California Environmental Quality Act

Initial Study

Early Learning Center Project

(SCH No. 2023020521)

Lead Agency

Los Banos Unified School District

www.losbanosusd.org

Environmental Consultant

ODELL *Planning & Research, Inc.*

www.odellplanning.com

January 2024

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Executive Summary

The Los Banos Unified School District (District) is proposing to construct and operate the Early Learning Center Project (project) on 4.58 acres located at the southwest corner of East B Street and Place Road in the City of Los Banos, Merced County, California. The project will primarily serve Transitional Kindergarten (TK) students in the District and is needed as a result of the implementation of universal TK in California. The project will also serve Pre-K students. Facilities proposed as part of the project include five classroom buildings, an office/multi-purpose building, playground areas with shade structures, grass-turfed play areas, and other related hardscape and landscape features. The total number of classrooms is 19, of which 15 will be used for TK students and four will be used for Pre-K students. The project will serve 300 students, with 150 attending in the morning and 150 attending in the afternoon. The project will employ 52 faculty and staff. Construction of the project will begin in spring 2024 and is anticipated to be completed and operational by August 2025.

The conclusions of the Initial Study are as follows:

1. The Initial Study identified potentially significant environmental effects of the project in the following subject areas: aesthetics, air quality, cultural resources, greenhouses gas, noise, transportation, and tribal cultural resources. The District can avoid or reduce these impacts to a less than significant level by incorporating into the project the mitigation measures listed in Table 1 on the following pages.

2. The project would have a less than significant impact or no impact on many of the environmental resources and conditions evaluated in the Initial Study. The Initial Study explains why there would be no impacts, or why the impacts would be less than significant.

3. Based on items 1 and 2, above, the District should adopt a Mitigated Negative Declaration for the project.

Table 1
Mitigation Measures

Aesthetics: Mitigation Measures for Potential Lighting Impacts

AES-1: All parking area lighting shall have full cut-off type fixtures. A full cut-off type fixture is a luminaire or lighting fixture that, by the design of the housing, does not allow any light dispersion or direct glare to shine above a 90-degree horizontal plane from the base of the fixture. Full cut-off type fixtures must be installed in a horizontal position as designed.

AES-2: All external signs and lighting shall be lit from the top and shine downward except where uplighting is required for safety or security purposes. The lighting shall also be, as much as physically possible, contained to the target area.

AES-3: Exterior building lighting for security or aesthetics shall be a full cut-off or a shielded type design to minimize any upward distribution of light.

AES-4: Non-essential lighting shall be turned off by 10:00 p.m.

Air Quality: Mitigation for the Potential Impact of Construction Emissions on Sensitive Receptors:

AQ-1. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:

a. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,

b. Shall not operate a diesel-fueled auxiliary power system to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.

AQ-2. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use off-Road Diesel regulation. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: www.arb.ca.gov/msprog/truck-idling/2485.pdf and ww.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.

AQ-3. Signs shall be posted at the project site construction entrance to remind drivers and operators of the state's 5-minute idling limit.

AQ-4. To the extent available, replace fossil-fueled equipment with alternatively-fueled (e.g., natural gas) or electrically-driven equivalents.

AQ-5. Construction truck trips shall be scheduled, to the extent feasible, to occur during non-peak hours and truck haul routes shall be selected to minimize impacts to nearby residential dwellings.

AQ-6. The burning of vegetative material shall be prohibited.

AQ-7. The proposed project shall comply with SJVAPCD Regulation VIII for the control of fugitive dust emissions. Regulation VIII can be obtained on the SJVAPCD's website at website URL https://www.valleyair.org/rules/1ruleslist.htm. At a minimum, the following measures shall be implemented:

a. All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover.

b. All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.

c. All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.

d. With the demolition of buildings up to six stories in height, all exterior surfaces of the building shall be wetted during demolition.

e. When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.

f. All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.)

g. Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.

h. On-road vehicle speeds on unpaved surfaces of the project site shall be limited to 15 mph.

i. Sandbags or other erosion control measures shall be installed sufficiently to prevent silt runoff to public roadways from sites with a slope greater than one percent.

j. Excavation and grading activities shall be suspended when winds exceed 20 mph (Regardless of wind speed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation).

