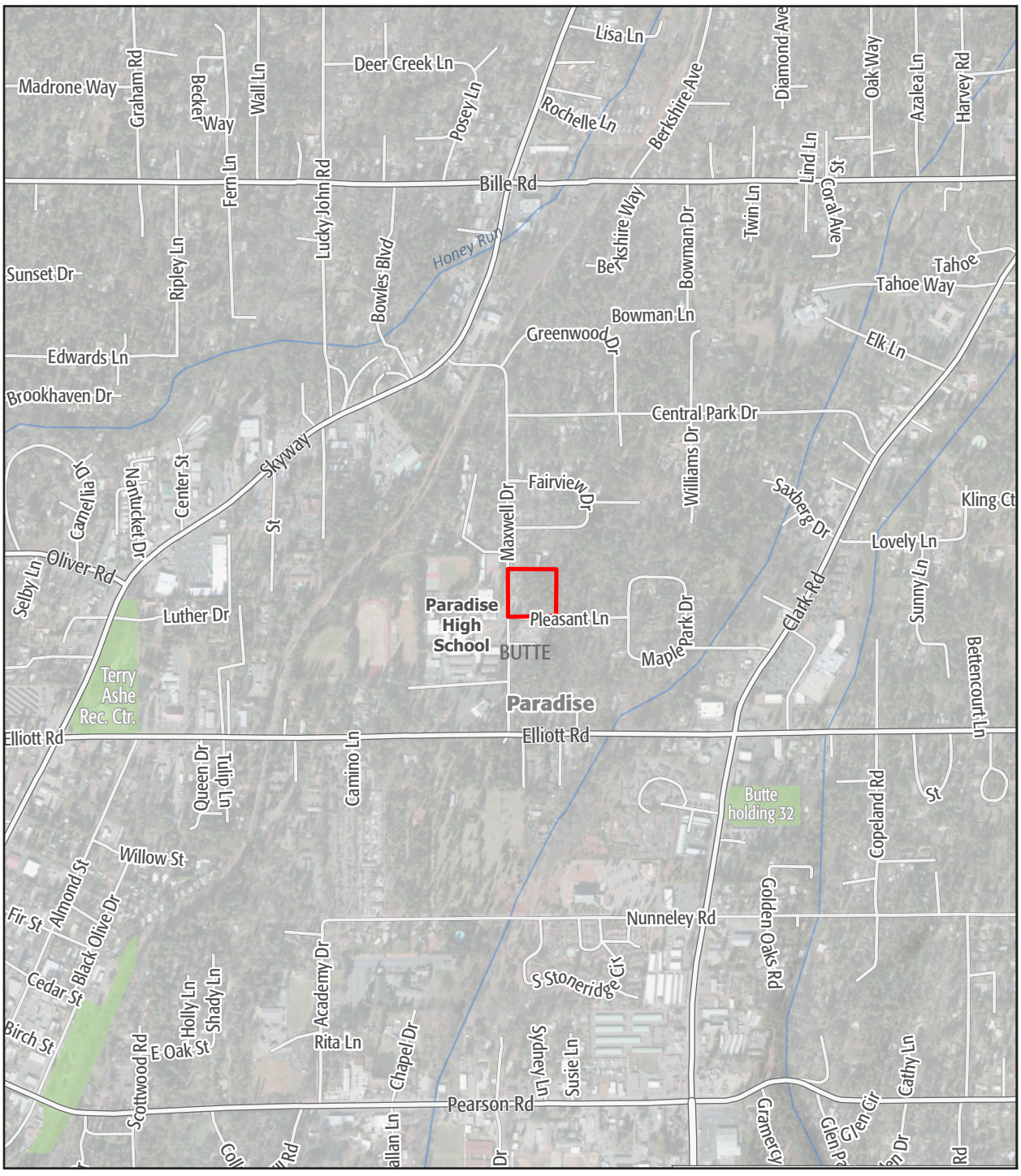
Figure 2 - Local Vicinity



Project Site
Parks and Open Spaces
Creeks

0 1,000
Scale (Feet)

Source: ESRI, 2020; PlaceWorks, 2020

1. Introduction

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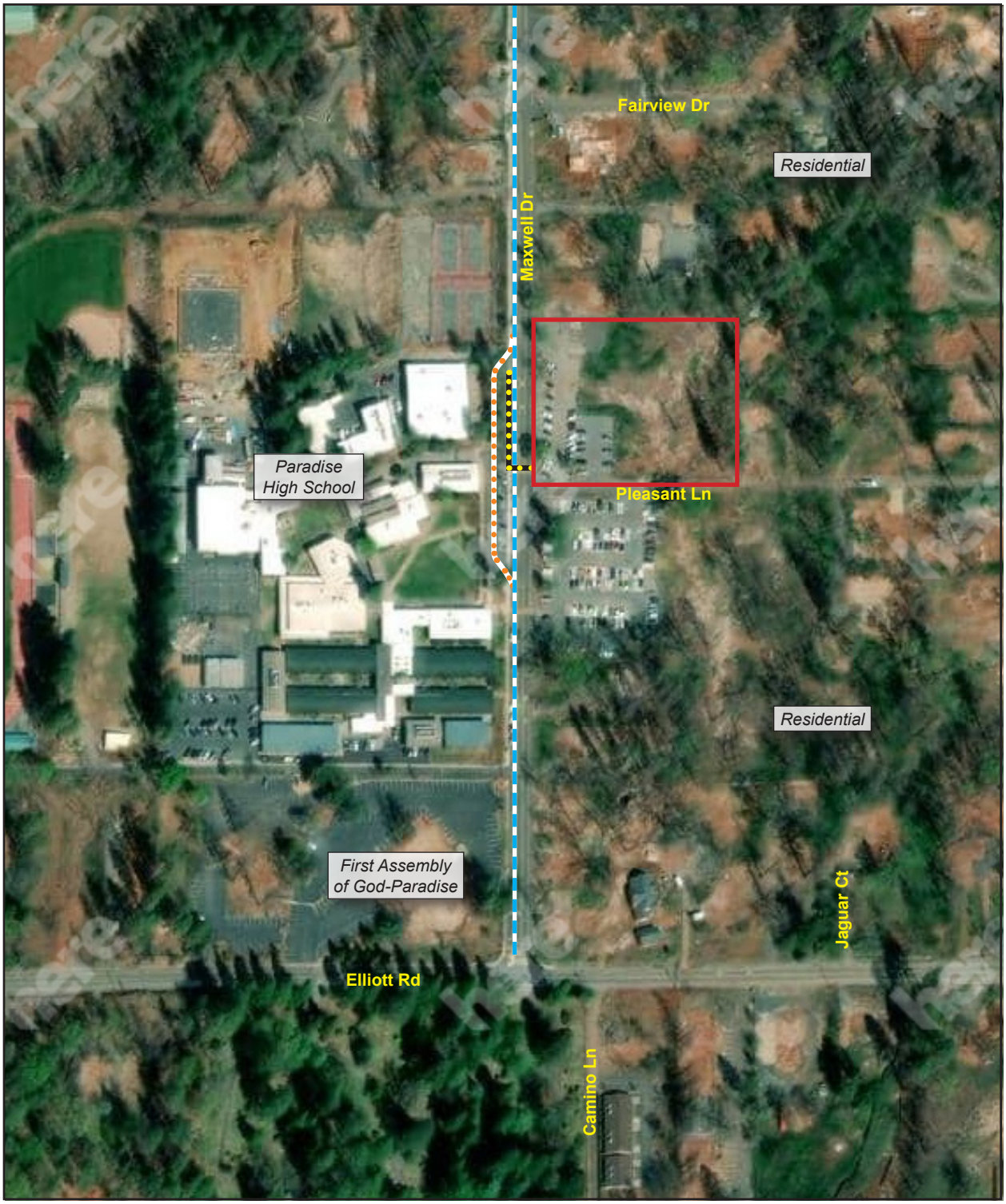
Figure 3 - Aerial Photograph



Source: Nearmap, 2021; PlaceWorks, 2020

1. Introduction

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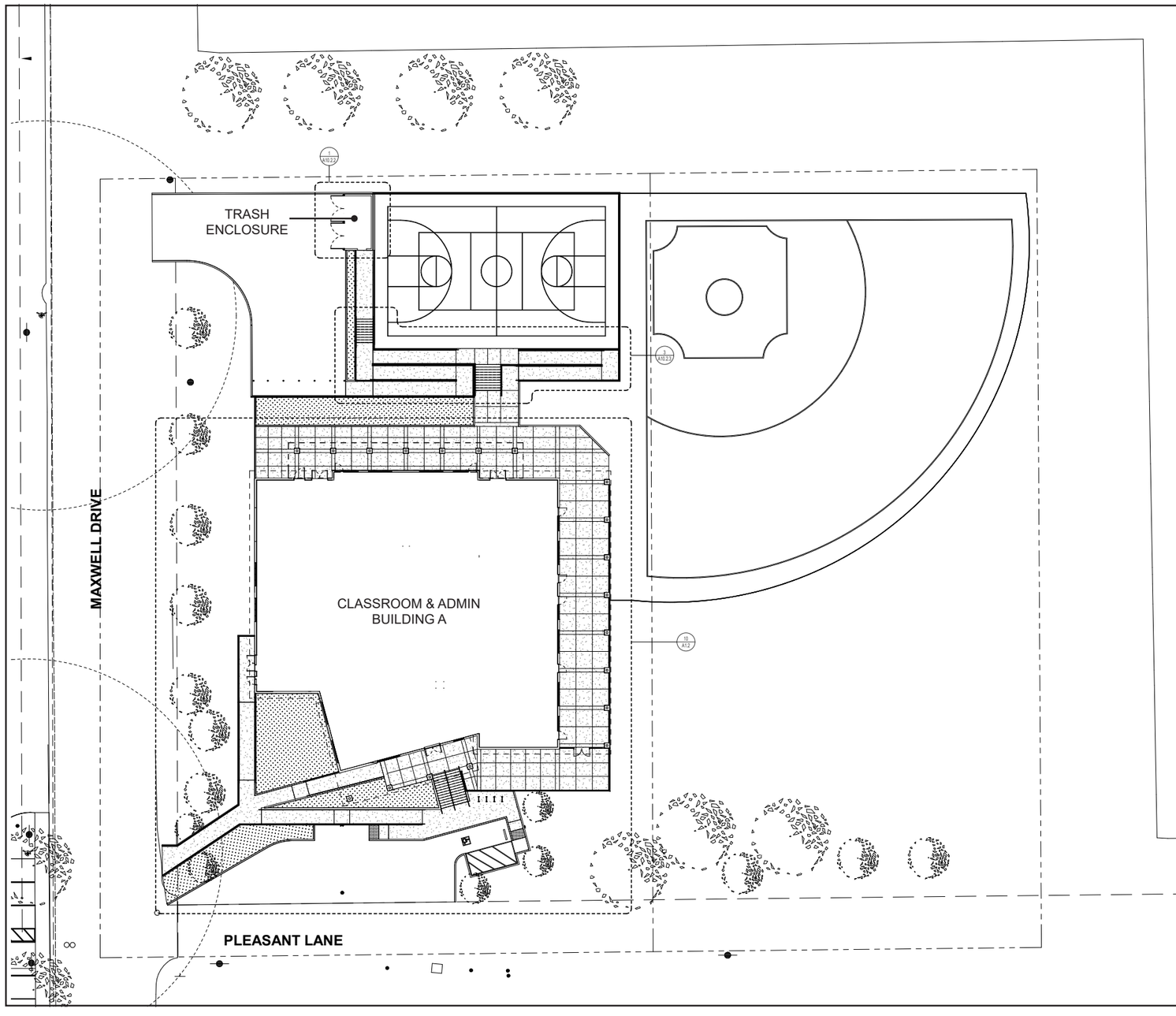
Figure 4 - Overall Site Plan



GENERAL NOTES

1. CONTRACTOR IS RESPONSIBLE FOR 6'-0" HIGH TEMPORARY CONSTRUCTION BARRIER WITH VISION SCREEN AT STAGING, STORAGE AND CONSTRUCTION AREA WITH SIGNAGE EVERY 20'-0" TO WARN STUDENTS OF CONSTRUCTION AREA.
2. CONTRACTOR TO BRING IN OFFICE TRAILER TO CONSTRUCTION AREA.
3. CONTRACTOR TO REPAIR BACK TO EXISTING CONDITIONS ALL LAYDOWN AREAS AT THE END OF CONSTRUCTION. THIS INCLUDES LANDSCAPE AREAS AND ANY BROKEN SPRINKLERS, VALVE BOXES, CONCRETE, ASPHALT, ETC.
4. CONTRACTOR SHALL REPLACE, RECONSTRUCT AND REPAIR ALL EXISTING WORK THAT IS IMPACTED, DAMAGED, OR DESTROYED AS A RESULT OF ANY CONTRACTOR WORK INCLUDING, BUT NOT LIMITED TO, HARDSCAPING, SIDEWALKS, IRRIGATION SYSTEMS, LANDSCAPING, LAWNS, STRUCTURES AND UTILITIES - ALL TO THE SATISFACTION OF THE DISTRICT.
5. WHERE ASPHALT OR CONCRETE IS BEING REPATCHED, CONTRACTOR SHALL PROVIDE EVEN AND STRAIGHT LINE CUTS WITH 2-FOOT STRAIGHT SLURRY SEAL SURFACE PATCH ON BOTH SIDES OF CUT.
6. CONTRACTOR SHALL EXERCISE EXTREME CAUTION IN EXCAVATING AND TRENCHING ON SITE TO AVOID EXISTING DUCTS, PIPING OR CONDUITS, ETC., AND TO PREVENT HAZARDS TO PERSONNEL AND/OR DAMAGE TO EXISTING UNDERGROUND UTILITIES OR STRUCTURES WHETHER OR NOT SHOWN AND INSTALLED BY ANY OTHER CONTRACTS. THE ARCHITECT IS NOT RESPONSIBLE FOR THE LOCATION OF UNDERGROUND UTILITIES OR STRUCTURES WHETHER OR NOT SHOWN OR DETAILED AND INSTALLED BY ANY OTHER CONTRACTS. THE CONTRACTOR SHALL IMMEDIATELY NOTIFY THE ARCHITECT SHOULD SUCH UNIDENTIFIED CONDITIONS BE DISCOVERED. THESE DRAWINGS AND SPECIFICATIONS DO NOT INCLUDE THE NECESSARY ELEMENTS FOR CONSTRUCTION SAFETY.
7. GATES IN PATH OF TRAVEL SHALL COMPLY WITH EXIT DOOR REQUIREMENTS WITH PROPER LEVER HARDWARE AND KICK PLATES.

LEGEND

- 4" CONCRETE OVER 6" CLASS II AGGREGATE BASE
- ASPHALT PAVING
- LANDSCAPING, SEE LANDSCAPE DRAWINGS
- PROPERTY LINE
- LIMIT OF WORK
- LINE OF ROOF, SKYLIGHT, OR SOFFIT OVERHEAD - SHOWN DASHED
- FIRE HYDRANT

0 50
Scale (Feet)

Source: BCA, 2020

1. Introduction

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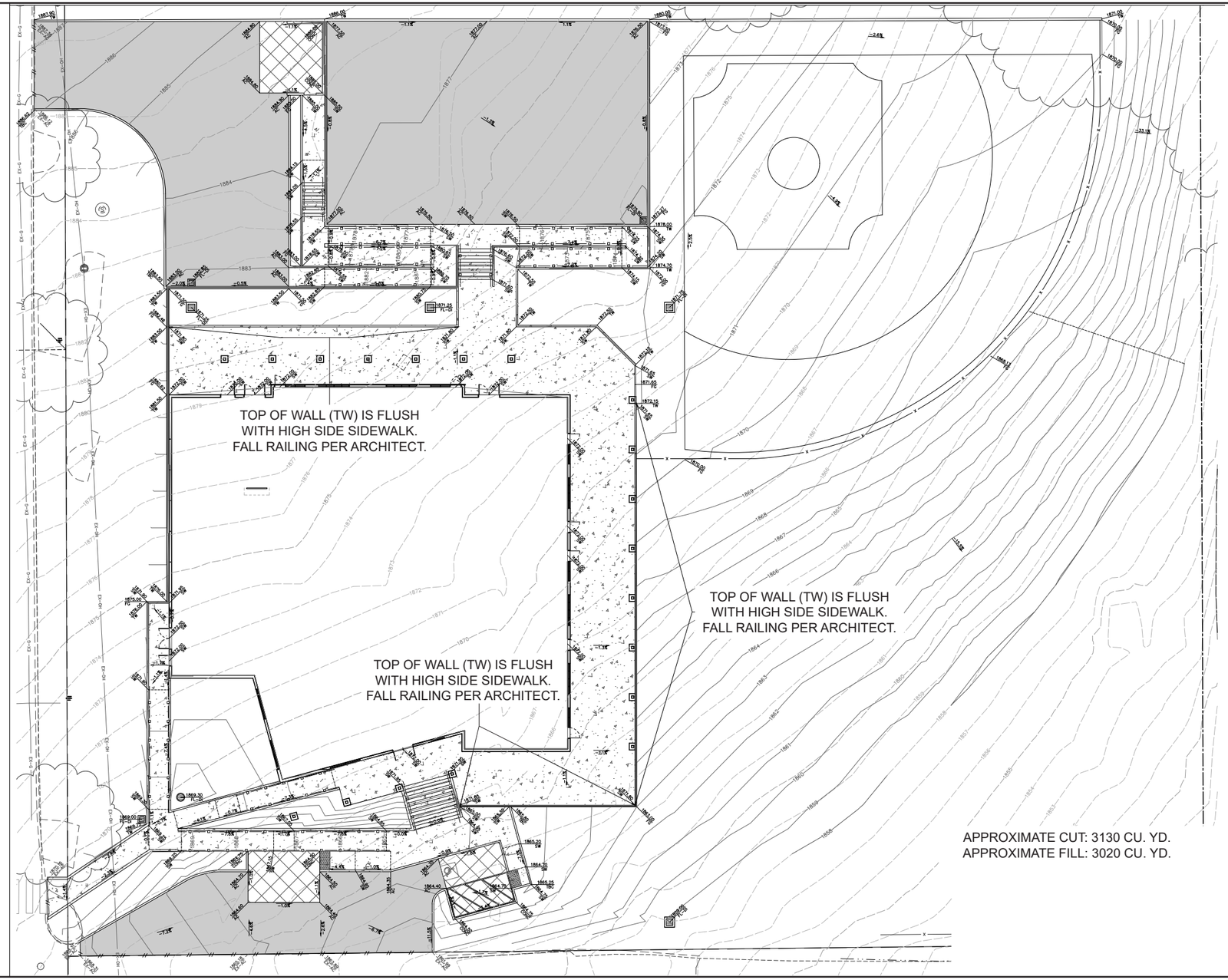
Figure 5 - Overall Site Plan with Topography



0 35
Scale (Feet)