AQ-8. The above measures for the control of construction-generated emissions shall be included on site grading and construction plans.

Cultural Resources: Mitigation Measure for Potential Impacts to Subsurface Cultural Resources

CR-1.If cultural resources are encountered during ground disturbing construction activities, work shall stop in the immediate vicinity of the find and a qualified cultural resources specialist shall be consulted to determine the significance of the resources in accordance with CEQA Guidelines §15064.5. If potentially significant, the specialist shall make recommendations to the District on mitigation measures to be implemented to protect the discovered resources in accordance with CEQA Guidelines §15064.5 and Public Resources Code §21083.2. If human remains are encountered during ground disturbing activities, work shall stop in the immediate vicinity of the find and the County Coroner notified in accordance with Health and Safety Code §7050.5 and CEQA Guidelines §15064.5(e). If the remains are determined to be of Native American descent, the procedures and requirements set forth in CEQA Guidelines §15064.5(d) and (e) and Public Resources Code §5097.98 shall be implemented.

Greenhouse Gases: Mitigation Measures for Potential Impacts Due to Greenhouse Gas Emissions

GHG-1. Building mechanical equipment and appliances shall be electrically powered. The installation of natural-gas service/infrastructure shall be prohibited.

GHG-2. Meet current CALGreen Tier 2 standards for electric vehicle (EV) parking spaces, except that all EV parking spaces required by the code shall be "EV-capable" instead of "EV-Ready".

Noise: Mitigation Measures for Potential Impacts from Noise and Groundborne Vibration Due to Construction

NOI-1. Noise sources associated with construction shall be limited to between 7 a.m. and 9 p.m. on weekdays, and between 8 a.m. and 5 p.m. on weekends.

NOI-2. Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.

NOI-3. When not in use, all equipment shall be turned off and shall not be allowed to idle.

NOI-4. To the extent locally available, electrified, or alternatively powered construction equipment shall be used.

NOI-5. Construction equipment staging areas shall be located at the furthest distance possible from nearby noise-sensitive land uses.

Transportation: Mitigation Measures for Potential Impacts to Traffic Level of Service and On-Site Congestion

TR-1: The District shall pay a pro-rata fair share for the traffic improvements listed in Table 17-1, except for the Las Palmas Street/Main Access at B Street improvements, which shall be 100% the responsibility of the District.

TR-2: The District shall operate the project such that there is at least 30 minutes between the AM and PM sessions, and parents in the PM session shall not be allowed to drop off their children more than 15 minutes prior to the start of the session.

Tribal Cultural Resources: Mitigation Measures for Potential Impacts to Subsurface Tribal Cultural Resources

TC-1. Prior to starting construction on the project, the District shall contact the Santa Rosa Rancheria Tachi-Yokut Tribe to arrange for a tribal monitor or observer to be present at the project site during-ground disturbing construction and preconstruction activities.

TC-2. If tribal cultural resources are discovered during ground-disturbing activities, work shall stop in the immediate vicinity of the find and a qualified professional with expertise in tribal cultural resources shall be consulted to recommend an appropriate course of action in consultation with potentially affected tribes. If it is determined that the project may cause a substantial adverse change to a tribal cultural resource, mitigation measures to be considered should include those identified in Public Resources Code Section 21084.3**.**

A. Project Background Information

1. Project Title, Lead Agency, and Lead Agency Contact Information

Project Title: Los Banos Unified School District Early Learning Center Project
Lead Agency: Los Banos Unified School District
Contact: Sherry Munday
Facilities & Special Projects Manager
646 W. Pacheco Boulevard
Los Banos, CA 93635
Telephone: (209) 826-1936
Email: smunday@losbanosusd.k12.ca.us