Source: BCA, 2020

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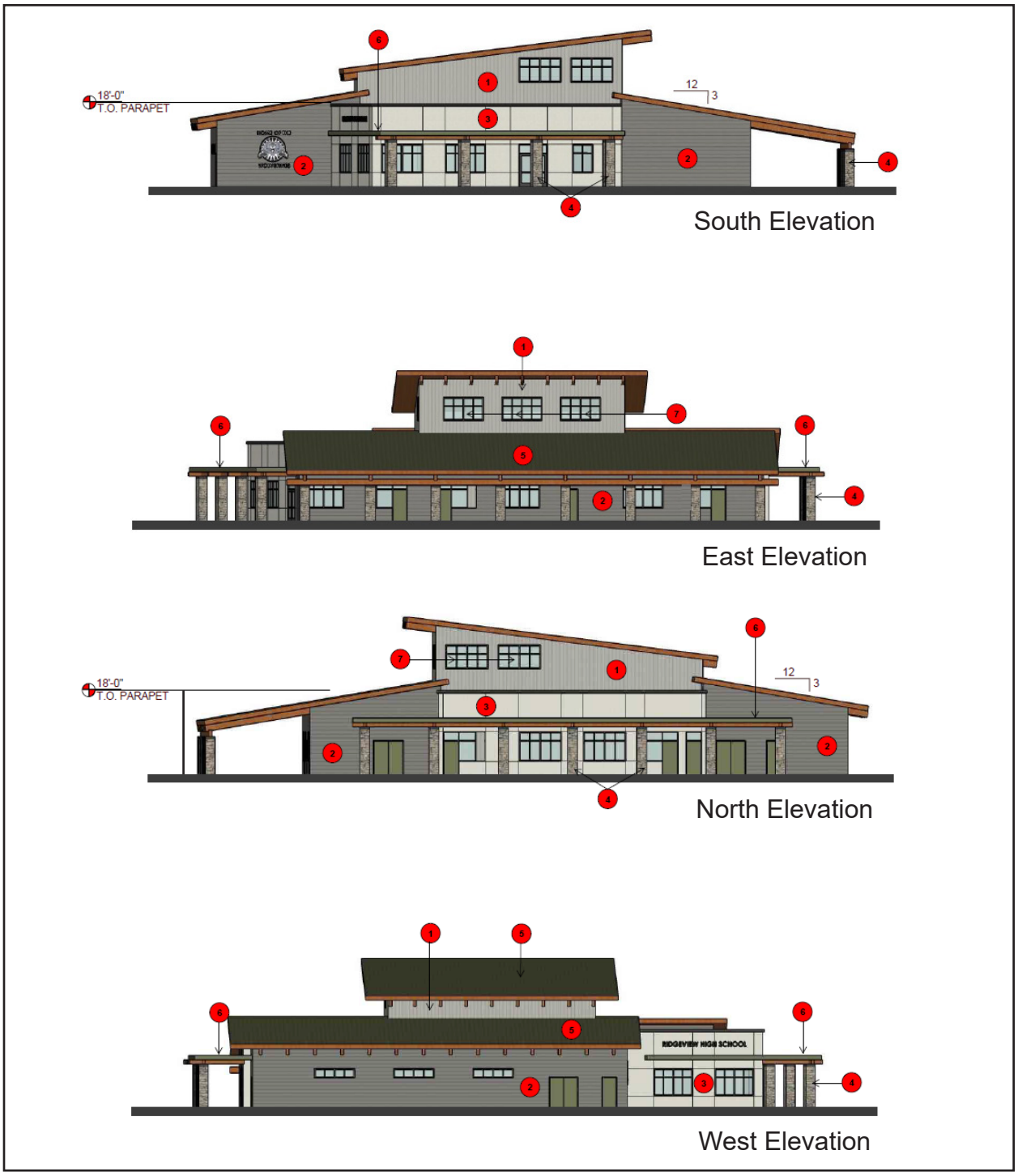
Figure 6 - Ridgeview High School Building Exterior Elevations



1. Vertical Cementious Siding
2. Horizontal Cementious Siding
3. Cement Plaster with Reveals
4. Stone Veneer Column
5. Standing Seam Metal Roof
6. Canopy
7. Clerestory Windows

0 40
Scale (Feet)

1. Introduction

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Offices and rooms for administrative services would be provided near the primary entrance of the building. Classrooms would be located around the multipurpose room. A 485-square foot warming kitchen with access to dry storage would be located at the northwest end of the building. Additional access to the building would be provided via three entrances along the northern side of the building as well as five entrances along the eastern side of the building. Equipment storage would be provided at the northeast side of the building. Further, an enclosure that would accommodate individual trash bins for solid waste, recyclable materials and food waste would be provided along the northwestern site boundary.

Other project features and improvements — such as architectural and landscape design and improvements; recreational amenities and facilities; parking areas; vehicular and pedestrian access and circulation improvements; infrastructure improvements; and school operations — are discussed in detail below.

1.3.3 Landscaping, Retaining Walls, and Lighting

1.3.3.1 LANDSCAPING

As shown in Figure 4, *Overall Site Plan*, the project's landscape plan would feature new landscaping along the site perimeter. Landscaping would also be provided in the parking area, along the internal drive aisles and building edges, and within the campus courtyard. The proposed landscape scheme would include a variety of ornamental trees, shrubs, and groundcover.

1.3.3.2 RETAINING WALLS

Retaining walls would be constructed along the northern perimeter of the site, the western and eastern perimeter of the basketball courts, as well as the western and eastern side of the building. Two adjoining retaining walls along the northern perimeter of the site would be constructed. A ten-foot retaining would extend from the northwestern portion of the site for approximately 145 feet and adjoin a 5-foot retaining that extends an additional 170 feet to the northeastern portion of the site. Two 10-foot retaining walls would be constructed on the western and eastern perimeter of the basketball courts that extend approximately 120 feet each. Retaining walls with varying heights would be constructed adjacent to the proposed building. Along the west-facing side of the building, adjacent to the electrical room, a retaining wall would extend approximately 20 feet. Along the east-facing side of the building, adjacent to the concrete walk, a retaining wall would extend approximately 100 feet.

1.3.3.3 LIGHTING

Light fixtures would be installed inside and around the exterior of the building. However, no lighting would be installed around the basketball court or modified softball field.

1.3.4 Access, Circulation, and Parking

1.3.4.1 VEHICULAR ACCESS AND CIRCULATION

Figure 3 illustrates the path of travel for all modes of travel – vehicular, pedestrian, and bicycle. As shown in Figure 4 vehicular access for the project site would be provided via Maxwell Drive and Pleasant Lane. Parents

and students would use the drop-off loop at Paradise High School (on the west side of Maxwell Drive) or the parking lot south of the project site.

1.3.4.2 PEDESTRIAN ACCESS AND CIRCULATION

As shown in Figure 3, pedestrian access to the project site would be provided via a public sidewalk along the western side of Maxwell Drive, which is adjacent to the project site. An existing bicycle lane extends along the eastern side of Maxwell Drive, adjacent to the project site. There is currently no public sidewalk along the eastern side of Maxwell Drive or along Pleasant Lane. There is an existing crosswalk on Maxwell Drive south of the drop-off loop entrance and north of Pleasant Lane that would provide access from the existing drop-off loop to Ridgeview High School.

1.3.4.3 PARKING

As shown in Figure 4, the main parking area for school staff, personnel, and visitors would be in the existing parking lot, south of Pleasant Lane. This parking area would provide parking spaces for up to 25 vehicles and would include standard and handicap parking spaces.

1.3.5 Utilities

The following utilities would serve Ridgeview High School:

- **Water:** Paradise Irrigation District, Del Oro Water Company
- **Wastewater** is disposed of through a septic system
- **Electricity:** Pacific Gas and Electric Company
- **Natural Gas:** Pacific Gas and Electric Company
- **Solid Waste Collection:** Waste Management, Paradise Solid Waste
- **Cable Television:** Charter Spectrum, AT&T, DIRECTV, Xfinity, Suddenlink

1.3.6 Green Building Standards

Green building is the practice of designing, constructing and operating buildings to maximize occupant health and productivity, use fewer resources, reduce waste and negative environmental impacts, and decrease life cycle costs (USGBC 2019). The project would be designed using green building practices, including those of the most current California Building Energy Efficiency Standards (Title 24, California Code of Regulations, Part 6) and California Green Building Standards Code (CALGreen [Title 24, California Code of Regulations, Part 11]. The Building Energy Efficiency Standards contain energy and water efficiency requirements (and indoor air quality requirements) for newly constructed buildings, additions to existing buildings, and alterations to existing buildings. CALGreen is California's statewide "green" building code. Its purpose is to improve public health, safety and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories: planning and design; energy efficiency; water efficiency and conservation; waterial conservation and resource efficiency; and environmental quality.

As proposed, project develoment would include mandatory standards from Divisions 5.1(Planning and Design), 5.2 (Energy Efficiency), 5.3 (Water Efficiency and Conservation), 5.4 (Material Conservation and Resource Efficiency), and 5.5 (Environmental Quality) of CAlGreen. Some of the specific green building standards include but are not limited to:

- Bicycle parking
- Light pollution reduction
- Water-conserving plumbing fixtures and fittings
- Construction waste reduction, disposal, and recycling
- Recycling by occupants
- Finish material pollutant control

1.3.7 School Operations, Students, and Staffing

1.3.7.1 SCHOOL HOURS AND CALENDAR

Based on the proposed construction timeline (see Section 1.5.9, *Project Phasing and Construction*), it is anticipated that the new campus would be operational for the 2022-2023 school year, which commences in August 2022. Campus hours of operation for Ridgeview High School would be from 8:30 am to 3:22 pm, Monday through Friday during normal school months, which is the second week of August through the first week of June (just over 10 months long). The school has minimum days normally once a week during which time the hours of operation would be 8:30 am to 12:44 pm. The campus would be closed on weekends and holidays, unless a special event is scheduled. During normal school months, there would be at least 13 holidays and faculty in-service days when school is not in session. On these days, the campus traffic is reduced to staff use only. During the holidays, the entire campus would be closed with no activity whatsoever. During the summer months, the school campus would be closed.

1.3.7.2 STUDENTS AND STAFFING

As noted earlier, the project involves the construction of a single-story classroom and administration building and would serve as the District's continuation high school, which is currently located at 13835 West Park Drive, in the town of Magalia, approximately 3.5 miles northeast of the project site. Currently, the high school student population at the campus is approximately 95 students. However, the anticipated enrollment for fall 2022 is approximately 120 students. The student enrollment capacity for the new campus would be for up to 150 high school students in grades 10 through 12. The new campus would have a staff of approximately 10 persons, which would include teachers, administration, and maintenance.

1.3.8 Project Phasing and Construction

Project development is anticipated to be completed in one phase, including the following activities: site preparation, grading and excavation, trenching for site utilities, construction of the new school building, paving, and painting. Overall construction is estimated to take approximately 13.5 months, extending from June 2021 to June 2022. The project would require approximately 3,130 cubic yards (cy) of cut and approximately 3,020

cy of fill. In total, this would result in approximately 110 cy of soil to be exported. The types and numbers of construction equipment expected to be used during construction activities are summarized in Section 3.3, *Air Quality*. Based on the proposed construction timeline, it is anticipated that the new campus would be operational for the 2022-2023 school year, which commences in August 2022.

1.3.9 Discretionary Actions and Approvals

A discretionary action is an action taken by a government agency (for the project, the government agency is the Paradise Unified High School District) that calls for an exercise of judgment in deciding whether to approve a project. The Paradise Unified High School District is the lead agency under CEQA and has the principal approval authority over the project. The MND must be adopted by the Board of Education, confirming its adequacy in complying with the requirements of CEQA. The Board will consider the information in the MND in deciding to approve or deny the proposed project. The analysis is intended to provide environmental review for the whole of the proposed project, including the planning of the project; clearance, excavation, and grading of the site; construction of buildings; installation of the proposed facilities; and ongoing operation.

1.3.10 Non-Discretionary/Ministerial Actions and Approvals

A public agency, other than the lead agency, that has discretionary approval power over a part of the proposed project is known as a "Responsible Agency," as defined by CEQA Guidelines. The Responsible Agencies, and their corresponding approvals for this project, may include the following:

- California Department of Education, School Facilities and Transportation Services Division
- California Department of General Services, Division of the State Architect
  - Approval of site plans and building plans
  - Approval of a Site Plan Review
- Approval and issuance of grading and building permits. Town of Paradise
  - Approvals for water, sewer, and storm drain infrastructure improvements in the public right-of-way.
  - Approval of any roadway improvements and closures needed to implement the improvements.

1.4 EXISTING ZONING AND GENERAL PLAN

The prevailing adopted planning and regulatory documents that govern development and use of the project site are the Town of Paradise General Plan and Zoning Code (Title 17 of the Paradise Municipal Code). The Town of Paradise General Plan land use designation of the project site is Public Institutional (P-I). The project site is zoned Community Facilities (C-F). The development and design standards and regulations contained in the Paradise Zoning Code, which implements the Town of Paradise General Plan, constitute the zoning regulations that govern development of the project site. As proposed, the continuation school is permitted under the Public Institutional land use designation and Community Facilities zoning district via Town approval and issuance of a site plan review.

2. Environmental Checklist

2.1 PROJECT INFORMATION

1. Project Title: Ridgeview High School Project

2. Lead Agency Name and Address:
Paradise Unified School District
6696 Clark Road.
Paradise, California 95969

3. Contact Person and Phone Number:
David McCready, Assistant Superintendent, Business Services
530.872.6400

4. Project Location:
The project site encompasses APNs: 053-110-065-000, 053-110-064-000, 053-110-010-000, 053-110-009-000, and is located at 5944 Maxwell Drive, in Paradise, California.

5. Project Sponsor's Name and Address:
Paradise Unified School District
6696 Clark Road.
Paradise, California 95969

6. General Plan Designation:
Public Institutional (P-I).

7. Zoning:
Community Facilities (C-F).

8. Description of Project:
The proposed project involves the construction of a single-story classroom and administration building, modified softball field, and one basketball court. Additionally, the proposed project would develop install one new parking space, bring the total to 25 parking spaces. Ridgeview High School would serve as the District's continuation high school and would serve up to approximately 150 students. The high school campus would serve students in grades ten through twelve.

The new campus would feature a building for classrooms and administrative services. The single-story classroom and administration building would total approximately 11,355 square feet and provide six classrooms.

2. Environmental Checklist

Architecturally and functionally, the rectangular-shaped building would be designed and constructed as a single-story building (with heights ranging from 18 to 27 feet) that would connect pedestrians with a covered concrete walkway, stairs, and ramp. The building would house the proposed classrooms, a multipurpose room, and administration offices. Primary entrance to the main building would be from the southern end of the building, which faces Pleasant Lane.

Offices and rooms for administrative services would be provided near the primary entrance of the building. Classrooms would be located around the multipurpose room. A 485-square foot warming kitchen with access to a dry storage area would be located at the northwest end of the building. Additional access to the building would be provided via three entrances along the northern side of the building as well as five entrances along the eastern side of the building.

9. Surrounding Land Uses and Setting:

To the north and abutting the project site is vacant land with single-family residences beyond; to the south, across Pleasant Lane is vacant land with single-family residences beyond; to the east and abutting the project site is vacant land with commercial uses beyond; and to the west, across Maxwell Drive is Paradise High School with vacant land and commercial uses beyond.

10. Other Public Agencies Whose Approval Is Required (e.g., permits, financing approval, or participating agreement):

California Department of General Services, Division of the State Architect

- Structural
- Fire Life Safety
- American with Disabilities Act (ADA)
- Model Water Efficient Landscape Ordinance (MWELO)

California Department of Education

- Site Approval
- Plan Approval

California Department of Toxic Substances Control

- Site Approval, No Further Action

Town of Paradise

- Approvals for water, sewer, and storm drain infrastructure improvements in the public right-of-way.
- Approval of any roadway improvements and closures needed to implement the improvements.

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

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 Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3(c) contains provisions specific to confidentiality.

The Torres Martinez Desert Cahuilla Indians and the Gabrieleño Band of Mission Indians–Kizh Nation are on the District's notification list pursuant to AB 52. As of the time of the publication of this Mitigated Negative Declaration, neither the Torres Martinez Desert Cahuilla Indians, nor the Gabrieleño Band of Mission Indians–Kizh Nation have contacted the District, and as such, no consultation has been in initiated.

2. Environmental Checklist

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

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

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 *Date*

2.4 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 would 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.

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 Analyses Used.** Identify and state where they are available for review.

   b) I**mpacts 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 Mitigation Measures Incorporated," 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.

2. Environmental Checklist

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 significance.

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
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?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	
II. AGRICULTURE AND FORESTRY RESOURCES. In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the 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 non-agricultural use?				X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
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))?				X
d) Result in the loss of forest land or conversion of forest land to non-forest use?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X
III. AIR QUALITY. 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?			X	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c) Expose sensitive receptors to substantial pollutant concentrations?			X	
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	
IV. BIOLOGICAL RESOURCES. 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 Wildlife or U.S. Fish and Wildlife Service?		X		
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
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?				X
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?		X		
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				X
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?				X
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?			X	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. ENERGY. 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?			X	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				X
VII. GEOLOGY AND SOILS. 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.			X	
ii) Strong seismic ground shaking?			X	
iii) Seismic-related ground failure, including liquefaction?			X	
iv) Landslides?			X	
b) Result in substantial soil erosion or the loss of topsoil?			X	
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?			X	
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?			X	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?				X
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				X
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X	
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?			X	

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X	
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment?				X
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?				X
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X	
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?			X	
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?		X		
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
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			X	
iv) impede or redirect flood flows?				
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?				X
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?			X	
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
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?				X

2. Environmental Checklist

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				X
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?				X
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				X
XIV. POPULATION AND HOUSING. 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)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X
XV. PUBLIC SERVICES. 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:				
Fire protection?			X	
Police protection?			X	
Schools?				X
Parks?				X
Other public facilities?				X
XVI. RECREATION.				
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?				X

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?				X
XVII. TRANSPORTATION. Would the project:				
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?			X	
b) Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b)?			X	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				X
d) Result in inadequate emergency access?			X	
XVIII. TRIBAL CULTURAL RESOURCES.				
a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code § 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
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			X	
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	

2. Environmental Checklist

	Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
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?			X	
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			X	
XX. WILDFIRE.	**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?			X	
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?			X	
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?			X	
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?			X	
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.					
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?		X		
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.)			X	
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?			X	

2. Environmental Checklist

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3. Environmental Analysis

Section 2.4 provided a checklist of environmental impacts. This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable.

3.1 AESTHETICS

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

a) Have a substantial adverse effect on a scenic vista?

Less Than Significant Impact. For purposes of determining significance under CEQA, a scenic vista is generally considered a viewpoint that provides expansive views of a highly-valued landscape for the benefit of the general public. Some scenic vistas are officially designated by public agencies, or informally designated by tourist guides. Vistas provide visual access or panoramic views to a large geographic area and are generally located at a point where surrounding views are greater than one mile away. Panoramic views are usually associated with vantage points over a section of urban or natural areas that provide a geographic orientation not commonly available. Examples of panoramic views might include an urban skyline, valley, mountain range, large open space area, the ocean, or other water bodies. A substantial adverse effect to a scenic vista is one that degrades the view from such a designated view spot.

The Town of Paradise General Plan has established gateway areas and scenic corridors to preserve the scenic vistas. The project site is not located within a gateway area or along scenic corridors (Paradise 1994). The Town of Paradise is located in the western foothills of Sierra Nevada Mountains and is characterized by intervening ridges and valleys sloping to the southwest. The project site is relatively flat with a mild slope across the site that extends downward to the southeast. Views from the project site and these scenic areas are limited and obstructed by the surrounding environment. Therefore, impacts to scenic vistas would be less than significant and no mitigation measures are necessary.

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

No Impact. A scenic highway is generally considered a stretch of public roadway that is designated as a scenic corridor by a federal, state, or local agency. California Department of Transportation (Caltrans) defines a scenic highway as any freeway, highway, road, or other public right-of-way, that traverses an area of exceptional scenic quality.

According to the California Scenic Highway Mapping System, the closest eligible state scenic highway is State Route 70, approximately 5.24 miles to the southeast (Caltrans 2020). The new school would not be visible from nearest state-designated scenic highway (State Route 49), approximately 40 miles to the southeast. Furthermore, there are no rock outcroppings or historic buildings onsite—the project site is vacant and void of any buildings

and structures. Therefore, no impact to scenic resources within a state scenic highway would occur due to project development and no mitigation measures are necessary.

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 in a nonurbanized area and is surrounded by residential, commercial, and public institutional development and vacant land.[1]

Grading and construction activities associated with the proposed project have the potential to cause temporary degradation of local aesthetics for residents living close to the new school site. However, such activities are temporary and would cease with completion of the proposed project. These activities would be typical of any site in the Town that undergoes development or redevelopment. Due to the short-term, temporary nature of construction activities and the non-altering effect on the surrounding neighborhood character, impacts would be less than significant.

Completion of the proposed project would be compatible with surrounding uses. The proposed building would be similar in height and character to the buildings at adjacent high school. Overall, Project development would enhance and strengthen the visual character of the project site and its surroundings through new architecture, landscaping, hardscape, and other improvements onsite and along the project site's street frontages. The proposed architectural and landscape elements and design would ensure that development of the Project is not detrimental to the visual character or quality of the surrounding area or uses. The building masses, landscaping, and various hardscape and landscape improvements proposed throughout the project site would be designed to create a sense of cohesiveness on and offsite and along the project site boundaries. Although newer than that of the surrounding area and uses, the proposed buildings, landscaping and site improvements would complement and not detract from the visual character of the site or surrounding area. Therefore, Project development would not substantially degrade the visual character or quality of the site and its surroundings. Impacts would be less than significant, and no mitigation measures are necessary.

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 two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the area intended to be lit. Glare occurs when a bright object appears against a dark background, such as oncoming vehicle headlights or an unshielded light bulb.

As shown in Figure 3, *Aerial Photograph*, the project site (which consists of vacant land and an existing parking lot) is surrounded by a mix of residential, commercial, and public institutional development and vacant land.

[1] PRC § 21071/CEQA Guidelines § 15191(m)(1). For an incorporated city, "urbanized area" means a city that either by itself or in combination with two contiguous incorporated cities has a population of at least 100,000 persons. The Town of Paradise had a population of less than 100,000 persons.

Residential uses are considered light-sensitive receptors, which are land uses that are sensitive to lighting. No sources of light or glare exist on the project site.

The project vicinity has streetlights, vehicle lights, parking lot lights, and building and security lights from the adjacent high school. The new campus would have light fixtures installed inside and around the exterior of the building and parking lot. The project would not include any high-intensity lighting such as those used for athletic fields or nighttime sports activity. Security and path lights would be directional and would not spill light to nearby residential properties. All lights would also be shielded to avoid light spill and glare onto adjacent properties. Lighting would not be substantially greater intensities than existing lights near the project site, and nighttime views would not be significantly affected. Therefore, light and glare impacts would be less than significant, and no mitigation measures are necessary.

3.2 AGRICULTURE AND FORESTRY RESOURCES

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

No Impact. The project site is designated as Urban and Built-up land on the California Important Farmland Finder (DLRP 2016). As the proposed project would not result in the conversion of Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, no impact would occur.

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project site is zoned T-R 1/2 (Town Residential) and C-F (Community Facilities) and is not zoned for agricultural use (Paradise 2020b). The project site is located on land not enrolled in a Williamson Act contract (Butte County 2015). No impact would occur.

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 developed and is zoned T-R 1/2 and C-F. Project implementation would not cause rezoning of forestland or timberland. Therefore, no impact would occur.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. The project site does not contain forestland, nor is the project site zoned as forestland. The project site is developed, and implementation of the proposed project would not convert forestland to non-forest use or result in a loss of forestland. Therefore, no impact would occur.

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

No Impact. As shown in Figure 3, *Aerial Photograph*, the project site is not adjacent to agricultural uses. Improvements proposed with the project would result in one new single-story building, a parking lot, baseball field, and two basketball courts. The T-R 1/2 and C-F Zone Districts are not considered agricultural zones. As there is no potential to convert farmland to non-farm uses, no impact would occur.

3.3 AIR QUALITY

The analysis in the section is based partly on the following technical studies which is included as Appendix A to this Initial Study.

- *Air Quality & Greenhouse Gas Assessment Ridgeview High School Project*, ECORP Consulting, Inc, 2021, January.

A background discussion on the air quality regulatory setting, meteorological conditions, existing ambient air quality in the vicinity of the project site, and air quality modeling can be found in Appendix A.

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?

Less Than Significant Impact. As part of its enforcement responsibilities, the United States Environmental Protection Agency requires each state with nonattainment areas to prepare and submit a State Implementation Plan (SIP) that demonstrates the means to attain the federal standards. The SIP must integrate federal, state, and local plan components and regulations to identify specific measures to reduce pollution in nonattainment areas, using a combination of performance standards and market-based programs. Similarly, under state law, the California Clean Air Act (CCAA) requires an air quality attainment plan to be prepared for areas designated as nonattainment with regard to the federal and state ambient air quality standards. Air quality attainment plans outline emissions limits and control measures to achieve and maintain these standards by the earliest practical date.

The 2018 Air Quality Attainment Plan constitutes the current SIP for the Butte County portion of the Northern Sacramento Valley Air Basin (NSVAB) and is the most recent air quality planning document covering Butte County. The project site is located within the NSVAB. Air quality attainment plans are a compilation of new and previously submitted plans, programs (such as monitoring, modeling, permitting, etc.), district rules, state regulations, and federal controls describing how the state will attain ambient air quality standards. The

3. Environmental Analysis

2018 Air Quality Attainment Plan includes forecast ROG and NO_X emissions (O_3 precursors) for the entire NSVAB through the year 2020. The plan also includes control strategies necessary to attain the California O_3 standard at the earliest practicable date, as well as developed emissions inventories and associated emissions projections for the region showing a downtrend for both ROG and NO_X.

The consistency of the project with the 2018 Air Quality Attainment Plan is determined by Project-induced development's consistency with air pollutant emission projections in the plan. The 2018 Air Quality Attainment Plan is based on information derived from projected growth in Butte County to project future emissions and then determine strategies and regulatory controls for the reduction of emissions. Growth projections are based on the general plans developed by Butte County and the incorporated cities in the county, including the Town of Paradise. As such, projects that propose development consistent with the growth anticipated by the respective general plan and zoning classification of the jurisdiction in which the proposed development is located would be consistent with the 2018 Air Quality Attainment Plan. If a project would propose a development that is less dense than that associated with the general plan and zoning code, the project would likewise be consistent with the Air Quality Attainment Plan. If a project, however, proposes a development that is denser than that assumed in the general plan and zoning code, the project may conflict with the Air Quality Attainment Plan and could therefore result in a significant impact on air quality.

Implementation of the proposed project would result in a new high school. As previously stated, the new school would not result in new students or trips within the school district but would instead shift existing trips to the project site. Thus, it would not be a substantial source of new air pollutant emissions. Furthermore, the project site has a Town of Paradise zoning classification of C-F. The C-F zone is intended for land areas that are planned to or already provide for public and public institutional land uses, such as public schools. The project's proposed uses would be consistent with this land use classification and therefore would not exceed the population or job growth projections used by the BCAQMD to develop the 2018 Air Quality Attainment Plan. Thus, the proposed project would be consistent with the BCAQMD's emission reduction goals and air quality planning and would not conflict with or obstruct implementation of the applicable air quality plan. Impacts would be less than significant, and no mitigation measures are necessary.

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

Regional Short-Term Construction Impacts

Construction-generated emissions are temporary and short-term but have the potential to represent a significant air quality impact. Three basic sources of short-term emissions will be generated through construction of the proposed Project: operation of the construction vehicles (i.e., tractors, forklifts, pavers), the creation of fugitive dust during clearing and grading, and the use of asphalt or other oil-based substances during paving activities.

Construction-generated emissions associated the proposed Project were calculated using the were estimated using the California Emissions Estimator Model (CalEEMod), version 2016.3.2.25, which is designed to model emissions for land use development projects, based on typical construction requirements. Predicted maximum daily construction-generated emissions for the proposed project are summarized in Table 1, *Construction-Related Emissions*. As shown in the table below, emissions generated during project construction would not exceed the BCAQMD's thresholds of significance. Therefore, criteria pollutant emissions generated during project construction would not 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, and impacts would be less than significant.

Table 1 Construction-Related Emissions

Construction Year	ROG	NO_x	PM_{10}
Pounds per Day			
2021	7.94	20.25	7.56
2022	2.02	15.83	1.01
BCAQMD Daily Significance Threshold	137	137	82
Exceed BCAQMD Daily Threshold?	**No**	**No**	**No**
Tons Per Year			
2021	0.21	1.4	0.11
2022	0.07	0.59	0.03
BCAQMD Annual Significance Threshold	4.5	4.5	N/A
Exceed BCAQMD Annual Threshold?	**No**	**No**	**No**

Source: ECORP 2021

Long-Term Operation Impacts

Implementation of the proposed project would result in long-term operational emissions of criteria air pollutants such as PM_{10} and O_3 precursors such as ROG and NO_X. Operational-generated emissions associated with the proposed project were calculated using CalEEMod. Predicted maximum annual operational-generated emissions of criteria air pollutants for the proposed project are summarized in Table 2, *Operational-Related Emissions*. As shown in the table below, daily emissions associated with project operations would not exceed the BCAQMD significance thresholds. Therefore, criteria pollutant emissions generated during project operation would not 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. Impacts would be less than significant, and no mitigation measures are necessary.

Table 2 Operation-Related Emissions

Emission Source	ROG	NO_x	PM_{10}
Summer Emissions			
Area	0.07	0.00	0.00
Energy	0.00	0.01	0.00

3. Environmental Analysis

Table 2 Operation-Related Emissions

Emission Source	ROG	NO_x	PM_{10}
Mobile	0.95	5.77	2.01
Total	1.02	5.78	2.01
BCAQMD Significance Threshold	25	25	80
Exceed BCAQMD Threshold?	**No**	**No**	**No**
Winter Emissions			
Area	0.07	0.00	0.00
Energy	0.00	0.01	0.00
Mobile	0.73	6.04	2.01
Total	0.80	6.05	2.01
BCAQMD Significance Threshold	25	25	25
Exceed BCAQMD Threshold?	**No**	**No**	**No**

Source: ECORP 2021
Notes: Emission projections are predominately based on CalEEMod model defaults for Butte County. Mobile source emission data used in CalEEMod is based on estimated traffic trip generation rates identified by Headway Transportation (2020).

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. Sensitive receptors are defined as facilities or land uses that include members of the population that are particularly sensitive to the effects of air pollutants, such as children, the elderly, and people with illnesses. Examples of these sensitive receptors are residences, schools, hospitals, and daycare centers. The nearest sensitive land uses to the project site includes Paradise High School, located across Maxwell Drive to the west.

Construction-Generated Air Contaminants

Construction-related activities would result in temporary, short-term project-generated emissions of DPM, ROG, NOx, PM_{10} and $PM_{2.5}$ from the exhaust of off-road, heavy-duty diesel equipment for site preparation (e.g., clearing, grading); soil hauling truck traffic; paving; and other miscellaneous activities. The portion of the NSVAB that encompasses the project area is designated as a nonattainment area for federal O_3 and standards and is also a nonattainment area for the state standards for O_3, PM_{10}, and $PM_{2.5}$ (ECORP 2021). Thus, existing O_3, PM_{10}, and $PM_{2.5}$ levels in the Butte County portion of the NSVAB are at unhealthy levels during certain periods. However, as shown in Table 1, the proposed project would not exceed the BCAQMD significance thresholds for emissions.

The health effects associated with O_3 are generally associated with reduced lung function. Because the proposed project would not involve construction activities that would result in O_3 precursor emissions (ROG or NOx) in excess of the BCAQMD thresholds, the proposed project is not anticipated to substantially contribute to regional O_3 concentrations and the associated health impacts.

CO tends to be a localized impact associated with congested intersections. In terms of adverse health effects, CO competes with oxygen, often replacing it in the blood, reducing the blood's ability to transport oxygen to vital organs. The results of excess CO exposure can include dizziness, fatigue, and impairment of central nervous system functions. The proposed project would not involve construction activities that would result in

CO emissions in excess of any significance thresholds. Thus, the proposed project's CO emissions would not contribute to the health effects associated with this pollutant.

Particulate matter (PM_{10} and $PM_{2.5}$) contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. For construction activity, diesel particulate matter is the toxic air contaminant of concern. Based on the emission modeling conducted, the maximum onsite construction-related daily emissions of exhaust $PM_{2.5}$, considered a surrogate for diesel particulate matter, would be 0.84 pounds per day during construction (ECORP 2021). As with O_3 and NOx, the proposed project would not generate emissions of PM_{10} or $PM_{2.5}$ that would exceed thresholds. Accordingly, the proposed project's PM_{10} and $PM_{2.5}$ emissions are not expected to cause any increase in related regional health effects for these pollutants.

Based on the preceding, the project construction would not result in a potentially significant contribution to regional concentrations of nonattainment pollutants and would not result in a significant contribution to the adverse health impacts associated with those pollutants. Impacts would be less than significant, and no mitigation measures are necessary.

Operational Air Contaminants

Operation of the proposed project would not result in the development of any substantial sources of air toxics. There are no stationary sources associated with the operations of the proposed project; nor would the proposed project attract additional heavy-duty trucks that spend long periods queuing and idling at the site. Onsite project emissions would not result in significant concentrations of pollutants at nearby sensitive receptors. The maximum operation-related emissions of exhaust $PM_{2.5}$, considered a surrogate for diesel particulate matter, would be 0.02 pounds per day. Most of these emissions would be generated offsite. Therefore, the proposed project would not be a source of toxic air contaminant and there would be no impact as a result of the proposed project during operations. The proposed project would not have a high carcinogenic or non-carcinogenic risk during operation.

Carbon Monoxide Hot Spots

It has long been recognized that CO exceedances are caused by vehicular emissions, primarily when idling at intersections. Previous analysis had shown that intersections with a traffic volume of 100,000 vehicles per day did not violate CO standards. The proposed project is anticipated to generate approximately 304 average daily trips. Additionally, the new school would not result in new students or trips within the school district but would instead shift existing trips to the proposed new location. The proposed project would not increase traffic volumes at any intersection to more than 100,000 vehicles per day. Therefore, there is no likelihood of the project traffic exceeding CO values.

Based on the preceding, the proposed project would not expose sensitive receptors to substantial pollutant concentrations. Impacts would be less than significant, and no mitigation measures are necessary.

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

Less Than Significant Impact.

Construction

During construction, the proposed project presents the potential for generation of objectionable odors in the form of diesel exhaust in the immediate vicinity of the project site. However, these emissions are short-term in nature and will rapidly dissipate and be diluted by the atmosphere downwind of the emission sources. Additionally, odors would be localized and generally confined to the construction area. Therefore, construction odors would not adversely affect a substantial number of people to odor emissions. Impacts would be less than significant and no mitigation measures are necessary.

Operation

Land uses commonly considered to be potential sources of obnoxious odorous emissions include agriculture (farming and livestock), wastewater treatment plants, food processing plants, chemical plants, composting facilities, refineries, landfills, dairies, and fiberglass molding. The proposed Project does not include any uses considered to be associated with odors. Therefore, operational odors would not adversely affect a substantial number of people to odor emissions. No impact would occur during operation and no mitigation measures are necessary.

3.4 BIOLOGICAL RESOURCES

The analysis in the section is based partly on the following technical studies which is included as Appendix B to this Initial Study.

- *Biological Resources Assessment New Ridgeview High School Project*, ECORP Consulting, Inc, 2020, August.

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 Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact With Mitigation Incorporated. Candidate species are plants and animals that have been studied and the US Fish and Wildlife Service (USFWS) has concluded that they should be proposed for addition to the federal endangered and threatened species list.

Sensitive biological resources are habitats[2] or individual species that have special recognition by federal, state, or local conservation agencies and organizations as endangered, threatened, or rare. The California Department

[2] Per the California Department of Fish and Wildlife, habitat is where a given plant or animal species meets its requirements for food, cover, and water in both space and time.

of Fish and Wildlife (CDFW), USFWS, and organizations like the California Native Plant Society maintain watch lists of such resources.

Special status species is a universal term used in the scientific community for species that are considered sufficiently rare that they require special consideration and/or protection and should be, or have been, listed as rare, threatened, or endangered by USFWS and/or CDFW.

Candidate and Sensitive Species

No candidate or sensitive species occur onsite, and no such species were observed during a reconnaissance of the project site on July 16, 2020. Therefore, no impact would occur and no mitigation measures are necessary.

Special Status Species

There are no special-status species previously documented within the project site boundaries, however several special-status species are known to occur within an approximate five-mile radius. Based upon the vegetation community and habitats present onsite, there are several potentially occurring special-status species for the project site.

Special Status Plants

The project site supports potentially suitable habitat for special-status plants including Jepson's onion, True's manzanita, Carlotta Hall's lace fern, depauperate milk-vetch, Sierra foothills brodiaea, thread-leaved beakseed, Butte County calycadenia, golden-anthered clarkia, Northern Sierra daisy, Ahart's buckwheat, Butte County fritillary, Humboldt lily, Sierra blue grass, Hall's rupertia, Butte County checkerbloom, and long-fruit Jewelflower. While no special-status species were previously documented within the project site boundaries, there are several potentially occurring special-status species for the project site based upon the vegetation community and habitats present onsite.

Tree or vegetation removal may be required for the project; therefore, the project could result in direct impacts on special-status plants during construction. Therefore, per mitigation measure BIO-1, pre-construction focused plant surveys shall be conducted according to USFWS, CDFW, and CNPS protocols. Additionally, per mitigation measure BIO-2, seed collection, transplantation, and/or other mitigation measures may be developed in consultation with appropriate resource agencies to reduce impacts to special-status plant populations if special status plant species are found during surveys. Therefore, impacts would be less than significant with implementation of mitigation.

Special Status Wildlife

The few scattered black oak trees remaining on the site support potentially suitable nesting habitat for two special-status birds, Nuttall's woodpecker (*Dryobates nuttallii*) and oak titmouse (*Baeolophus inornatus*).

The undeveloped portions of the project site are made up disturbed (burned) pine-oak woodland; much of this community, including the project site, were completely burned during the Camp Fire in November 2018. However, tree or vegetation removal may be required for the project; therefore, the project could result in direct impacts on special-status birds if they are nesting in the affected trees and vegetation during construction.

3. Environmental Analysis

Indirect impacts on special-status birds could result from noise and vibration during construction if birds were nesting in the trees adjacent to the project area. Therefore, per mitigation measure BIO-3, a preconstruction nesting bird survey is required within 14 days of the commencement ground disturbance during the nesting season. Additionally, per mitigation measure BIO-4, a no disturbance buffer around the nest shall be established if active nests are found. Therefore, impacts would be less than significant with implementation of mitigation.

Mitigation Measures

BIO-1 Prior to construction, perform focused plant surveys according to USFWS, CDFW, and CNPS protocols. Surveys should be timed according to the blooming period for target species and known reference populations, if available, and/or local herbaria should be visited prior to surveys to confirm the appropriate phenological state of the target species.

BIO-2 If special-status plant species are found during surveys within the project site and avoidance of the species is not possible, seed collection, transplantation, and/or other mitigation measures may be developed in consultation with appropriate resource agencies to reduce impacts to special-status plant populations.

BIO-3 Conduct a pre-construction nesting raptor and bird survey of all suitable habitat on the project site within 14 days of the commencement ground disturbance (e.g., tree/vegetation removal, mass grading) during the nesting season (February 1 – August 31). Where accessible, surveys should be conducted within 300 feet of the project site for nesting raptors, and 100 feet of the project site for other nesting birds.

BIO-4 If active nests are found, a no-disturbance buffer around the nest shall be established. The buffer distance shall be established by a qualified biologist, in consultation with CDFW. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest tree, to be determined by a qualified biologist. Once the young are independent of the nest, no further measures are necessary.

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

No Impact. Sensitive natural communities are communities that are considered rare in the region by regulatory agencies; known to provide habitat for sensitive animal or plant species; or known to be important wildlife corridors. Riparian habitats are those occurring along the banks of rivers and streams.

No riparian habitat or other sensitive natural communities were identified onsite by the Biological Resources Assessment. No impact would occur, and no mitigation measures are necessary.