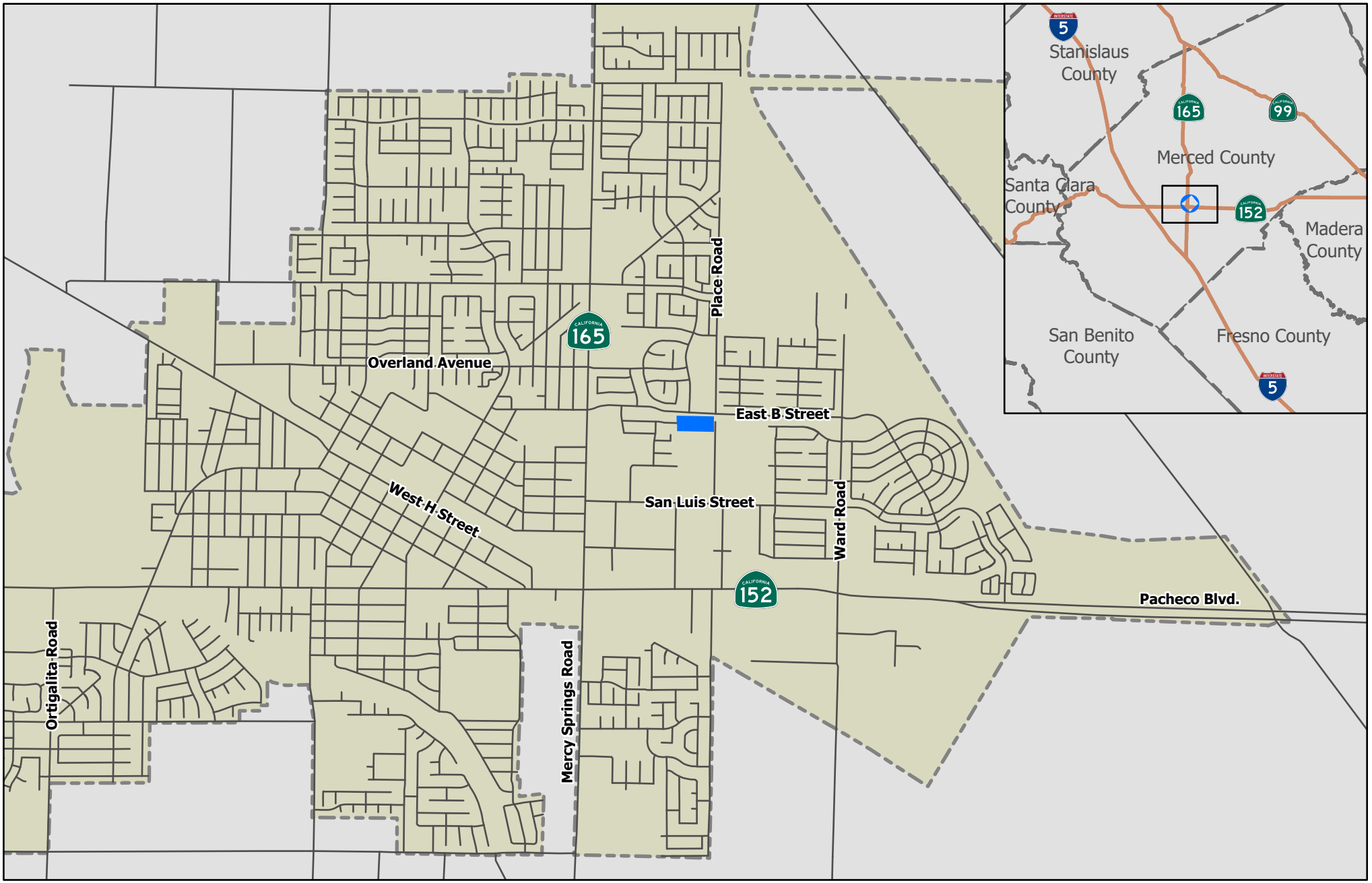
2. Project Location

The project site is located on approximately 4.58 acres at the southwest corner of East B Street and Place Road in the City of Los Banos (City[1]), Merced County, California. The site consists of vacant undeveloped land located at the northern end of a 28.3-acre parcel (APN 428-030-022). The Los Banos Junior High School campus is located immediately south of the project site on the same parcel. The regional location, site location, and site plan for the proposed project are included and are displayed in Figures 1, 2, and 3, respectively. Table 2 provides detailed site location information.