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. Wetlands are defined under the federal Clean Water Act as land that is flooded or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that normally does support, a prevalence of vegetation adapted to life in saturated soils. Wetlands include areas such as streams, swamps, marshes, and bogs.

No wetlands potentially jurisdictional to the US Army Corps of Engineers pursuant to the Clean Water Act were identified onsite during the Biological Resources Assessment. No impact would occur, and no mitigation measures are necessary.

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?

Less Than Significant With Mitigation Incorporated. Wildlife corridors refer to established migration routes commonly used by resident and migratory species for passage from one geographic location to another. Movement corridors may provide favorable locations for wildlife to travel between different habitat areas, such as foraging sites, breeding sites, cover areas, and preferred summer and winter range locations. They may also function as dispersal corridors allowing animals to move between various locations within their range.

The Migratory Bird Treaty Act (MBTA) (50 Code of Federal Regulations (CFR) Part 10 and Part 21) protects migratory birds, their occupied nests, and their eggs from disturbance or destruction. "Migratory birds" include all nongame, wild birds found in the U.S., except for the house sparrow (*Passer domesticus*), European starling (*Sturnus vulgaris*), and rock pigeon (*Columba livia*).

There are no signification habitat features (e.g., wetlands, woodlands) within or adjacent to the project site and project development is not expected to impact wildlife movement. However, scattered saplings trees and low shrubs onsite could provide suitable nesting habitat for birds protected under the Migratory Bird Treaty Act.

The undeveloped portions of the project site are made up of disturbed (burned) pine-oak woodland; much of this community, including the project site, were completely burned during the Camp Fire in November 2018. However, tree or vegetation removal may be required for the project; therefore, the project could result in direct impacts on migratory birds if they are nesting in the affected trees and vegetation during construction. Indirect impacts on migratory birds could result from noise and vibration during construction if birds were nesting in the trees adjacent to the project area. Therefore, per mitigation measure BIO-3, a pre-construction nesting bird survey is required within 14 days of the commencement ground disturbance during the nesting season. Additionally, per mitigation measure BIO-4, a no disturbance buffer around the nest shall be established if active nests are found. Therefore, impacts would be less than significant with implementation of mitigation.

Mitigation Measures

BIO-3 Conduct a pre-construction nesting raptor and bird survey of all suitable habitat on the project site within 14 days of the commencement ground disturbance (e.g., tree/vegetation removal, mass grading) during the nesting season (February 1 – August 31). Where accessible, surveys should be conducted within 300 feet of the project site for nesting raptors, and 100 feet of the project site for other nesting birds.

BIO-4 If active nests are found, a no-disturbance buffer around the nest shall be established. The buffer distance shall be established by a qualified biologist, in consultation with CDFW. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest tree, to be determined by a qualified biologist. Once the young are independent of the nest, no further measures are necessary.

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

No Impact. The Town of Paradise does not have any established ordinances protecting biological resources. Therefore, no impact would occur, and no mitigation measures are necessary.

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. There are no adopted habitat conservation plans, natural community conservation plans, or fother approved local, regional, or state habitat conservation plans that govern the project site (CDFW 2019). No impact would occur.

3.5 CULTURAL RESOURCES

The analysis in the section is based partly on the following technical studies which is included as Appendix C to this Initial Study.

- *Cultural Resources Inventory New Ridgeview High School Project*, ECORP Consulting, Inc, 2020, August.

One attachment of this technical studies is withheld due to containing confidential information. A complete copy of this report is available to qualified archaeologists at the Paradise Unified School District's Assistant Superintendent of Business Services Department office.

Would the project:

a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?

Less Than Significant Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources,

or the lead agency. Generally, a resource is considered "historically significant" if it meets one of the following criteria:

i) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage;

ii) Is associated with the lives of persons important in our past;

iii) Embodies the distinctive characteristics of a type, period, region or method of construction, or represents the work of an important creative individual, or possesses high artistic values;

iv) Has yielded, or may be likely to yield, information important in prehistory or history.

As shown in Figure 3, *Aerial Photograph*, the project site is located on land that has been partially developed as a parking lot and undeveloped rural lands. As previously noted, the Camp Fire burned through this community in November 2018, including the project site.

Project development would involve construction of a new high school facility, totaling 17,000 square feet, including six classrooms, and an administration building. The site does not contain any buildings that would be considered historic. Furthermore, the project site does not meet any of the state or federal criteria of a historic resource identified above. No historical events have occurred on site and no persons of significance have resided or currently reside on site. Additionally, the site does not exhibit any unique architectural style or features. The site does not include architectural elements or features to suggest unique design or construction.

An archaeological records search of the project site and a 0.5-mile radius surrounding the site did not identify previously recorded resources onsite. Historic aerial photographs and topographic maps show the Project site as vacant since 1867. No historic or archaeological sites or resources were identified during a field survey of the project site. No significant historical resources were identified onsite during the cultural resources inventory and impacts to cultural resources would be less than significant. No mitigation measures are necessary.

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

Less Than Significant Impact With Mitigation Incorporated. Archaeological resources are prehistoric or historic evidence of past human activities, including structural ruins and buried resources. As shown in Figure 3, *Aerial Photograph*, the project site has been partially developed as a parking lot and undeveloped rural lands. The surrounding lands include the Paradise High School campus and Maxwell Drive on the west, a parking lot to the south, and residential lots to the north and east.

Due to the presence of alluvium along the Clear and Honey Run creeks, located 0.5 mile east and west of the project site, and given the likelihood of pre-contact archaeological sites located along perennial waterways, there exists the potential for buried pre-contact archaeological sites within the project site. Project construction would disturb large amounts of soil and could damage archaeological resources that may be buried in site soils.

3. Environmental Analysis

In the event that prehistoric and/or historic archaeological resources are discovered during ground-disturbing activities, mitigation measure CUL-1 has been identified to ensure impacts to archaeological resources would be less than significant.

CUL-1 Prior to ground disturbance by project site clearance and grading, the District shall retain a qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeologist, to be on-call during all project ground disturbance activities.

If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for precontact and historic archaeologist, shall be retained to evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately, and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, he or she shall immediately notify the CEQA lead agency, and applicable landowner. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures if the find is determined to be eligible for inclusion in the NRHP or CRHR. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the site either: 1) is not eligible for the NRHP or CRHR; or 2) that the treatment measures have been completed to their satisfaction.
- If the find includes human remains, or remains that are potentially human, he or she shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist shall notify the Los Angeles County Coroner (as per § 7050.5 of the Health and Safety Code). The provisions of § 7050.5 of the California Health and Safety Code, § 5097.98 of the California PRC, and AB 2641 will be implemented. If the Coroner determines the remains are Native American and not the result of a crime scene, the Coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (§ 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the District does not agree with the recommendations of the MLD, the NAHC can mediate (§ 5097.94 of the PRC). If no agreement is reached, the District must rebury the remains where they will not be further disturbed (§ 5097.98 of the PRC). This will also include either recording the site with the NAHC or the appropriate information center; using an open space or conservation zoning designation or easement; or recording a reinternment document with

the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less Than Significant Impact. California Health and Safety Code, Section 7050.5; CEQA Guidelines, Section 15064.5; and California Public Resources Code, Section 5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery. Specifically, California Health and Safety Code, Section 7050.5, requires that if human remains are discovered on a project site, disturbance of the site shall remain halted until the coroner has conducted an investigation into the circumstances, manner, and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation, or to his or her authorized representative, in the manner provided in Section 5097.98 of the Public Resources Code. If the coroner determines that the remains are not subject to his or her authority and if the coroner has reason to believe the human remains to be those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

There are no cemeteries or known human burials at the project site, and the subject property has been previously disturbed by parking lot development; however, ground disturbance (i.e., grading and excavation) would have the potential to result in discovery of human remains (although the potential is very low). In the unlikely event that human remains are discovered during ground-disturbing activities, compliance with existing law regarding the discovery of human remains would reduce potential impacts to human remains to less than significant levels. No mitigation measures are necessary.

3.6 ENERGY

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?

Less Than Significant Impact. Project would result in short-term construction and long-term operational energy consumption.

Short-Term Construction

Construction of the project would require energy use to power the construction equipment. The energy use would vary during different phases of construction—most of the construction equipment during demolition and grading would be gas or diesel powered, and the later construction phases would require electricity-powered equipment for interior construction and architectural coatings. Construction activities would be subject to applicable regulations such as anti-idling measures and the use of alternative fuels if possible, thereby reducing energy consumption. Transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, and construction

worker vehicles that would use diesel fuel and gasoline. Impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. Project construction would not result in a significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources. For example, there are no unusual characteristics that would directly or indirectly cause construction activities to be any less efficient than would occur elsewhere (restrictions on equipment, labor, types of activities, etc.).

Long-Term Operation

The new school would consume electricity for various purposes—heating, cooling, and ventilation of buildings; water heating; operation of electrical systems; lighting; use of on-site equipment and appliances, etc. Pacific Gas and Electric Company provides electric and gas service to the Town. There is extensive and reliable infrastructure for electricity and gas services in the area.

California's Building Energy Efficiency Standards are updated on a three-year cycle to incorporate new energy efficiency technologies.[3] The 2019 Building Energy Efficiency Standards were adopted on May 9, 2018 and went into effect for new construction January 1, 2020. The 2019 standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements; 4) and nonresidential lighting requirements (CEC 2018a). Under the 2019 standards, nonresidential buildings (which include school buildings) are 30 percent more energy efficient compared to the 2016 standards (CEC 2018b). However, based on a study of the statewide impacts of the 2019 changes to the California Energy Efficiency Standards, the reductions for newly constructed nonresidential buildings are estimated to total 10.7 percent for electricity and 1 percent for natural gas (NORESCO 2018). Compared to the current continuation school and other older District schools, the new school building would be significantly more energy efficient.

The new school would serve students currently living in the region and would not generate an increase in the District-wide student population. The project would not result in a significant increase in motor vehicle transportation energy during school operation over what was used for the damaged school or for the temporary school because VMT would be similar.

There are no aspects of the project that would foreseeably result in the inefficient, wasteful, or unnecessary consumption of energy during operation. Therefore, impacts would be less than significant.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The State's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill

[3] The California Energy Code, part 6 of the California Building Standards Code which is title 24 of the California Code of Regulations, also titled The Energy Efficiency Standards for Residential and Nonresidential Buildings.

350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Senate Bill 350 also set a new goal to double the energy efficiency savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Governor Brown signed Senate Bill 100 (SB 100), which raises California's RPS requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also establishes a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Also, in compliance with the Building Energy Efficiency Standards and CALGreen, the new campus would be significantly more energy efficient than other schools in the District. The project would be reviewed by DSA for compliance with design and construction and energy compliance. The project would not conflict with state or local plans for renewable energy or energy efficiency. No impacts would occur.

3.7 GEOLOGY AND SOILS

The analysis in the section is based partly on the following technical studies which is included as Appendix D to this Initial Study.

- *Geotechnical Engineering and Geologic Hazards Report*, NV5, 2020, August.

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.

Less Than Significant Impact. Fault rupture impacts occur when a structure is situated on top of an active fault that displaces in two separate directions during an earthquake. The Alquist-Priolo Earthquake Fault Zoning Act was adopted in 1972 to prevent the construction of buildings in areas where active faults have surface expression. Surface fault rupture is earth surface broken by fault movement. Sudden surface rupture from severe earthquakes can cause extensive property damage, but even slow fault movement (known as "fault creep") can cause displacement that results in offset or disfiguring of curbs, streets, buildings, and other infrastructure.

The proposed project site is not within an Alquist-Priolo Zone, nor is it situated on any known active or potentially active fault (USGS 2020). The Cleveland Hills fault system is approximately 20 miles south of the site and is the closest Alquist-Priolo Earthquake Fault Zone (Chico Quadrangle) to the project site. While the proximity of the fault zone to the subject property could subject it to moderate and possibly

strong ground motion, such motion would not be greater than at other sites in seismically active northern California. Impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. The project site is in a seismically active region of northern California. Ground shaking originating from active faults in the region is expected to induce lower horizontal accelerations due to smaller anticipated earthquakes and/or greater distances to other faults. Regional faulting is associated with the northern extent of the Foothill Fault System which includes the Chico Monocline, Cohasset Ridge Fault, Paradise Fault, Magalia Fault, and the Cleveland Hills Fault. The northern part of the fault zone is split into three branches: the Melones fault zone, the Cleveland Hills fault to the south, and Chico Monocline fault zone to the west. However, the nearest active fault is the Cleveland Hills fault, approximately 20 miles south. Although seismic activity from the Cleveland Hills fault could potentially affect the project site, the site is at no greater risk than the surrounding development and infrastructure. Impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand or silt deposits that behave as a liquid and lose their load-supporting capability when strongly shaken. Loose granular soils and silts that are saturated by relatively shallow groundwater are susceptible to liquefaction. According to the Geotechnical Engineering and Geologic Hazards Report, NV5 concluded that the site is not susceptible to post-liquefaction settlement and lateral spreading that would be detrimental to the proposed site improvements. Consequently, the potential for liquefaction of the soil and rock beneath the site is considered low. Therefore, impacts would be less than significant.

iv) Landslides?

Less Than Significant Impact. The existing topography at the site and near vicinity consists of low to moderately sloping hillside terrain. The site is not located in an area of known historical landslides. No evidence of past landslides or soil creep was identified during NV5's field investigation. NV5 concluded that the potential for the occurrence of a landslide hazard is very low due to the lithified characteristics of the Olivine Basalt Formation located within the site and near vicinity. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. Project development would involve grading and construction activities that would temporarily leave disturbed soil vulnerable to erosion if effective erosion control measures were not used. Construction of the proposed project would be required to comply with best management practices (BMPs) that reduce or eliminate soil erosion from construction sites. Common means of soil erosion from construction sites include water, wind, and being tracked off site by vehicles. Compliance with BMPs, such as jute bales, covering loads, truck washing areas, and covering stockpiles of materials would reduce soil erosion during construction. Paved and building areas, coupled with maintained landscaping, will reduce the potential

for erosion during operation. Compliance with BMPs is required by the federal and state Clean Water Act and is administered by the Town of Paradise. Compliance with existing regulations governing erosion from construction sites would ensure the project's impacts on soil erosion would be less than significant.

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. Project development would not cause substantial hazards related to liquefaction and landslides, as substantiated previously in Sections 3.7.a.iii and 3.7.a.iv, respectively. Lateral spreading is the downslope movement of surface sediment due to liquefaction in a subsurface layer. The topography in the vicinity of the project site is relatively flat. Therefore, the potential for lateral spreading at the project site is considered very low. Impacts would be less than significant.

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. Expansive soils shrink or swell as the moisture content decreases or increases; the shrinking or swelling can shift, crack, or break structures built on such soils. NV5 did not encounter highly expansive soil within the shallow soil or zone that would be influenced by the foundation loads at the site during the subsurface investigation. The site soil conditions observed during the surface reconnaissance and the subsurface geotechnical investigation are characterized as fine grain (i.e., silt and clay) size soils; test results indicate that the near surface soils have a very low to low expansion potential. If expansive soils are encountered during grading of the site, and if the property owner desires to use expansive soil to construct engineered fills, then NV5 recommends that they be notified to prepare recommendation options for soil constructing fills with potentially expansive soil. Impacts would be less than significant.

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

No Impact. Wastewater in the Town of Paradise is disposed of through a septic system. The Town's Onsite Septic Division ensures the proper design construction, maintenance, and monitoring of all wastewater disposal via standard septic systems or state of the art alternative systems throughout the community. According to the Town of Paradise's Soils Survey, the site is comprised of Aiken Very Deep soils with slopes that range from zero to 30 percent; the Aiken series consists of well-drained soils with permeability that is moderately slow (Paradise, 2020a; Paradise 2020b; NRCS 2020). Thus, the site does not contain soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems. No impact would occur.

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

No Impact. Paleontological resources are fossilized remains of past life on earth, such as bones, shells, leaves, tracks, burrows, and impressions. There are no unique geological features on site; the project site is currently developed. Therefore, no impact would occur.

3.8 GREENHOUSE GAS EMISSIONS

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHGs is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the twentieth and twenty-first centuries. Other GHGs identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[4, 5]

This section analyzes the project's contribution to global climate change impacts in California through an analysis of project-related GHG emissions. Information on manufacture of cement, steel, and other "life cycle" emissions that would occur as a result of the project are not applicable and are not included in the analysis.[6] Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this pollutant in the state's AB 32 inventory and treats this short-lived climate pollutant separately (CARB 2017).[7]

The analysis in the section is based party on the following technical studies which are included as Appendix A to this Initial Study.

- *Air Quality & Greenhouse Gas Assessment Ridgeview High School Project*, ECORP, 2021, January.

A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

Would the project:

[4] Water vapor (H_2O) is the strongest GHG and the most variable in its phases (vapor, cloud droplets, ice crystals). However, water vapor is not considered a pollutant, but part of the feedback loop rather than a primary cause of change.

[5] Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of PM emitted from burning fuels. Reducing black carbon emissions globally can have immediate economic, climate, and public health benefits. California has been an international leader in reducing emissions of black carbon, with close to 95 percent control expected by 2020 due to existing programs that target reducing PM from diesel engines and burning activities (CARB 2017). However, state and national GHG inventories do not yet include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

[6] Life cycle emissions include indirect emissions associated with materials manufacture. However, these indirect emissions involve numerous parties, each of which is responsible for GHG emissions of their particular activity. The California Resources Agency, in adopting the CEQA Guidelines Amendments on GHG emissions found that lifecycle analyses was not warranted for project-specific CEQA analysis in most situations, for a variety of reasons, including lack of control over some sources, and the possibility of double-counting emissions (see Final Statement of Reasons for Regulatory Action, December 2009). Because the amount of materials consumed during the operation or construction of the proposed project is not known, the origin of the raw materials purchased is not known, and manufacturing information for those raw materials are also not known, calculation of life cycle emissions would be speculative. A life-cycle analysis is not warranted (OPR 2008).

[7] Particulate matter emissions, which include black carbon, are analyzed in Section 3.3, *Air Quality*. Black carbon emissions have sharply declined due to efforts to reduce on-road and off-road vehicle emissions, especially diesel particulate matter. The State's existing air quality policies will virtually eliminate black carbon emissions from on-road diesel engines within 10 years (CARB 2017).

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

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

Construction

Construction-related activities that would generate GHG emissions include worker commute trips, haul trucks carrying supplies and materials to and from the Project site, and off-road construction equipment (e.g., backhoes, pavers, forklifts). Table 3, *Construction-Related GHG Emissions*, illustrates the specific construction generated GHG emissions that would result from construction of the proposed project.

Table 3 Construction-Related GHG Emissions

Emissions Source	Co2e (Metric Tons/Year)
Construction in 2021	208
Construction in 2022	97
Project Construction Total	**305**
CAPCOA Threshold	900
Exceeds Threshold?	**No**

Source: CalEEMod, Version 2016.3.2. Totals may not equal to the sum of the values as shown due to rounding

As shown in Table 3, project construction would result in the generation of approximately 305 metric tons of CO_2e over the course of construction. Annual emissions would be generated at levels below the California Air Pollution Control Officers Association (CAPCOA) significance threshold. Once construction is complete, the generation of these GHG emissions would cease.

Furthermore, GHG emissions generated by the construction sector have been declining in recent years. For instance, construction equipment engine efficiency has continued to improve year after year. The first federal standards (Tier 1) for new off-road diesel engines were adopted in 1994 for engines over 50 horsepower (hp) and were phased in from 1996 to 2000. In 1996, a Statement of Principles pertaining to off-road diesel engines was signed between the Environmental Protection Agency (EPA), CARB, and engine makers. On August 27, 1998, the EPA signed the final rule reflecting the provisions of the Statement of Principles. The 1998 regulation introduced Tier 1 standards for equipment under 50 hp and increasingly more stringent Tier 2 and Tier 3 standards for all equipment with phase-in schedules from 2000 to 2008. As a result, all off-road, diesel-fueled construction equipment manufactured in 2006 or later has been manufactured to Tier 3 standards. Tier 3 engine standards reduce precursor and subset GHG emissions such as nitrogen oxide by as much as 60 percent. On May 11, 2004, the EPA signed the final rule introducing Tier 4 emission standards, which were phased in over the period of 2008-2015. The Tier 4 standards require that emissions of nitrogen oxide be further reduced by about 90 percent. All off-road, diesel-fueled construction equipment manufactured in 2015 or later will be manufactured to Tier 4 standards.

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In addition, the California Energy Commission recently released the 2019 Building Energy Efficiency Standards contained in the California Code of Regulations, Title 24, Part 6 (also known as the California Energy Code). The 2019 updates to the Building Energy Efficiency Standards focus on several key areas to improve the energy efficiency of newly constructed buildings and additions, and alterations to existing buildings. For instance, effective January 1, 2017, owners/builders of construction projects have been required to divert (recycle) 65 percent of construction waste materials generated during the project construction phase. This requirement greatly reduces the generation of GHG emissions by reducing decomposition at landfills, which is a source of CH_4, and reducing demand for natural resources.

Operations

Long-term operational GHG emissions attributable to the project are identified in Table 4.

Table 4 Operational-Related GHG Emissions

Emissions Source	Co_2e (Metric Tons/Year)
Area Source Emissions	0
Energy Source Emissions	11
Mobile Source Emissions	377
Solid Waste Emissions	14
Water Emissions	4
Total Emissions	**406**
CAPCOA Threshold	900
Exceeds Threshold?	**No**

Source: CalEEMod, Version 2016.3.2. Totals may not equal to the sum of the values as shown due to rounding
Notes: Emission projections are predominately based on CalEEMod model defaults for Butte County. Mobile source emission data used in CalEEMod is based on estimated traffic trip generation rates identified by Headway Transportation (2020).

As shown in Table 4, project operations would result in the generation of 406 metric tons of CO_2e per year and would not exceed CAPCOA's significance threshold of 900 metric tons annually. Therefore, the proposed project's cumulative contribution to GHG emissions is less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact. The Butte County Association of Governments (BCAG) adopted the 2016 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). The RTP/ SCS sets the GHG reduction goal of 6 percent and a seven percent per capita reduction below 2005 levels by the end of 2020 and 2035, respectively (CARB 2018). The RTP/SCS charts a course for closely integrating land use and transportation so that the region can grow smartly and sustainably (the 2020 RTP/SCS has been drafted by BCAG at the time of this analysis yet had not been adopted). The proposed project is consistent with the Town of Paradise General Plan designation and zoning classification at the site. Land use information is generally utilized to inform long-range planning documents, including the RTP/SCS. If a given project is consistent with the land use designation, the project is generally consistent with the RTP/SCS GHG emission projections and would not increase emissions beyond what is anticipated in the RTP/SCS or inhibit the County from reaching its reduction targets. Thus, while the proposed project would generate GHG emissions, the development would

not obstruct the achievement of the RTP/SCS emission reduction targets. Since the development is consistent with BCAG's currently RTP/SCS, the project would not result in an increase in the severity of operational GHG emission-related impacts. Consequently, the project would not interfere with BCAG's ability to implement the regional strategies outlined in the SCS. Impacts would be less than significant.

3.9 HAZARDS AND HAZARDOUS MATERIALS

The analysis in the section is based party on the following technical studies which are included as Appendix F to this Initial Study.

- *Phase I Environmental Site Assessment Ridgeview Continuation High School*, PlaceWorks, 2020, December.

The term "hazardous material" is defined in different ways by different regulatory programs. For purposes of this environmental document, the definition of "hazardous material" is similar to that in the California Health and Safety Code, § 25501:

> Hazardous materials that, because of their quantity, concentration, or physical or chemical characteristics, pose a significant present or potential hazard to human health and safety or to the environment if released into the workplace or the environment.

"Hazardous waste" is a subset of hazardous materials, and the definition is essentially the same as that in the California Health and Safety Code, § 25517, and in the California Code of Regulations, Title 22, § 66261.2:

> Hazardous wastes are those that, because of their quantity, concentration, or physical, chemical, or infectious characteristics, may either cause, or significantly contribute to an increase in mortality or an increase in serious illness, or pose a substantial present or potential hazard to human health or the environment when improperly treated, stored, transported, disposed of, or otherwise managed.

Hazardous materials can be categorized as hazardous nonradioactive chemical materials, radioactive materials, and biohazardous materials (infectious agents such as microorganisms, bacteria, molds, parasites, viruses, and medical waste).

A Phase I Environmental Site Assessment (Phase I ESA) was prepared to disclose potential environmental conditions on the project site. The purpose of a Phase I ESA is to identify recognized environmental conditions (RECs) in connection with the subject property. A REC is defined as the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment (PlaceWorks 2020). Conditions that are determined to be de minimis, which do not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies, are not recognized environmental conditions.

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The purpose of the Phase I ESA is also to further identify historical RECs and controlled RECs. A historical REC (HREC) is a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls. A controlled REC (CREC) is a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority, with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls. The Phase I ESA also followed Department of Toxic Substances Control (DTSC) guidelines for Phase I evaluations for school sites.

Would the project:

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.

Construction

Construction activities of the proposed project would involve the use of larger amounts of hazardous materials than would project operation. Construction activities would include the use of materials such as cleansers and degreasers; fluids used in routine maintenance and operation of construction equipment, such as oil and lubricants; fertilizers; pesticides; and architectural coatings including paints. 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 completion of the construction phase. Project construction workers would also be trained in safe handling and hazardous materials use.

The use, storage, transport, and disposal of construction-related hazardous materials and waste would be required to conform to existing laws and regulations, including the California Department of Toxic Substances Control, US Environmental Protection Agency, California Division of Occupational Safety and Health, California Department of Transportation, Butte County Public Health Department, Paradise Fire & Rescue, and CAL FIRE. Title 40 of the Code of Federal Regulations, part 263, establish standards which apply to persons transporting hazardous waste. If a transporter discharges or spills hazardous waste, he or she is required to take appropriate, immediate action to protection human health and the environment such as notifying local authorities. Compliance with applicable laws and regulations governing the use, storage, and transportation of hazardous materials through the implementation of established safety practices, procedures, and reporting requirements would ensure that all potentially hazardous materials are used and handled in an appropriate manner and 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 for the cleanup and disposal of that contaminant. All contaminated waste encountered would be required to be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, strict adherence to all emergency response plan requirements set forth by the Town of Paradise and CAL FIRE would be required through the duration of the construction phase. Therefore, hazards to the public or the

environment arising from the routine use of hazardous materials during construction would be less than significant and no mitigation measures are necessary.

Operation

Operation of the proposed project would involve the limited use of hazardous materials for air conditioning, janitorial, maintenance, and repair activities. These materials would include cleansers, paints, degreasers, adhesive, sealers, fertilizers, and pesticides for cleaning and maintenance purposes. However, these types of materials are not considered acutely hazardous and would be used in limited quantities. Additionally, school facilities are not associated with uses that use, generate, store, or transport large quantities of hazardous materials—such uses generally include manufacturing, industrial, medical (e.g., hospital), and other similar uses.

Furthermore, the use, storage, transport, and disposal of hazardous materials of the proposed project would be required to comply with existing regulations of several agencies, including the California Department of Toxic Substances Control, US Environmental Protection Agency, California Division of Occupational Safety and Health, California Department of Transportation, Butte County Public Health Department, Paradise Fire & Rescue, and CAL FIRE. Compliance with applicable laws and regulations governing the use, storage, transport, and disposal of hazardous materials through the implementation of established safety practices, procedures, and reporting requirements would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur.

Therefore, hazards to the public or the environment arising from the routine use, storage, transport, and disposal of hazardous materials during long-term operation of the proposed project would not occur. Impacts would be less than significant, and no mitigation measures are necessary.

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. See response to Section 3.9.a., above. As concluded in this section, hazards to the public or the environment arising from the routine use of hazardous materials during project construction and operation phases would be less than significant and no mitigation measures are necessary.

Based on the results of the Phase 1 ESA, no RECs and CRECs were not identified for the project site. A HREC was identified that a structure was burned in the 2018 Camp Fire and was assessed under the oversight of the State of California and Butter County. A Phase I and Phase II were implemented for the site and the site was released. The District is in the process of completing a Phase I Addendum to assess for potential impacts to soil from lead-based paint and organochlorine pesticides from possible termiticide usage. Lead is regulated as a hazardous material, and inorganic lead is regulated as a toxic air contaminant. Lead-containing paints, according to Cal/OSHA, are defined as paints reported with any detectable levels of lead by paint chip analysis (8 CCR § 1532.1(d)). When disturbed for construction purposes, these surfaces are subject to Cal/OSHA exposure assessment requirements.

Several regulations and guidelines pertain to abatement of and protection from exposure to lead-based paint:

- 8 CCR Subchapter 4 (Construction Safety Orders), Section 1532.1

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- Title 29 CFR 1926, Subpart D

These rules and regulations provide exposure limits, exposure monitoring, respiratory protection, and good working practice for workers exposed to lead. In California, lead-based-paint abatement must be performed and monitored by contractors with appropriate certification from the California Department of Health Services. California Health and Safety Code (HSC) Sections 17920.10 and 105255 require lead to be contained during demolition activities. Any necessary remediation will be performed consistent with these regulations and as required by a condition of approval.

Additionally, Section 17213 of the California Education Code and Section 21151.8 of the California Public Resources Code prohibit construction of a school upon a current or former hazardous waste disposal site or solid waste disposal site. Based on site inspection and information reviewed for preparation of the Phase I ESA, the project site is not located on a current or former disposal site.

Compliance with the previously discussed regulations is already standard practice at District schools, including training school staff to safely contain and clean up hazardous materials spills; maintaining hazardous materials spill containment and cleanup supplies on-site; implementing school evacuation procedures as needed; and contacting the appropriate hazardous materials emergency response agency immediately pursuant to requirements of regulatory agencies.

Based on the preceding, hazards to the public or the environment arising from the disturbance and/or removal of hazardous materials onsite would be less than significant, and no mitigation measures are necessary.

c) 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. Paradise High School, located to the west of the project site accord Maxwell Drive, is the only school located within one-quarter mile. As discussed above under Responses 3.9(a) and 3.9(b), the use of hazardous materials and substances during the operation of the proposed project is generally minimal and in small quantities. All hazardous materials and substances at the proposed project site would be subject to federal, state, and local health and safety requirements—e.g., Resource Conservation and Recovery Act; California Hazardous Waste Control Law; and principles prescribed by the California Department of Health Services, Centers for Disease Control and Prevention, and National Institutes of Health—and the proposed project would be under the regulatory oversight of agencies such as the Butte County Public Health Department, Department of Toxic Substance Control, and the Regional Water Quality Control Board. The proposed project would result in a less than significant impact with regard to the emission or handling of hazardous or acutely hazardous materials, substances, or wastes within 0.25 mile of an existing or proposed school and no mitigation measures are necessary.

d) 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?

No Impact. The Phase I ESA prepared for the proposed project reviewed federal, state and regional regulatory agency databases (such as Haznet, Federal NPL Sites, State and Tribal Registered Storage Tanks, Federal ERNS List, etc.) to consider the potential of contamination from nearby sites and the project site. Results of the records search did not identify the project site under these regulatory databases. No hazardous materials sites were listed on the project site or within 0.25 mile of the project site with the exception of Paradise High School listed as a generator. However, no violations are listed for the facility on the EPA Enforcement and Compliance History database. This site is not expected to have impacted the project site. Therefore, no impact to the public or to the environment would occur as a result of the project and no mitigation measures are necessary.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles or 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 not within an airport land use plan and there are no public airports or private airstrips within two miles of the site. The nearest airport to the project site is the Paradise Airport, approximately 3.2 miles to the south. Therefore, no impact would occur, and no mitigation measures are necessary.

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. The Standardized Emergency Management System (SEMS), California Code of Regulations, Title 19, Division 2, Section 2443, requires compliance with the SEMS to "be documented in the areas of planning, training, exercise, and performance." The Town of Paradise Emergency Operations Plan (EOP) was approved by Town Council November 2011. The purpose of the OEP is to provide the basis for a coordinated response before, during and after a disaster incident affecting the Town of Paradise, Under the OEP, during a local level emergency or disaster, the Town Manager serves as the Emergency Services Coordinator and is responsible for organizing and directing the preparedness efforts of the town's emergency operations with the Assistant Town Manager and Paradise's mutual aid partners (Paradise 2011).

The proposed project would not interfere with the implementation of the OEP and any of the daily operations of the Town's Emergency Operation Center, Paradise Fire Department (PFD), or Paradise Police Department. All construction activities would be required to be performed per the Town's and PFD's standards and regulations. For example, the proposed project would be required to provide the necessary on and offsite access and circulation for emergency vehicles and services during the construction and operation phases. The proposed project would also be required to go through the Town's development review and permitting process and would be required to incorporate all applicable design and safety standards and regulations, as set forth by PFD and in the Chapter 15.09 (Fire Code) of the Town's Code of Ordinance, to ensure that they do not interfere with the provision of local emergency services (e.g., provision of adequate access roads to accommodate emergency response vehicles, adequate numbers/locations of fire hydrants, etc.).

Therefore, the proposed project would not impair implementation of or physically interfere with the Town of Paradise nor Butte County's emergency response or evacuation plans. Project-related impacts would be less than significant, and no mitigation measures are necessary.

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

Less Than Significant Impact. A wildland fire hazard area is typically characterized by areas with limited access, rugged terrain, limited water supply, and combustible vegetation. As substantiated in Section 3.20, *Wildfire*, the project site is located in a VHFHSZ within the LRA (CAL FIRE 2008). Development of the project would comply with all Town of Paradise requirements including fire flows, on-site hydrants, and backflow assemblies. Project design and construction would comply with requirements for building materials and construction methods for new buildings in a fire hazard severity zone set forth in California Building Code (CBC; California Code of Regulations Title 24 Part 2) Chapter 7A. Chapter 7A contains requirements for roofing; attic ventilation; exterior walls; exterior windows and glazing; exterior doors; decking; protection of underfloor, appendages, and floor projections; and ancillary structures. The project would also comply with California Fire Code (CFC; California Code of Regulations Title 24 Part 9) Chapter 49, which sets forth requirements generally parallel to those in CBC Chapter 7A. Compliance with the above codes and regulations, would ensure that the proposed project would not result in a fire hazard or exacerbate the fire risk in the Project area. Adherence to existing local, state, and federal laws would ensure that this impact remains less than significant.

3.10 HYDROLOGY AND WATER QUALITY

Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact With Mitigation Incorporated.

Construction

As part of Section 402 of the Clean Water Act, the US Environmental Protection Agency has established regulations under the National Pollution Discharge Elimination System ("NPDES") program to control direct stormwater discharges. The NPDES program regulates industrial pollutant discharges, which include construction activities. In California, the State Water Resources Control Board ("SWRCB") administers the NPDES permitting program and is responsible for developing NPDES permitting requirements.

Paradise Municipal Code Section 8.56.060 requires development to comply with a Municipal Separate Storm Sewer System (MS4) Permit from the Central Valley Regional Water Quality Control Board. Section F.1 of the MS4 permit specifies requirements for new developments, and Section F.1.D details the requirements for standard stormwater mitigation plans (also known as water quality management plans). The MS4 permit

imposes pollution prevention requirements on planned developments, construction sites, commercial and industrial businesses, municipal facilities and activities, and residential activities.

Requirements for waste discharges potentially affecting stormwater from construction sites of one acre or more are set forth in the SWRCB's Construction General Permit, Order No. 2012-0006-DWQ, issued in 2012. The site is larger than one acre and would be subject to requirements of the Construction General Permit. Projects obtain coverage under the Construction General Permit by filing a Notice of Intent with the SWRCB prior to grading activities and preparing and implementing a Storm Water Pollution Prevention Plan (SWPPP) during construction. The primary objective of the SWPPP is to identify, construct, implement, and maintain BMPs to reduce or eliminate pollutants in stormwater discharges and authorized non-stormwater discharges from the project site, and to contain hazardous materials. Categories of BMPs used in SWPPPs are described in Table 5, *Construction Best Management Practices*.

Table 5 Construction Best Management Practices

Category	Purpose	Examples
Erosion Controls and Wind Erosion Controls	Cover and/or bind soil surface, to prevent soil particles from being detached and transported by water or wind	Mulch, geotextiles, mats, hydroseeding, earth dikes, swales
Sediment Controls	Filter out soil particles that have been detached and transported in water	Barriers such as straw bales, sandbags, fiber rolls, and gravel bag berms; desilting basin; cleaning measures such as street sweeping
Tracking Controls	Minimize the tracking of soil offsite by vehicles	Stabilized construction roadways and construction entrances/exits; entrance/outlet tire wash
Non-Storm Water Management Controls	Prohibit discharge of materials other than stormwater, such as discharges from the cleaning, maintenance and fueling of vehicles and equipment. Conduct various construction operations, including paving, grinding, and concrete curing and finishing, in ways that minimize non-stormwater discharges and contamination of any such discharges	BMPs specifying methods for: paving and grinding operations; cleaning, fueling, and maintenance of vehicles and equipment; concrete curing; concrete finishing
Waste Management and Controls (i.e., good housekeeping practices)	Management of materials and wastes to avoid contamination of stormwater	Spill prevention and control, stockpile management, and management of solid wastes and hazardous wastes

Source: CASQA 2015

The project's construction contractor would be required to prepare and implement a SWPPP and associated BMPs in compliance with the CGP during grading and construction. The SWPPP would specify BMPs, such as those outlined in Table 5, that the construction contractor would implement to protect water quality by eliminating and/or minimizing stormwater pollution prior to and during grading and construction and show the placement of those BMPs. Additional construction BMPs that would be incorporated into the project's SWPPP and implemented during the construction phase include, but are not limited to:

- Perimeter control with silt fences and perimeter sandbags and/or gravel bags.
- Stabilized construction exits with rumble strip(s)/plate(s).
- Installation of storm drain inlet protection on affected on-site drains and within roadways.
- Installation of silt fences around stockpile and covering of stockpiles.

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- Use of secondary containment around barrels, containers, and storage materials that may impact water quality.
- Stabilization of disturbed areas where construction ceases for a determined period (e.g., one week) with erosion controls.
- Installation of temporary sanitary facilities and dumpsters.

BMPs identified in the SWPPP would reduce or avoid contamination of stormwater with sediment and other pollutants such as trash and debris; oil, grease, fuels, and other toxic chemicals; paint, concrete, asphalt, bituminous13 materials, etc.; and nutrients. Adherence to the BMPs in the SWPPP would reduce, prevent, minimize, and/or treat pollutants and prevent degradation of downstream receiving waters. Furthermore, to ensure that water quality and waste-discharge impacts are less than significant, mitigation measures HYD-1 through HYD-3 would require that all slopes be graded to drain away from building areas, all landscape areas are graded near and adjacent to buildings to prevent ponding of water, and that all building downspouts are directed to solid pipe collectors.

Based on the preceding, water quality and waste-discharge impacts from project's grading and construction activities would be less than significant with mitigation incorporated.

Operation

Operational-related activities of the proposed project (e.g., runoff from parking areas, solid waste storage areas, and landscaped areas) would generate pollutants that could adversely affect the water quality of downstream receiving waters if effective measures are not used to keep pollutants out of and remove pollutants from urban runoff. Therefore, the Town is responsible for reviewing project plans and assuring that requirements for waste discharges potentially affecting stormwater from project operations are met.