Table 2
Project Location

City	Los Banos
County	Merced
Zip Code	93635
Assessor's Parcel Number	APN 428-030-022
Nearest Existing Major Cross Streets	Place Road and East B Street
Elevation	About 118 AMSL
USGS Map	Los Banos
Section, Township & Range	Township 10S, Range 10E, Section 13
Latitude/Longitude	37°06'61"N -120°82'77"W

[1] Throughout this document the word "City" (capitalized) refers to the City of Los Banos governmental administration. The word "city" (lower case) refers to the geographic location or boundary of Los Banos.



Project Location

Figure 1

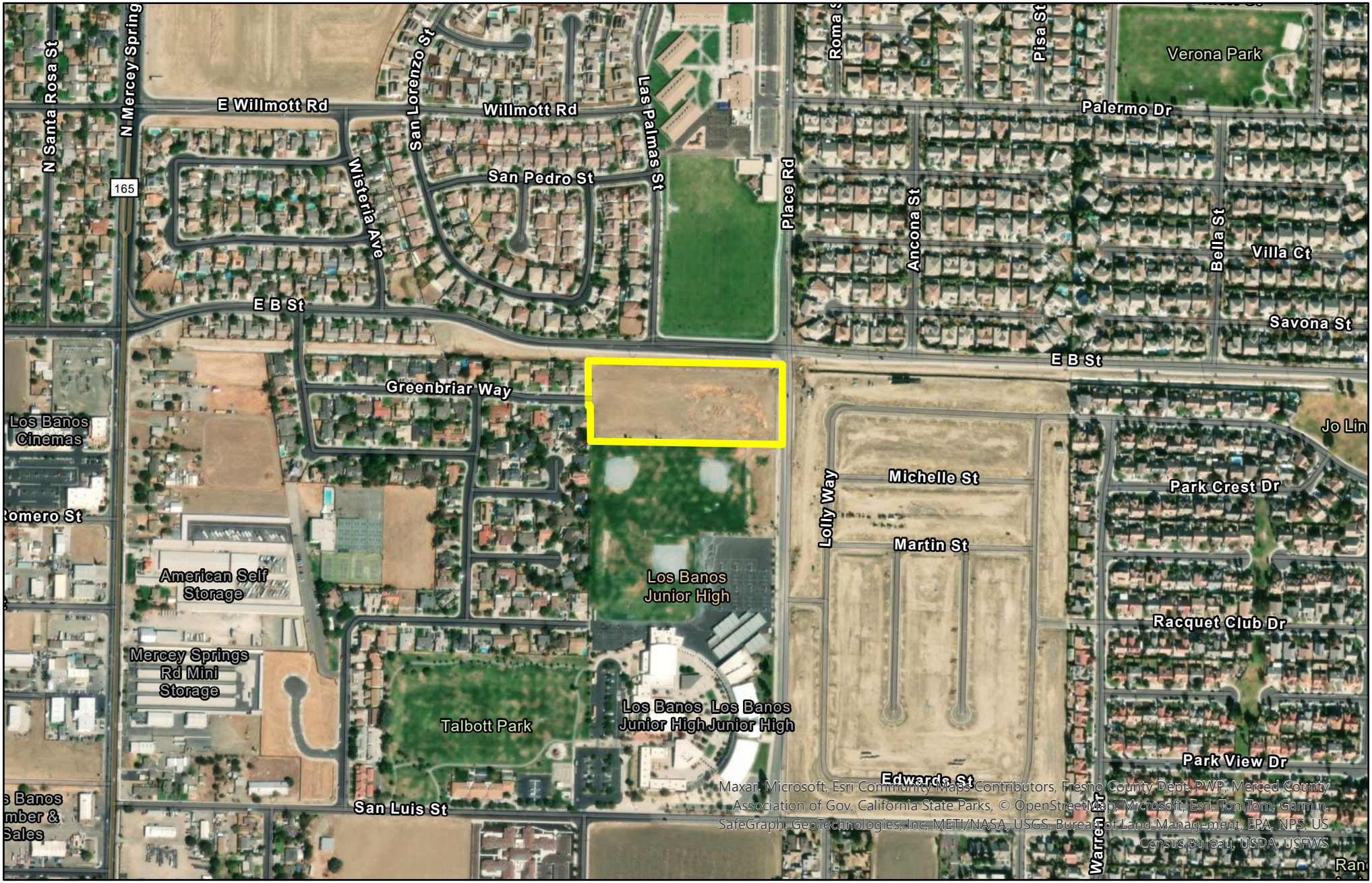
Early Learning Center Project
Los Banos Unified School District

ODELL *Planning & Research, Inc.*
Environmental Planning • School Facility Planning • Demographics

Los Banos City Limits
Project Site

0 1,000 2,000 4,000 Feet

N



Project Site

Figure 2

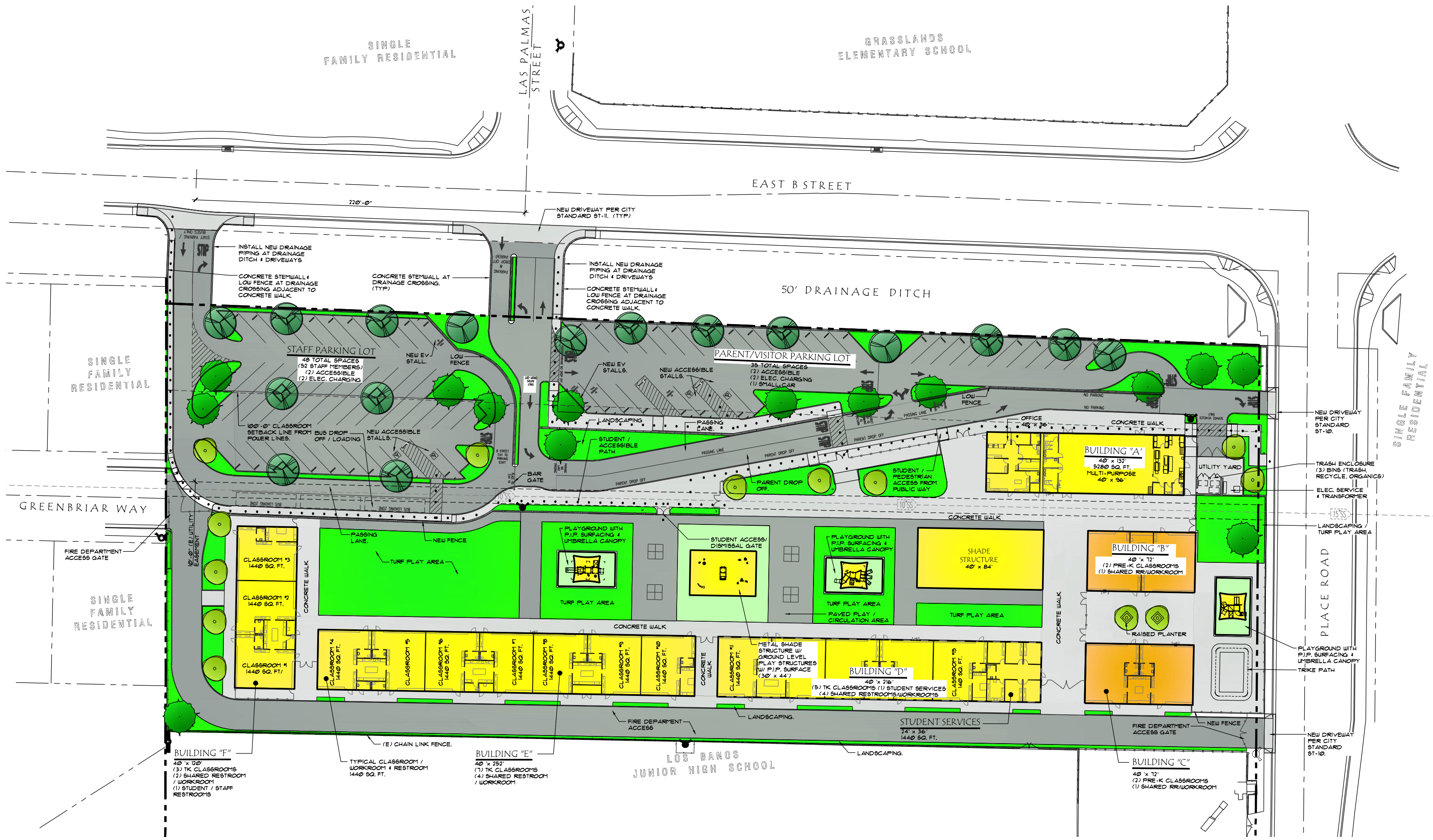
Early Learning Center Project
Los Banos Unified School District