These requirements are set forth in Chapter 8.56 (Stormwater Quality Management) of the Town's Code. As previously stated, the proposed project is subject to the NPDES permit. Compliance with the NPDES permit includes the incorporation of BMPs into the project's Standard Urban Stormwater Mitigation Plan (SUSMP). The project applicant is required to prepare a stormwater mitigation plan that includes those BMPs necessary to control stormwater pollution from the completed project. The structural or treatment control BMPs (including, as applicable, post-construction treatment control BMPs) in the stormwater mitigation plan must meet the design standards set forth in the municipal NPDES permit. SUSMP requirements include minimizing stormwater pollutants and limiting peak post-project stormwater runoff rates to no greater than predevelopment rates where increased runoff could increase downstream erosion.

As part of the approval process, the Town is responsible for reviewing the plan to ensure that all applicable requirements have been addressed and that the applicant has identified BMPs necessary to protect the municipal separate storm sewer system from discharges. The BMPs could include maintaining landscaping using minimum or no pesticides, providing an adequate number of receptacles while keeping them covered, and sweeping sidewalks regularly to prevent accumulation of litter and debris. Project design features, such as areas draining to BMPs would address the anticipated and expected pollutants of concern during the project's operational phase. Onsite landscaping would assist in minimizing the amount of runoff from the site by

providing permeable areas for water infiltration and decreasing runoff volume. Infiltration through landscaped areas would serve as a water treatment function.

Moreover, no grading permit shall be issued until the Town confirms that the project's stormwater mitigation plan complies with the applicable municipal NPDES permit requirements. Based on the preceding, the project would comply with water quality standards, and impacts are less than significant.

Mitigation Measures

WQ-1 Grade all slopes to drain away from building areas within a minimum 4 percent slope for a distance of not less than 10 feet from the building foundations.

WQ-2 Grade all landscape areas near and adjacent to buildings to prevent ponding of water.

WQ-3 Direct all building downspouts to solid pipe collectors, which discharge to natural drainage courses, storm sewers, catchment basins, infiltration subdrains or other drainage facilities.

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 proposed project is in the area subject to the Butte County Groundwater Management Plan (BCGMP) area. Groundwater in Butte County is governed by the County's Groundwater Management Plan. The BCGMP introduces Butte County's groundwater resources setting and plan implementation which formalizes the plan's groundwater management goal, management objectives, and plan components that elaborate on both current actions and planned future actions. According to BCGMP, groundwater recharge is not well understood but it is likely that surface water bodies contribute to groundwater recharge including water distributed for agricultural production throughout Butte County (Butte County 2004). Much of the surface water flow in Butte County originates from rainfall and snowmelt in the foothill and mountain areas. Surface water flows in a southwest direction from the higher elevations, through the basin, to the Sacramento River. Surface water flows in the county are extremely variable, both seasonally and annually, in response to the timing and magnitude of precipitation and snowmelt (Butte County 2004).

According to Paradise Irrigation District's (District) Urban Water Management Plan (UWMP), the District overlies an area with fractured rock aquifers as the only potential ground water supply (PID 2016). Groundwater supply is assumed to be the 30 acre-feet produced annually to keep the well operational. These types of aquifers are not expected to provide a significant source of water. Therefore, the District's primary water supply system is reliant upon water captured and stored from Little Butte Creek. Little Butte Creek is a minor stream in the Sacramento Valley drainage that rises in the northwestern foothills of the Sierra Nevada and lies wholly within Butte County. The District stores water from Little Butte Creek in two reservoirs located on the drainage which include the Magalia and Paradise Reservoirs (PID 2016).

Based on the analysis provided in the UWMP, there are no legal, environmental, or water quality factors that result in inconsistency of supply for the community's water in the Little Butte Creek Watershed for the 20-year period studied. Moreover, water supply from surface water, reservoir storage, and groundwater is expected to exceed the total demand by 17,020 to 18,947 acre-feet per year from 2020 to 2040 in a normal year. In

comparison, total water supply is expected to exceed the total demand by 4,667 to 5,941 acre-feet per year from 2020 to 2040 in a single dry year (PID 2016).

According to the Geotechnical Engineering and Geologic Hazards report, groundwater was initially encountered in an exploratory boring at a depth of approximately 45 feet at the time of subsurface investigation. Based on past construction activities in the area, it is common to encounter shallow groundwater seepage in deep foundation boreholes or utility excavations. However, it is not anticipated that the proposed underground utility trenches will encounter shallow groundwater. Based on the above average rainfall, subsurface or geologic conditions and review of groundwater elevations encountered during domestic well drilling near the site, NV5 estimated that the historically high ground water table would be encountered at a depth of 30 to 40 feet. Therefore, the project would not impede sustainable groundwater management, and impacts are less than significant.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in a substantial erosion or siltation on- or off-site? 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. Please refer to issue b) in section 3.7, Geology and Soils, for further discussion of erosion. Surface water drainage would be controlled by building regulations, with the water directed toward existing streets, flood control channels, storm drains, and catch basins. The proposed drainage for the site would not channel runoff on exposed soils, would not direct flows over unvegetated soils, and would not otherwise increase the erosion or siltation potential of the site or any downstream areas. As discussed above, the proposed project is subject to NPDES requirements and the countywide MS4 permit. Additionally, the project applicant is required to submit a SWPPP to reduce erosion and sedimentation of downstream watercourses during project construction. Furthermore, the applicant is required to prepare and submit a detailed erosion control plan. Implementation of this plan would address any erosion issues associated with proposed grading and site preparation. Although future development would create new impervious surfaces on the property, development associated with the proposed project would result in opportunities for landscaped areas to be utilized for stormwater retention.

The project-specific water quality management plan provides BMPs for after construction, such as sweeping sidewalks regularly to prevent accumulation of litter and debris. Therefore, the proposed project would not result in substantial erosion or siltation on- or off-site. Additionally, the proposed permeable asphalt parking lot would reduce impacts from on- or offsite flooding. Therefore, this impact is less than significant.

ii) 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 is required to comply with Paradise Municipal Code Section 8.56.060, which requires development to comply with a MS4 Permit from the Central Valley

Regional Water Quality Control Board. Drainage from the project site would flow via surface flow into the existing storm drains on Maxwell Drive south of the site. The proposed project would disperse runoff to adjacent pervious areas and small collection areas where runoff could be retained. Therefore, increases in runoff as a result of the project would not exceed the capacity of the existing stormwater system, and impacts are less than significant.

iii) Impede or redirect flood flows?

Less Than Significant Impact. The project site is designated by the Federal Emergency Management Agency (FEMA) as being within Zone X, indicating minimal risk of flooding (FEMA 2011). Moreover, the project site is not within a 100- or 500-year flood zone (FEMA 2011). The total existing impervious surface area is 0.65 acres, or 30% of the total project site; the proposed project would result in a total of .14 acres of impervious surfaces, or 6.5% of the total project site. Although the proposed project would increase impervious surfaces, the project site is not located within an area of flood risk, and onsite landscaping as well as mitigation measures WQ-1 through WQ-3 would reduce impacts from on- or off-site flooding. Therefore, impacts are less than significant.

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

No Impact. As provided in 3.10.c.iv, the project site is not within a flood hazard zone. The project site is not in an area that is subject to seiches, mudflows, or tsunamis due to the absence of any nearby bodies of water and mud/debris channels. In addition, the project is not in the vicinity of any levees. Therefore, the project would not be exposed to seiches, mudflows, or tsunami hazards, and no impact would occur.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As provided in section 3.10.b, above, the project site is within the BCGMP area; the proposed improvements would not conflict or obstruct implementation of the BCGMP. The proposed project would comply with water quality requirements set forth in the Statewide General Construction Permit, the NPDES, and the Town of Paradise Municipal Code Section 8.56.010 (Stormwater Quality Management Ordinance). Therefore, the project would not impede sustainable groundwater management of the basin, and impacts are less than significant.

3.11 LAND USE AND PLANNING

Would the project:

a) Physically divide an established community?

No Impact. The proposed project would not divide an established residential community because it would occur entirely on an existing parking lot and vacant land. Minor off-site improvements may include utility hookups and new crosswalks; these improvements would occur within the public right-of-way and would not physically divide the community. Therefore, no impact would occur, and no mitigation measures are necessary.

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?

No Impact. Implementation of the proposed project would generally not conflict with an applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect. The project site is within the Town of Paradise and the prevailing adopted planning and regulatory documents that govern development and use of the project site are the Town of Paradise General Plan and Zoning Code (Title 17 of the Paradise Municipal Code). The Town of Paradise General Plan land use designations of the project site is Public Institutional (P-I). The project site is zoned Community Facilities (C-F) (Paradise 2020b). The proposed continuation school is permitted under the P-I land use designation and C-F zoning district via Town approval and issuance of a site plan review. Alternatively, the District may waive the requirements for site plan review under its authority under Government Code 53094. Regardless, the location of the proposed school is compatibility with the surrounding land uses and no impact would occur, and no mitigation measures are necessary.

3.12 MINERAL RESOURCES

Would the project:

a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?

No Impact. No mineral resource recovery sites of statewide or regional significance are located on or in the immediate vicinity of the project site. According to the Town of Paradise General Plan, there are currently no mining operations in the Town and past gold mining operations has ended (Paradise 1994). Additionally, mining on the project site would be incompatible with the surrounding uses, which consists mostly of residential uses and vacant land. Mining is also not a permitted use under the site's General Plan Land Use and zoning designation Implementation of the proposed project would not result in the loss of availability of a known mineral resource or resource recovery site. No mineral resource impact would occur, and no mitigation measures are necessary.

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. As discussed above in Response 3.12(a), no mineral resource recovery sites are identified on or in the immediate vicinity of the project site. There would be no loss of availability of locally important mineral resources, and no impact would occur. No mitigation measures are necessary.

3.13 NOISE

The analysis in the section is based party on the following technical studies which are included as Appendix F to this Initial Study.

- *Noise Impact Assessment – Ridgeview High School Project*, ECORP Consulting, Inc, 2021, January.

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Details on noise fundamentals can be found in Appendix F.

Existing Noise Environment

Ambient Noise Measurements

The noise environment in the project site is impacted by various noise sources. Mobile sources of noise, especially cars and trucks on area roadways such as Maxwell Drive, are the most common and significant sources of noise in the project area. Other sources of noise are those associated with Paradise High School. In more than 250 sound tests over two days, research identified an average noise level at high schools reaching levels of 63.7 dBA within the camps, with peak events of 85 dBA, generated from activities, e.g., hallway talking, door slamming, student yelling. In addition to typical noise levels during school hours, Paradise High School also accommodates football and softball games and practices on existing fields to the east of the project site. Previous noise measurements conducted by ECORP at outdoor high school sporting events identify noise levels ranging up to 66 dBA.

The project site is predominantly surrounded by a mix of residential and vacant land uses, with Paradise High School located across Maxwell Drive from the project site. To quantify existing ambient noise levels in the project area, a long-term noise measurement on the project site on January 12, 2021 was conducted (see Attachment A of Appendix F). The six-hour measurement was taken between 9:25 a.m. and 2:25 p.m. This measurement is representative of the noise levels throughout typical school hours. The average noise levels and sources of noise measured at each location are listed in Table 6, *Existing (Baseline) Noise Measurements*. As shown in the table below, the ambient recorded noise level is 64.6 dBA at the project site. The most common noise in the project vicinity during the baseline noise measurement was associated with construction work occurring at the existing Paradise High School campus. Thus, the recorded noise levels identified in the table are most likely higher than typically experienced.

Table 6 Existing (Baseline) Noise Measurements

Location	Time	L_{eq}	L_{min}	L_{max}
On the Project Site	9:25 a.m. – 2:25 a.m.	64.6	43.7	96.7

Source: Appendix F

Existing Roadway Noise Levels

Existing roadway noise levels were calculated for the roadway segments in the project vicinity. This task was accomplished using the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) (see Attachment B of Appendix F) and traffic volumes from the Traffic Impact Study (Appendix F). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by Caltrans. The Caltrans data shows that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along these roadway segments

are presented in Table 7, *Existing (Baseline) Traffic Noise Levels*. As shown in the table below, the existing traffic-generated noise levels on project-vicinity roadways currently range from 53.0 to 60.9 dBA CNEL at a distance of 100 feet from the roadway centerline. CNEL is 24-hour average noise level with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

Table 7 Existing (Baseline) Traffic Noise Levels

Roadway Segment	Surrounding Uses	CNEL at 100 feet from Centerline of Roadway
Maxwell Drive		
Between Skyway & Pleasant Lane	Public School	53.0
Between Pleasant Lane & Elliot Road	Public School	53.5
Skyway		
North of Maxwell Drive	Commercial	59.2
South of Maxwell Drive	Commercial	59.7
Elliot Road		
West of Maxwell Drive	Residential	54.7
East of Maxwell Drive	Residential	54.3

Source: Appendix F.

Sensitive Receptors

Certain land uses are considered sensitive to noise and vibration: residences, schools, hospital facilities, houses of worship, and open space/recreation and where quiet environments are necessary for the enjoyment, public health, and safety of the community. The nearest sensitive receptors in the vicinity of the project site are residential uses to the south and Paradise High School to the west.

Noise Standards

Federal

Occupational Safety and Health Act (OSHA) of 1970

OSHA regulates onsite noise levels and protects workers from occupational noise exposure. To protect hearing, worker noise exposure is limited to 90 dB with A-weighting (dBA) over an eight-hour work shift (29 Code of Federal Regulations 1910.95). Employers are required to develop a hearing conservation program when employees are exposed to noise levels exceeding 85 dBA. These programs include provision of hearing protection devices and testing employees for hearing loss on a periodic basis.

State

State of California General Plan Guidelines

The State of California regulates vehicular and freeway noise affecting classrooms, sets standards for sound transmission and occupational noise control, and identifies noise insulation standards and airport noise/land-use compatibility criteria. The State of California General Plan Guidelines, published by the Governor's Office of Planning and Research (OPR), also provides guidance for the acceptability of projects within specific CNEL/Ldn contours. The guidelines also present adjustment factors that may be used in order to arrive at

noise acceptability standards that reflect the noise-control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

State Office of Planning and Research Noise Element Guidelines

The State OPR Noise Element Guidelines include recommended exterior and interior noise level standards for local jurisdictions to identify and prevent the creation of incompatible land uses due to noise. The Noise Element Guidelines contain a land-use compatibility table that describes the compatibility of various land uses with a range of environmental noise levels in terms of the CNEL.

Local

Town of Paradise General Plan Noise Element

The Noise Element of the Town of Paradise General Plan identifies several objectives and policies that are applicable to the proposed project:

- **Objective NO-1:** New development of noise-sensitive uses shall not be allowed where the noise level due to non-transportation noise sources will exceed the noise level standards of Table 8, *Noise Level Performance Standards for New Project Affected by or Including Non-Transportation Sources*, as measured immediately within the property line of the new development, unless effective noise mitigation measures have been incorporated into the development design to achieve the standards specified in Table 8.

- **Objective NO-2:** Noise created by new proposed non-transportation noise sources shall be mitigated so as not to exceed the noise level standards of Table 8 as measured immediately within the property line of lands designated for noise-sensitive uses. This objective does not apply to noise sources associated with agricultural operations on lands zoned for agricultural uses.

Table 8 Noise Level Performance Standards for New Project Affected by or Including Non-Transportation Sources

Noise Level Descriptor	Daytime (7:00 a.m. to 10:00 p.m.)	Nighttime (10:00 a.m. to 7:00 p.m.)
Hourly	50 dBA L_{eq}	45 dBA L_{eq}
Maximum	70 dBA L_{eq}	65 dBA L_{eq}

Notes: Each of the noise levels specified above shall be lowered by five dBA for simple tone noises, noises consisting primarily of speech or music, or for recurring impulsive noises. These noise level standards do not apply to residential units established in conjunction with industrial or commercial uses (e.g., caretaker dwellings).
Source: Appendix F.

- **Objective NO-3:** New development of noise-sensitive land uses will not be permitted in areas exposed to existing or projected levels of noise from transportation noise sources which exceed the levels specified in Table 9, *Maximum Allowable Noise Exposure from Transportation Noise Sources*.

- **Objective NO-4:** Noise created by new transportation noise sources, including roadway improvement projects, shall be mitigated so as not to exceed the levels specified in Table 9 at outdoor activity areas or interior spaces of existing noise-sensitive land uses in either the incorporated or unincorporated area.

3. Environmental Analysis

Table 9 Maximum Allowable Noise Exposure from Transportation Noise Sources

Land Use	Outdoor Activity Area[1] CNEL	Interior Spaces	
		CNEL	L_{eq}[2]
Residential	60[3]	45	
Transient Lodging	60[3]	45	
Hospitals, Nursing Homes	60[3]	45	
Theaters, Auditoriums, Music Halls			35
Churches, Meeting Halls	60[3]		40
Office Buildings	60[3]		45
Schools, Libraries, Museums			45
Playgrounds, Neighborhood Parks	70		

Notes: [1]Where the location of outdoor activity areas is unknown the exterior noise level standard shall be applied to the property line of the receiving land use.
[2]As determined for a typical worst-case hour during periods of use.
[3]Where it is not possible to reduce noise in outdoor activity areas to 60 dB CNEL or less using a practical application of the best available noise reduction measures, an exterior noise level of up to 65 dB CNEL may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table.
Source: Appendix F.

- **Policy NP-2:** The feasibility of proposed projects with respect to existing and future transportation noise levels should be evaluated by comparison to Figure 6.4-1, Land Use Compatibility Guidelines of the General Plan.

Figure 6.4-1 of the General Plan identifies an ambient noise environment of 60 dBA CNEL or less as "Acceptable" for the location of school uses. An ambient noise environment of 61 – 75 dBA CNEL is identified as "Conditionally Acceptable" for school uses, which means that schools can only be permitted in such noise environments after careful study and inclusion of protective measures.

Town of Paradise Municipal Code

Per Section 9.18.160 (Construction or demolition—Generally), "It is unlawful and in violation of this chapter for any person to operate or cause the operation of any tools equipment used in construction, drilling, repair, alteration, or demolition work between the hours of 7:00 p.m. and 6:00 a.m. on weekdays or at any time on Sundays or holidays, in such a manner that creates noise clearly audible across a residential zoned or a commercial zoned real property boundary."

Federal Interagency Committee on Noise (FICON)

The FICON thresholds of significance assist in the evaluation of increased traffic noise. The 2000 FICON findings provide guidance as to the significance of changes in ambient noise levels due to transportation noise sources. FICON recommendations are based on studies that relate aircraft and traffic noise levels to the percentage of persons highly annoyed by the noise. FICON's measure of substantial increase for transportation noise exposure is as follows:

- If the existing ambient noise levels at existing and future noise-sensitive land uses (e.g., residential) are less than 60 dBA CNEL and the project creates a readily perceptible 5 dBA CNEL or greater noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or

- If the existing noise levels range from 60 to 65 dBA CNEL and the project creates a barely perceptible 3 dBA CNEL or greater noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or

- If the existing noise levels already exceed 65 dBA CNEL, and the project creates a community noise level increase of greater than 1.5 dBA CNEL.

The nearest noise-sensitive receptors to the project site includes Paradise High School when in session. There are also existing noise-sensitive receptors at the residential land uses on Elliot Road to the south of the project. Objective NO-4 of the Town General Plan Noise Element promulgates an exterior noise standard of 60 dBA CNEL for residential land uses affected by transportation noise and a residential interior noise standard of 45 dBA CNEL. The Town does not promulgate an exterior noise standard for schools affected by transportation noise, but only an interior standard of 45 Leq, as determined for a typical worst-case hour during periods of use. For the purposes of evaluating the impact of increased traffic noise, the numeric exterior noise level threshold of 60 dBA CNEL coupled with FICON standards is employed for vicinity residential land uses affected by project traffic noise. The numeric interior noise level threshold of 45 dBA Leq is employed for Paradise High School, which would be affected by project traffic noise.

Would the project result in:

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

Less Than Significant Impact.