ODELL *Planning & Research, Inc.*
Environmental Planning • School Facility Planning • Demographics

Project Site

N

1" = 500'



PRELIMINARY SITE PLAN FOR:

EARLY EDUCATION CENTER
LOS BANOS UNIFIED SCHOOL DISTRICT

EAST "B" STREET AND PLACE ROAD
LOS BANOS, CALIFORNIA

skw & associates
architecture • engineering • surveying
2257 scenic drive, modesto, ca 95355 p: 209•525•8823 f: 209•529•7804

JANUARY 2024
22M075

3. Project Description

The Los Banos Unified School District (District) is proposing to construct and operate the Early Learning Center Project (project). The project will primarily serve Transitional Kindergarten (TK) students in the District and is needed as a result of the implementation of universal TK in California. The project will also serve Pre-K students. Facilities proposed as part of the project include five classroom buildings, an office/multi-purpose building, playground areas with shade structures, grass-turfed play areas, and other related hardscape and landscape features. The total number of classrooms is 19, of which 15 will be used for TK students and four will be used for Pre-K students. The project will serve 300 students, with 150 attending in the morning and 150 attending in the afternoon. The project will employ 52 faculty and staff.

The project site plan (Figure 3) shows three vehicular access points to the site. The first access point would be located along the south side of B Street at the western boundary of the project site. This access point is intended for employees and school buses and would be limited to right-in right-out movements. This access point would provide access to the 48-space staff parking lot and the bus drop-off area. The second access point would be located along the south side of B Street aligned with Las Palmas Street. This access point is intended for parent/visitor use and would be a full access point with left and right turn movements. This access point would provide access to the 35-space parent visitor parking lot and the parent drop-off area. The third access point would be located along the west side of Place Road approximately 200 feet south of B Street. This access point is intended as an exit for parents and visitors and would be limited to right-out access. An emergency access lane is provided along the south side of the site, connecting Greenbriar Way west of the project site to Place Road east of the project site.

4. Actions Required to Implement Project

The District must undertake the following actions to implement the project:

- Complete the California Environmental Quality Act process for the project by adopting a Mitigated Negative Declaration for the project
- Adopt and implement the Mitigation Monitoring and Reporting Program identified in Section F of this Initial Study
- Approve the project
- Complete the California Department of Education school site approval process.

5. Project Schedule

Construction of the project will begin in spring 2024 and is anticipated to be completed and operational by August 2025.

6. Project Setting

a. Existing Land Uses

The project site is vacant. Residential development surrounds the proposed project site. Two schools, Los Banos Junior High School and Grasslands Elementary School are located immediately south and north, respectively. Elena Talbot Park is located southwest of the project site.

b. Public Land Use Policy

The City of Los Banos General Plan 2042 Land Use Element (General Plan) (City of Los Banos 2022a) designates the project site for Civic/Institutional use.

c. Zoning

The project site is zoned P-F, Public Facilities.

d. Streets and Highways

The site is bounded by East B Street to the north and Place Road to the east. East B Street is designated as a Minor Arterial in the General Plan Circulation Element and Place Road is designated as a Collector.

e. Public Utilities and Services

The project site is within the City of Los Banos and will be served by existing water and sewer facilities that serve the residential neighborhoods around the project site. Pacific Gas & Electric (PG&E) provides electricity and natural gas within the city. In 2020, the City joined the Peninsula Clean Energy (PCE) joint-powers agency to provide electricity generated from renewable sources, such as solar, wind, biomass, bio-waste, geothermal, and hydroelectric, which was delivered to customers through PG&E transmission lines.

f. *Police and Fire*

The Los Banos Police Department will provide law enforcement services and the Los Banos Fire Department will provide fire protection services.

g. *Transit*

Local transit in Los Banos is provided by The Bus, which is operated by the transit Joint Powers Authority for Merced County. Currently, Los Banos is served by one commuter route that connects Los Banos to Dos Palos, El Nido, and Merced. A microtransit system, known as The Micro Bus, also serves the region and connects Los Banos to Santa Nella and Gustine.