Methodology

This analysis of the existing and future noise environments is based on noise prediction modeling and empirical observations. To estimate the worst-case construction noise levels that may occur at the nearest noise-sensitive receptors in the project vicinity, predicted construction noise levels were calculated utilizing the FHWA's Roadway Construction Model (2006). Stationary noise sources are addressed qualitatively based on reference measurements taken by ECORP Consulting, Inc. The project's contribution of traffic noise has been calculated with the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108) coupled with traffic data provided by Headway Transportation.

Construction Noise Impacts

Construction noise associated with the proposed project would be temporary and would vary depending on the nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for onsite construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., building construction, paving). Noise generated by construction equipment, including earthmovers, material handlers, and portable generators, can reach high levels. Typical operating cycles for these types of

construction equipment may involve one or two minutes of full-power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive receptors in the vicinity of the construction site.

Nearby noise-sensitive land uses consist of Paradise High School when in session. Paradise High School is located across Maxwell Drive from the project site at approximately 110 feet at the nearest. As previously described, Section 9.18.160 of the Town Municipal Code prohibits construction between the hours of 7:00 p.m. and 6:00 a.m. on weekdays and at any time on Sundays or holidays. The Town does not promulgate a numeric threshold pertaining to the noise associated with construction. This is since construction noise is temporary, short term, intermittent in nature, and would cease on completion of the proposed project. Additionally, construction would occur throughout the project site and would not be concentrated at one point.

To estimate the worst-case onsite construction noise levels that may occur at the nearest noise-sensitive receptors in the project vicinity, the construction equipment noise levels were calculated using the Roadway Noise Construction Model for the various construction phases and compared against the construction-related noise level threshold established in the Criteria for a Recommended Standard: Occupational Noise Exposure prepared in 1998 by National Institute for Occupational Safety and Health (NIOSH). A division of the US Department of Health and Human Services, NIOSH identifies a noise level threshold based on the duration of exposure to the source. The NIOSH construction-related noise level threshold starts at 85 dBA for more than 8 hours per day; for every 3-dBA increase, the exposure time is cut in half. This reduction results in noise level thresholds of 88 dBA for more than 4 hours per day, 92 dBA for more than 1 hour per day, 96 dBA for more than 30 minutes per day, and up to 100 dBA for more than 15 minutes per day. For the purposes of this analysis, the lowest, more conservative threshold of 85 dBA Leq is used as an acceptable threshold for construction noise at the nearby sensitive receptors.

The anticipated short-term construction noise levels generated for the necessary equipment were calculated using the Roadway Noise Construction Model for the site preparation, grading, building construction, paving and architectural coating phases. Consistent with FTA recommendations for calculating construction noise, construction noise was measured from the center of the project site, which is approximately 200 feet from Paradise High School. The anticipated short-term construction noise levels generated for the necessary equipment is presented in Table 10, *Construction Average (dBA) Noise Levels at Nearest Receptor*. As shown in Table 10, no individual or cumulative pieces of construction equipment would exceed the 85 dBA NIOSH construction noise threshold during any phase of construction at the nearby noise-sensitive receptors. Project construction would result in minimal additional traffic on adjacent roadways over the time period that construction occurs. According to the CalEEMod model, which is used to predict air pollutant emissions associated with project construction, including those generated by worker commute trips and vendor trips, the maximum number of construction workers and vendors traveling to and from the project site on a single day would be 32 (23 worker trips and 9 vendor trips). According to the California Department of Transportation (Caltrans) *Technical Noise Supplement to the Traffic Noise Analysis Protocol* (2013), doubling of traffic on a roadway is required to result in an increase of 3 dB (outside of the laboratory, a 3-dBA change is considered a just-perceivable difference). Project construction would not result in a doubling of traffic, and therefore its

contribution to existing traffic noise would not be perceptible. Impacts would be less than significant and no mitigation measures are necessary.

Table 10 Maximum Allowable Noise Exposure from Transportation Noise Sources

Equipment	Estimated Exterior Construction Noise Level @ 200 feet	Construction Noise Standards (dBA Leq)	Exceeds Standard at Nearest Receptor?
Site Preparation			
Scraper	67.6	85	No
Grader	69.0	85	No
Tractors/Loaders/Backhoe	68.0	85	No
Combined Site Preparation Equipment	73.0	85	No
Grading			
Grader	69.0	85	No
Rubber Tired Dozer	65.6	85	No
Tractors/Loaders/Backhoes (2)	68.0 (each)	85	No
Combined Grading Equipment	72.9	85	No
Building Construction			
Crane	60.3	85	No
Forklifts (3)	67.4 (each)	85	No
Generator Set	65.6	85	No
Backhoe	61.5	85	No
Welders (3)	58.0	85	No
Combined Building Construction Equipment	72.8	85	No
Paving			
Paver	64.9	85	No
Paving Equipment	70.5	85	No
Rollers (2)	61.0 (each)	85	No
Cement and Mortar Mixer	64.9	85	No
Loaders	63.1	85	No
Combined Paving Equipment	73.1	85	No
Painting			
Air Compressor	61.6	85	No
Combined Architectural Coating Equipment	61.6	85	No

Notes: Construction equipment used during construction derived from CalEEMod 2016.3.2. CalEEMod is designed to calculate air pollutant emissions from construction activity and contains default construction equipment and usage parameters for typical construction projects based on several construction surveys conducted in order to identify such parameters. The distance to the nearest sensitive receptor was calculated from the center of the Project site (approximately 200 feet)..
Source: Appendix F.

Operational Noise Impacts

Land Use Compatibility

As previously stated, Figure 6.4-1 of the Town General Plan identifies an ambient noise environment of 60 dBA CNEL or less as "Acceptable" for the location of new school uses. An ambient noise environment of 61

3. Environmental Analysis

– 75 dBA CNEL is identified as "Conditionally Acceptable" for school uses. As shown in Table 7, the noise emanating from the segment of Maxwell Drive traversing the entirety of the western boundary of the project site was calculated as ranging from 53.0 to 53.5 dBA CNEL under existing conditions. These noise levels fall within the range considered acceptable for the placement of new schools.

Additionally, as shown in Table 6, the ambient noise level recorded on the project site is 64.6 dBA Leq. The exterior-to-interior reduction of newer buildings is generally 30 dBA or more. Thus, the recorded noise level on the project site of 64.6 dBA Leq would fall below the 45 dBA Leq interior noise level standard for schools with the implementation of standard building techniques [64.6 dBA – 30 dBA = 34.6 dBA]. Therefore, this impact would be less than significant.

Offsite Traffic Noise

Future traffic noise levels throughout the project vicinity for the proposed project were modeled based on the traffic volumes identified by Headway Transportation (2020) to determine the noise levels along project vicinity roadways. Table 11, *Proposed Project Predicted Traffic Noise Levels*, shows the calculated offsite roadway noise levels under existing traffic levels compared to future buildout of the Project. The calculated noise levels because of the proposed project at affected land uses are compared to the appropriate Town of Paradise numeric noise thresholds coupled with the FICON recommendations for evaluating the impact of increased traffic noise. As shown in Table 11, the proposed project would not result in interior noise levels at Paradise High School greater than the Town of Paradise interior traffic noise standard for existing schools. Additionally, the proposed project would not generate an increase of noise beyond the FICON significance standards at any vicinity land use and would not result in noise levels exceeding the 60 dBA CNEL exterior noise standard at any residential land use. The manner in which older structures in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. Thus, the proposed project would not result in noise levels exceeding the 45 dBA CNEL interior noise standard at any residential land use [55.0 dBA CNEL – 20 = 35 dBA CNEL]. Therefore, this impact would be less than significant.

Table 11 Proposed Project Predicted Traffic Noise Levels

Roadway Segment	Surrounding Uses	CNEL (or Leq) at 100 feet from Centerline of Roadway		FICON Noise Standard (dBA CNEL)	Town Numeric Noise Standards		Exceed Standards?
		Existing Conditions	Existing + Project Conditions		Exterior	Interior	
Maxwell Drive							
Between Skyway & Pleasant Lane	Public School	34.2 dBA Leq	34.6 dBA Leq	>5	-	45 dBA Leq	No
Between Pleasant Lane & Elliot Road	Public School	34.8 dBA Leq	35.1 dBA Leq	>5	-	45 dBA Leq	No
Skyway							
North of Maxwell Drive	Commercial	59.2 dBA CNEL	59.3 dBA CNEL	>5	-	-	No
South of Maxwell Drive	Commercial	59.7 dBA CNEL	59.8 dBA CNEL	>5	-	-	No
Elliot Road							

Table 11 Proposed Project Predicted Traffic Noise Levels

Roadway Segment	Surrounding Uses	CNEL (or Leq) at 100 feet from Centerline of Roadway		FICON Noise Standard (dBA CNEL)	Town Numeric Noise Standards		Exceed Standards?
		Existing Conditions	Existing + Project Conditions		Exterior	Interior	
West of Maxwell Drive	Residential	54.7 dBA CNEL	55.0 dBA CNEL	>5	60 dBA CNEL	45 dBA Leq	No
East of Maxwell Drive	Residential	54.3 dBA CNEL	54.5 dBA CNEL	>5	60 dBA CNEL	45 dBA Leq	No

Source: Appendix F.

Operational Stationary Noise

Noise in our daily environment fluctuates over time. Some noise levels occur in regular patterns, others are random. School uses, such as that proposed by the project, are not typically associated with excessive, ongoing operations-related noise that would lead to substantial permanent increases in ambient noise levels. Instead, research has identified an average noise level at high schools reaching levels of 63.7 dBA Leq within the campus, with peak events of 85 dBA Lmax, generated from activities, e.g., hallway talking, door slamming, student yelling. The nearest noise sensitive receptors to the project site includes Paradise High School when in session. However, onsite noise-related impacts associated with the proposed project would be similar to the noise generated at Paradise High School. Since the nearest sensitive receptor to the proposed high school is an existing high school, operation of the proposed project is not expected to result in any substantial changes in the ambient noise environment experienced in the area, including the Paradise High School campus. The nearest residential lots in the project vicinity are located approximately 140 feet from the proposed classroom building. As previously stated, sound levels attenuate at a rate of approximately six dB for each doubling of distance from a stationary or point source. Therefore, the nearest residential properties could experience exterior noise levels up to 41.2 dBA Leq, with peak events reaching 62.5 Lmax. These noise levels fall below the Town daytime standards of 50 dBA Leq and 70 dBA Lmax. Therefore, this impact would be less than significant, and no mitigation measures are necessary.

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact.

Construction-Generated Vibration

Excessive groundborne vibration impacts result from continuously occurring vibration levels. Increases in groundborne vibration levels attributable to the proposed project would be primarily associated with short-term construction-related activities. Construction on the project site would have the potential to result in varying degrees of temporary groundborne vibration, depending on the specific construction equipment used and the operations involved. Ground vibration generated by construction equipment spreads through the ground and diminishes in magnitude with increases in distance.

Construction-related ground vibration is normally associated with impact equipment such as pile drivers, jackhammers, and the operation of some heavy-duty construction equipment, such as dozers and trucks. It is

not anticipated that pile drivers would be necessary during project construction. Vibration decreases rapidly with distance and it is acknowledged that construction activities would occur throughout the project site and would not be concentrated at the point closest to sensitive receptors. Groundborne vibration levels associated with construction equipment are summarized in Table 12, *Representative Vibration Source Levels for Construction Equipment*.

Table 12 Representative Vibration Source Levels for Construction Equipment

Equipment Type	PPV at 25 Feet (inches per second)
Large Bulldozer	0.089
Pile Driver	0.170
Caisson Drilling	0.089
Loaded Trucks	0.076
Rock Breaker	0.089
Jackhammer	0.035
Small Bulldozer/Tractor	0.003

Source: Appendix F

The Town of Paradise does not regulate vibrations associated with construction. However, a discussion of construction vibration is included for full disclosure purposes. For comparison purposes, the Caltrans (2020) recommended standard of 0.2 inch per second PPV with respect to the prevention of structural damage for older residential buildings is used as a threshold. This is also the level at which vibrations may begin to annoy people in buildings. Consistent with FTA recommendations for calculating construction vibration, construction vibration was measured from the center of the project site. The nearest structure of concern to the construction site is a building located on the Paradise High School campus.

Based on the representative vibration levels presented for various construction equipment types in Table 12 and the construction vibration assessment methodology published by the FTA (2018), it is possible to estimate the potential project construction vibration levels. As shown in Table 13, *Project Construction Vibration Levels at 250 Feet*, the nearest structures at 250 feet from the construction site would not experience groundborne levels in exceedance of standards. Therefore, the proposed project would not result in the generation of excessive groundborne vibration or groundborne noise levels. Impacts would be less than significant, and no mitigation measures are necessary.

Table 13 Project Construction Vibration Levels at 250 Feet

Receiver PPV Levels (in/sec)[1]										
Large Bulldozer	Pile Driver	Drilling	Loaded Trucks	Rock Breaker	Jack-hammer	Small Bulldozer	Peak Vibration	RMS Velocity Levels[2]	Threshold	Exceed Threshold?
0.002	0.005	0.002	0.002	0.002	0.001	0.000	0.005	0.0035	0.01	**No**

Notes:
[1] Based on the Vibration Source Levels of Construction Equipment included on Table 5-3 (FTA 2018).
[2] 2Vibration levels in PPV are converted to RMS velocity using a 0.70 conversion factor identified by Caltrans (2020)
Source: Appendix F.

Operational Groundborne Vibration

The operation of the new school would not include any long-term vibration sources. Thus, no significant vibration effects from operations sources would occur.

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

No Impact. The project site is not within an airport land use plan and there are no public airports or private airstrips within two miles of the site. The nearest airport to the project site is the Paradise Airport, approximately 3.2 miles to the south. Therefore, no impact would occur, and no mitigation measures are necessary.

3.14 POPULATION AND HOUSING

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)?

No Impact. The proposed project involves the development of a new continuation school campus. The proposed project is intended to serve the existing and anticipated future student population and would not result in the creation of housing or infrastructure that would induce unplanned population growth in the area. No increase in enrollment is anticipated. Therefore, no impact to population and housing would occur and no mitigation measures are necessary.

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

No Impact. As shown in Figure 3, the project site consist of vacant land and an existing school parking lot. Therefore, Project development would not displace housing or people. No impact would occur and no mitigation measures are necessary.

3.15 PUBLIC SERVICES

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

3. Environmental Analysis

a) Fire protection?

Less Than Significant Impact. Fire prevention, fire protection, and emergency medical services in the project area are provided by Paradise Fire & Rescue Department with cooperative agreement with CAL FIRE. The nearest fire station to the project site is Station 81 at 767 Birch Street, , approximately 0.85 miles to the southwest. The proposed project may cause a very slight increase in demands for fire protection and emergency medical service. However, considering the existing firefighting resources available in and near the Town, project impacts on fire protection and emergency services (including response times) are not expected to occur. Additionally, in the event of an emergency at the project site that required more resources than Fire Station 81 could provide, Paradise Fire & Rescue Department would direct resources to the site from other Town's stations nearby and, if needed, would request assistance from other nearby fire departments. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

b) Police protection?

Less Than Significant Impact. Law enforcement services in the area are provided by the Paradise Police Department (PPD). PPD is headquartered at 5595 Black Olive Drive, approximately 0.85 miles to the southwest. The proposed project may cause a very slight increase in demands for police services during construction due to possible trespass, theft, and/or vandalism. Active construction areas would be fenced, and any increase in demand for police would be temporary and would not require construction of new or expanded police facilities. The proposed project would not increase student population in the District and would not result in new adverse impacts on existing police service. Additionally, in the event of an emergency at the project site that required more resources than PPD could provide, PPD would request assistance from other nearby fire departments. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

c) Schools?

No Impact. School services are related to the size of the residential population, the geographic area served, and community characteristics. The proposed project would not increase the population in the attendance boundary or otherwise increase demand for school services. The proposed project would not result in changes in land uses (e.g., housing) that would result in population growth or create a greater demand for school services. Therefore, no impact would occur, and no mitigation measures are necessary.

d) Parks?

No Impact. Impacts to public parks and recreational facilities are generally caused by population or employment growth. The proposed project would not increase population or significantly increase employment. The proposed project would not result in the increased demand for additional parks and recreation services either on-site or in the surrounding area. Therefore, physical impacts to parks and recreation from increased population growth would not occur. No impacts to parks would occur and no mitigation measures are necessary.

e) Other public facilities?

No Impact. The proposed project would not result in impacts associated with the provision of other new or physically altered public facilities (e.g., libraries, hospitals, childcare, teen or senior centers). Physical impacts to public services are usually associated with population in-migration and growth, which increase the demand for public services and facilities. The proposed project is designed to serve the existing and future student population at Ridgewood High School. No new population would be generated by the proposed uses; therefore, no increased demand on other public facilities is anticipated. No impacts to other public facilities would occur and no mitigation measures are necessary.

3.16 RECREATION

f) 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. The Town of Paradise owns and manages nine public parks with a combined acreage of 73 acres: Billie Park, Coutolenc Park, Crain Memorial Park, Aquatic Park and Rotary Grove Park, Ball Parks, Recreation Center, Paradise Reservoir, and Paradise Memorial Park. The Town uses a level of service standard to calculate park improvement impact fees—3 acres per 1,000 residents—the same ratio specified in the Quimby Act for park land acquisition (Paradise 1994). The project would not result in an increase in population. Therefore, the construction of new park space or other town recreational facilities would not be required. There would be no impact related to the physical deterioration of existing recreation parks or other recreational facilities.

g) 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. The proposed project would not require the construction or expansion of offsite recreational facilities. Furthermore, the proposed project would neither increase population through construction of homes nor induce population growth that would require expanded recreational facilities therefore there is no impact.

3.17 TRANSPORTATION

The analysis in the section is based partly on the following technical studies which are included as Appendix G to this Initial Study.

- *Traffic/Transportation Technical Study for Ridgeview High School*, Headway Transportation, LLC, 2020, December 4.

Would the project:

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

Less Than Significant Impact.

3. Environmental Analysis

Impacts to Roadway Facilities

Roadways

Skyway is the main thoroughfare that connects Paradise and the "Upper Ridge" (Magalia, Stirling City, etc.) to Chico. Skyway is classified as a "Major Roadway" in the Butte County General Plan 2030. Through Paradise, Skyway generally has five lanes (two lanes in each direction and a two-way left-turn lane) with some sections that have fewer lanes. The posted speed limit in the project area is 30 mph.

Elliott Road is a two-lane, east-west minor roadway that connects Skyway to Sawmill Road. The posted speed limit on Elliott Road ranges from 25 to 30 mph. The speed limit at Maxwell Drive is 30 mph.

Maxwell Drive is a two-lane roadway that connects Elliott Road to Skyway. Maxwell Drive is primarily a north-south roadway that makes a 90-degree turn at the north end to intersect Skyway as the east leg of the intersection. The posted speed limit on Maxwell Drive is 25 mph.

Project Trip Generation

Trip generation was calculated based on rates in the ITE Trip Generation Manual (10th edition) and the trip generation for high school land uses (ITE Land Use Code 530) was used. Table 14, *Project Trip Generation*, shows the proposed project trip generation. As shown, the proposed project is expected to generate 304 average daily trips, 78 trips during the AM peak hour; 50 trips during the PM peak hour. The trips would be made to the new location rather than to the existing school in Magalia.

Table 14 Project Trip Generation

Land Use	Unit	Daily	AM Peak Hour			PM Peak Hour[1]		
			In	Out	Total	In	Out	Total
High School	Students	2.03	67%	33%	0.52	32%	68%	0.33
Ridgeview High School	150 Students	304	52	56	78	16	34	50

[1] PM peak hour is from 2:00 PM to 3:00 PM (when school is dismissed).
Source: Headway 2020

VMT Analysis

As discussed in detail in Response 3.17(b), the proposed project would not result in an increase in enrollment or VMT per capita compared to existing/baseline conditions. Therefore, the proposed project would not result in a conflict with a program, plan, ordinance, or policy addressing the circulation system, including roadway facilities. Impacts would be less than significant, and no mitigation measures are necessary.

Impacts to Alternate Modes of Transportation Facilities

As shown in Figure 3, *Aerial Photograph*, pedestrian access to the project site would be provided via new internal walkways with accessible ramps and stairs leading to the main building entrances. There are currently no sidewalks surrounding the project site and only sidewalk along the west side of Maxwell Drive. The proposed project would not alter the existing public sidewalk.

There are currently both northbound and southbound bicycle lanes on Maxwell Drive for its entire length. Elliott Road does not have designated bicycle lanes, however there are wide shoulders on both sides of the roadway that could accommodate cycling from Skyway to Clark Road. Bicycle racks would be provided at the front of the entrance near the accessible parking space.

B-Line (Butte Regional Transit) provide public transit services within the vicinity of the project site. The following is a description of the bus routes passing near the project site:

- Route 31 provides service between Paradise and Oroville and runs along Clark Road, Wagstaff Road, and Skyway. Service is provided during the morning and evening peak commute periods, from 6:45 AM to 7:30 AM and from 5:05 PM to 6:00 PM Monday through Friday. According to the B-Line website, Route 31 service is temporarily suspended due to the Camp Fire.

- Route 40 provides service between Paradise and Chico and runs along Clark Road, Wagstaff Road, Pearson Road, and Skyway. Service is provided from 5:50 AM to 7:00 PM Monday through Friday and from 9:45 AM to 6:00 PM on Saturday. Sunday service is not provided.

- Route 41 provides service between Paradise Pines (Magalia) and Chico and runs along Skyway. Service is provided from 6:00 AM to 7:30 PM Monday through Friday, from 7:50 AM to 7:00 PM on Saturday, and from 9:50 AM to 6:00 PM on Sunday. According to the B-Line website, Routes 40 and 41 are running on a modified schedule due to the Camp Fire.

During construction, the project may have the potential to increase safety hazards due to construction vehicles entering and exiting the project site (e.g., for delivery of building materials). Signage and/or workers conducting traffic would be present to direct pedestrians.

The proposed project would provide means for alternative transportation and would be accessible by public transportation for employees. As such, the proposed project would not result in a conflict with a program, plan, ordinance, or policy addressing the alternate mode of transportation facilities. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

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

Less Than Significant Impact. OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018 states, "If existing models or methods are not available to estimate the vehicle miles traveled for the particular project being considered, a lead agency may analyze the project's vehicle miles traveled qualitatively. Such a qualitative analysis would evaluate factors such as the availability of transit, proximity to other destinations, etc. For many projects, a qualitative analysis of construction traffic may be appropriate."

Although Butte County has established a travel demand model, the Town of Paradise has changed significantly since the model was built due to the Camp Fire in 2018. A significant portion of the town was destroyed by the fire, dramatically reducing traffic volumes; therefore, the model no longer represents traffic and travel patterns accurately. Lacking established thresholds, measurement methods, and a model for quantitative analysis, a qualitative analysis is used instead.

3. Environmental Analysis

The proposed project is not a new continuation high school, but a relocation of the existing Ridgeview High School. Ridgeview High School is currently located in Magalia, approximately 3.5 miles northeast of the project site. Since Ridgeview High School is not a new high school and the enrollment is not expected to increase due to the relocation, new vehicle trips and new VMT would not be created in the region. Additionally, the high school is currently located in Magalia, farther from the urbanized area of Paradise, on a two-lane rural roadway with no bicycle or pedestrian amenities. Relocating Ridgeview High School to a location more central to the urbanized area of Paradise would create shorter trips for most students and parents and therefore reducing VMT. Additionally, Maxwell Drive has bicycle lanes on both sides of the roadway, as well as sidewalks on the west side of the roadway which is more conducive to active transportation modes. Per OPR, the location of a project and proximity to non-auto mode facilities are key elements of VMT management. Both aspects are improved by the new school location.

Moreover, OPR's Technical Advisory on Evaluating Transportation Impacts in CEQA, December 2018 states, "Where a project replaces existing VMT-generating land uses, if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact." Based on the preceding, the proposed project would not result in an increase in VMT per capita compared to existing/baseline conditions. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

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

No Impact. As shown in Figure 3, *Aerial Photograph*, vehicular access for the project site would be provided at Pleasant Lane. Parents and students would use the drop-off loop at Paradise High School (on the west side of Maxwell Drive) or the parking lot south of the project site. There is an existing crosswalk on Maxwell Drive south of the drop-off loop entrance and north of Pleasant Lane that would provide access from the existing drop-off loop to Ridgeview High School. Design and construction of the proposed access and circulation improvements would be required to adhere to the Town's engineering standards, which are imposed on development projects during the Town's development plan review process. For example, at intersections and project driveways, a substantially clear line of sight must be maintained between the driver of a vehicle waiting at the crossroad, and the driver of an approaching vehicle. Sight distance is the continuous length of roadway visible to the driver. Based on a review of the proposed site plan (see Figure 3) and Google Earth maps, there are no restrictions blocking views from the driveways on Pleasant Lane and east- and west traffic on these roadways, and sufficient sight distance would be provided. Compliance with the established design standards and recommendation in the traffic study would ensure that hazards due to design features would not occur and that the placement of the vehicular access and circulation improvements would not create a conflict for motorists, pedestrians, or bicyclists traveling within or around the project site.

Furthermore, the proposed project does not include incompatible uses such as farm equipment on area roadways. Therefore, no impact resulting from hazards due to design features or incompatible uses would occur, and no mitigation measures are necessary.

d) Result in inadequate emergency access?

Less Than Significant Impact. As outlined above, vehicular access for the project site would be provided at Pleasant Lane. To address emergency and fire access needs, the improvements would be required to be designed in accordance with all applicable DSA and Paradise Fire & Rescue Department design standards for emergency access (e.g., minimum lane width and turning radius). Implementation of the proposed project would not require major road closures or otherwise impact the functionality of Maxwell Drive and Pleasant Lane as a public safety access route. Therefore, the proposed project would not result in inadequate emergency access. Impacts would be less than significant, and no mitigation measures are necessary.

3.18 TRIBAL CULTURAL RESOURCES

a) Would the project 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 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

Less Than Significant Impact. The project site is not listed or eligible for listing in the California Register of Historical Resources or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k). As discussed in Section 3.5, Cultural Resources, the potential to discover an unknown tribal cultural resource within the project site is unlikely given the developed nature of the site and archaeological records. If any tribal cultural resource is found on the project site, excavation will be halted, mitigation measure CUL-1 shall be implemented as necessary and the Native American Heritage Commission (NAHC) will be contacted. As the property has been previously disturbed, it is not anticipated that unknown tribal cultural resources are present on-site. Impacts would be 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 Impact. As of July 1, 2015, California Public Resources Code Sections 21080.1, 21080.3.1, and 21080.3.2 require public agencies to consult with California Native American tribes recognized by the NAHC for the purpose of mitigating impacts to tribal cultural resources. This law does not preclude agencies from initiating consultation with the tribes that are culturally and traditionally affiliated with their jurisdictions.

In accordance with Public Resources Code Section 21080.1(d), a lead agency is required to provide formal notification of intended development projects to Native American tribes that have requested to be on the lead agency's list for receiving such notification. The formal notification is required to include a brief

description of the Proposed Project and its location, lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation for tribal cultural resources. The Torres Martinez Desert Cahuilla Indians and the Gabrieleño Band of Mission Indians–Kizh Nation are on the District's notification list pursuant to AB 52. As of the time of the publication of this Mitigated Negative Declaration, neither the Torres Martinez Desert Cahuilla Indians, nor the Gabrieleño Band of Mission Indians–Kizh Nation have contacted the District, and as such, no consultation has been in initiated.

No evidence or readily available records exist to indicate that tribal cultural resources were identified during prior disturbance and development of the project site, and it is unlikely that any such resources would be uncovered or affected during project-related grading and construction activities. If any tribal cultural resource is found on the project site, excavation will be halted, mitigation measure CUL-1 shall be implemented as necessary and the NAHC will be contacted. As the property has been previously disturbed, it is not anticipated that unknown tribal cultural resources are present on-site. Impacts would be less than significant.

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

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

Less Than Significant Impact.

Water Treatment Facilities

Paradise Irrigation District (PID) would provide potable water to the project site. PID obtains its water supplies from Little Butte Creek and a District owned groundwater well (PID 2016). The proposed project involves the construction of a new Ridgecrest High School that would serve current and future students living in the region. It would not generate an increase in District student population or water treatment demands in the PID service area. Students would be already be attending schools in the local area and using water that requires treatment; therefore, the overall demand for water treatment would not increase. Additionally, PID estimates that it will have sufficient water supplies to meet proposed growth for normal, single-dry, and multiple-dry years (PID 2016). The proposed project would not require the relocation or construction of new or expanded water treatment facilities. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

Wastewater Treatment Facilities

The Town of Paradise does not have a central sewer system and relies on individual septic systems for wastewater disposal. The proposed project would not increase overall District enrollment, and thus would not expand total treatment demands within the Town. There is an existing wastewater collection, treatment and dispersal system located at Paradise High School. The primary treated wastewater flows to a recirculation tank for treatment through multiple passes, providing secondary treated effluent. This secondary treated effluent

then flows to existing dosing tanks that send the effluent to existing dispersal (leach) fields 1 through 6 on the main campus and two large fields (Zone A and B) on the east side of Maxwell Drive. The proposed project would include an approximate 50% reduction of dispersal field Zone A and retaining 100% of Zone B to serve the existing high school and the proposed school under the proposed project. Preliminary calculations show the remaining dispersal fields in Zones A and B have the capacity to serve up to 750 students combined from both Paradise and Ridgeview High Schools. Wastewater from the project site would be collected in a septic tank with the septic tank effluent delivered via pressure sewer to the existing treatment area on the Paradise High School campus. The proposed project would be served by an existing septic system and would not require the relocation or construction of new or expanded wastewater treatment facilities. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

Stormwater Drainage Facilities

See response to Section 3.10.c.iii, above. As substantiated in this section, impacts would be less than significant, and no mitigation measures are necessary.

Electricity Facilities

Electrical needs to the project site would be provided by the Pacific Gas and Electric Company via existing infrastructure in the immediate area of the project site. Electric power uses under the proposed project will include indoor lighting, office and kitchen appliances, perimeter lighting, and security systems. All utility connections to the proposed project would be required to comply with applicable federal, state, and local regulations related to electric power supply. Therefore, relocation and expansion of existing facilities and construction of new facilities would not be required. Impacts would be less than significant, and no mitigation measures are necessary.

Natural Gas Facilities

Natural gas needs to the project site would also be provided by the Pacific Gas and Electric Company (PG&E) via existing infrastructure in the immediate area of the project site. Natural gas uses under the proposed project will include kitchen stoves, Heating Ventilation and Air Conditioning (HVAC) systems, and hot water heaters. Total natural gas supplies available to PG&E are forecast to remain constant at 3,116 million cubic feet per day (MMCF/day) from 2020 through 2035. Total natural gas consumption in PG&E's service area is forecast to decline slightly from 2,348 MMCF/day in 2018 to 2,190 MMCF/day in 2035 (CGEU 2018).

PG&E projects that it will have sufficient supplies to meet the demands in its service area. Therefore, the proposed project's natural gas demand is within PG&E' forecast increase and the proposed project would not require PG&E to obtain new or expanded natural gas supplies. Impacts would be less than significant, and no mitigation measures are necessary.

Telecommunication Facilities

Various private services, including Charter Spectrum, AT&T, DIRECTV, Xfinity, and Suddenlink, provide telecommunication services to the Town, including the project site. No changes to telecommunication facilities

would occur. Therefore, project development would not require the construction of new or expanded telecommunication facilities. Impacts would be less than significant, and no mitigation measures are necessary.

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. As substantiated above in Section 3.19.a., PID will have adequate water supplies to meet water demands in its service area through 2040 during normal, dry, and multiple dry years (PID 2016). Additionally, the proposed project's landscaping would be required to comply with Chapter 15.36 (Landscapes Materials) of the Town of Paradise Code of Ordinances, which sets landscape design standards for water-efficient, fire-resistant landscaping within the town and to maintain the rural, wooded atmosphere of the community. Therefore, impacts on water supplies due to project development would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. As substantiated above in Section 3.19.a, the proposed project would not increase overall District enrollment and would not expand total treatment demands within the Town. Project development would not require construction of new or expanded wastewater treatment facilities. Therefore, impacts would be less than significant, and no mitigation measures are necessary.

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. In 2018, 97 percent of solid waste generated in the City are disposed at Neal Road Recycling and Waste Facility (CalRecycle 2020a). Neal Road Recycling and Waste Facility is permitted to received 1,500 tons of solid waste per day and has a remaining capacity of 25,271,900 tons[8] (CalRecycle 2020b). Project operation is estimated to generate about 0.007 pounds per square feet per day, resulting in 79.5 pounds per day or 0.02 tons per day (Cal Recycle 2020c). The proposed project would result in a negligible amount of increase in solid waste. There is adequate landfill capacity in the region for project-generated solid waste, and project development would not require new or expanded landfills. Therefore, impacts to solid waste would be less than significant and no mitigation measures are necessary.

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

Less Than Significant Impact. The following federal and state laws and regulations govern solid waste disposal:

[8] A Volume-to-Weight conversion rate of 2,000 lbs/cubic yard (1 ton/cubic yard) for "Compacted - MSW Large Landfill with Best Management Practices" is used as per CalRecyle's 2016 Volume-to-Weight Conversion Factors

- **AB 939 (Chapter 1095, Statutes of 1989)**, the California Integrated Waste Management Act of 1989 required each city, county, and regional agency to develop a source reduction and recycling element of an integrated waste management plan that contained specified components, including a source reduction component, a recycling component, and a composting component. With certain exceptions, the source reduction and recycling components were required to divert 50 percent of all solid waste from landfill disposal or transformation by January 1, 2000, through source reduction, recycling, and composting activities.
- **AB 32 (Chapter 488, Statutes of 2006)**, the California Global Warming Solutions Act, established mandatory recycling as one of the measures to reduce GHG emissions adopted in the Scoping Plan by the California Air Resources Board.
- **AB 1327 (California Solid Waste Reuse and Recycling Access Act of 1991)** requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

Project-related construction and operation phases would be implemented in accordance with all applicable federal, state, and local laws and regulations govern solid waste disposal. Therefore, impact would be less than significant and no mitigation measures are necessary.

3.20 WILDFIRE

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?

Less Than Significant Impact. California Government Code Chapter 6.8 directs the California Department of Forestry and Fire Protection (CAL FIRE) to identify areas of very high fire hazard severity within Local Responsibility Areas (LRA). Mapping of the areas, referred to as Very High Fire Hazard Severity Zones (VHFHSZ), is based on data and models of potential fuels over a 30- to 50-year time horizon and their associated expected fire behavior and expected burn probabilities, which quantifies the likelihood and nature of vegetation fire exposure to buildings. LRA VHFHSZ maps were initially developed in the mid-1990s and are now being updated based on improved science, mapping techniques, and data. In 2008, the California Building Standards Commission adopted California Building Code Chapter 7A requiring new buildings in VHFHSZ to use ignition-resistant construction methods and materials.

Most of the Town of Paradise is located within a designated VHFHSZ; however, small portions of the town in the south and east are in a non-VHFHSZ. The project site is in a VHFHSZ within the LRA (CAL FIRE 2008). Development on the project site would be subject to compliance with the 2019 California Building Code (CBC). The Town of Paradise is covered under the Town of Paradise Emergency Operations Plan and the Butte County Local Hazard Mitigation Plan 2019. These plans provide guidance to effectively respond to any emergency, including wildfires. In addition, all proposed construction is required to meet minimum standards for fire safety. Implementation of these plans and policies in conjunction with compliance with the Fire Code would minimize the risk of loss due to wildfires.

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Furthermore, the proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project site and surroundings during construction and postconstruction. In addition, as with all projects in the Town of Paradise, conformance with the CBC and Fire Code, would be required. Therefore, impacts are considered less than significant.

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?

Less Than Significant Impact. The topography of the site is gently to sloped from the north/northwest to the south/southeast, with development planned throughout the site. The town does not have high-speed prevailing winds, and average wind speeds are approximately 6.6 miles per hour during the windier part of the year, from November to March (Weather Spark 2020).

Development of the site with the proposed improvements would reduce the amount of exposed vegetation that could be used as fuel on the site. Therefore, the project and site conditions would not contribute to an increase in exposure to wildfire risk. Additionally, development on the project site would be subject to compliance with the CBC. Moreover, the Town of Paradise is under the Butte County Local Hazard Mitigation Plan, which provides guidance to effectively respond to and mitigate emergencies, including wildfires. While the project site is within a VHFHSZ, conformance with the CBC and Fire Code, would be required. Therefore, impacts are considered less than significant.

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?

Less Than Significant Impact. The project site would require expansion of connection to utilities such as electricity and water. The project applicant is required to pay for connections and maintenance of onsite utility infrastructure. The utilities would be installed to meet service requirements. While the project site is within a VHFHSZ, the construction of infrastructure improvements for the project would not directly increase fire risk, and impacts are less than significant.

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?

Less Than Significant Impact. As discussed in Section 3.7 and 3.10 respectively, above, the project site is not within a landslide hazard area or a flood plain. Historical geographic mapping does not show any flooding or safety concerns caused by the drainage. Construction activities related to the proposed project would be subject to compliance with the CBC and would include BMPs. BMPs may include but are not limited to covering of the soil, use of a dust-inhibiting material, landscaping, use of straw and jute, hydroseeding, and grading. Therefore, with implementation of BMPs, impacts are less than significant.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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 Mitigation Incorporated. As substantiated in Section 3.4, *Biological Resources*, tree or vegetation removal may be required for the proposed project; therefore, the project could result in direct impacts on special-status plants and wildlife during construction. However, compliance with mitigation measures BIO-1 through BIO-4 would ensure that impacts to biological resources do not occur.

Furthermore, as substantiated in Section 3.5, *Cultural Resources*, no historic resources were identified onsite and, therefore, the project site does not have the potential to eliminate important examples of California history or prehistory. Additionally, due to the presence of alluvium along the Clear and Honey Run creeks, there is potential for undiscovered archaeological resources to be encountered during grading activities at the project site. Compliance with mitigation measure CUL-1 would ensure that impacts to archeological resources do not occur.

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. The issues relevant to project development are confined to the immediate project site and surrounding area. Additionally, the project site is in an area of the City where supporting utility infrastructure (e.g., water, wastewater, electricity, natural gas, and drainage) and services (e.g., solid waste collection) currently exist. Project implementation would not require the construction of new or expansion of existing utility infrastructure and services.

Furthermore, impacts related to other topical areas such as air quality, GHG, hydrology and water quality, and traffic would not be cumulatively considerable with development of the project in conjunction with other cumulative projects.

In consideration of the preceding factors, the project's contribution to cumulative impacts would be rendered less than significant; therefore, project impacts would not be cumulatively considerable.

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

Less Than Significant Impact. As discussed in the respective topical sections of this Initial Study, implementation of the proposed project would not result in significant impacts in the areas of GHG, geology and soils, hazards and hazardous materials, hydrology and water quality, noise, or wildfire, which may cause

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adverse effects on human beings. Therefore, impacts related to these environmental effects were deemed to be less than significant.

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4. References

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Appendices

Appendix A Air Quality & Greenhouse Gas Assessment

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Appendix B Biological Resources Assessment

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Appendix C Cultural Resources Inventory

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Appendix D Geotechnical Engineering and Geologic Hazards Report

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Appendix E Phase I Environmental Site Assessment

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Appendix F Noise Impact Assessment

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Appendix G Traffic/Transportation Technical Study

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