7. Request for Preliminary Comment

The District distributed a Request for Preliminary Comment (Request) for the proposed project on February 21, 2023, to responsible agencies and other public agencies that might have an interest in the project. The Request provided an opportunity for the agencies to comment on the potential environmental effects of the project, including whether an Environmental Impact Report, Mitigated Negative Declaration, or Negative Declaration should be prepared for the project. The District also sent the Request to residents and property owners in the project vicinity. Following AB 52 and California Public Resources Code Section 21080.3.1(d), tribal notification letters were sent to the following tribes on March 24, 2023: Amah Mutsun Tribal Band, Dumna Wo-Wah Tribal Government, North Valley Yokuts Tribe, Santa Rosa Rancheria Tachi Yokut Tribe, Southern Sierra Miwuk Nation, Tule River Indian Tribe, and Wuksache Indian Tribe/Eshom Valley Band. Table 3 presents the names of agencies, interested parties and tribes that submitted comments. The responses have been taken into consideration in the analysis presented in this Initial Study.

Table 3
Agency, Tribal, and Public Comments in Response to Request for Preliminary Comment

Name of Agency, Tribe, Interested Party	Comment
City of Los Banos	Initial Study should evaluate: • Noise • Light Pollution • Storm Drainage • Water • Traffic
San Joaquin Valley Air Pollution Control District	Provided information regarding the following: • Project Related Emissions • Health Risk Screening/Assessment • Ambient Air Quality Analysis • Vegetative Barriers and Urban Greening • Clean Lawn and Garden Equipment in the Community • On-Site Solar Development • Electric Vehicle Chargers • District Rules and Regulations
Santa Rosa Rancheria Tachi Yokut Tribe	Requested the following: • Perform an archaeological survey and have the results sent to the tribe • Perform archaeological record search and send the results to the tribe • Perform a SLF search through the NAHC and send the results to the tribe • Provide a cultural resource monitor on site for any ground disturbance related to the project
Jaclyn and Michael Ritchie	Expressed Concern for the Following: • Traffic Congestion • Location of Parking/Drop-Off Area

8. Other Public Agencies Whose Approval is Required

Implementation of the proposed project would require approvals from other public agencies, as follows:

California Department of Education: Review and approve proposed school for conformance with applicable state rules and regulations governing the siting and development of public schools.

California Department of Toxic Substances Control: Review and approve compliance with Education Code Sections 17213.1 and 17213.2, ensuring there are no toxic substances on the site that could be a hazard to students and staff on the site.

City of Los Banos: review and approve the location, design, and construction of water, sewer, and street improvements..

Merced County Environmental Health Division: Review and approve any food handling equipment and operations.

San Joaquin Valley Air Pollution Control District (SJVAPCD): Ensure compliance with applicable rules and regulations, including but not limited to Regulation VIII and Rule 9510 (Indirect Source Review).

B. Environmental Factors Potentially Affected

Based on the evaluations in Section E of this Initial Study, the project would have a less than significant impact on the environmental factors listed in Table 4. Those factors that require mitigation to be incorporated into the project to be less than significant are noted with an "X".

Table 4
Environmental Factors Potentially Affected

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

C. Determination

Based on this Initial Study, I find that the Early Learning Center Project could have significant effects on the environment, but mitigation measures incorporated in the project by the Los Banos Unified School District will avoid the effects or render them less than significant. Therefore, a Mitigated Negative Declaration is recommended for adoption.

Sypher Lee — Signature
1/19/24 — Date
Sypher Lee — Print Name
Assistant superintendent of Administrative Services — Title

D. Evaluation of Environmental Impacts

1. State CEQA Guidelines Appendix G Environmental Checklist

This Initial Study identifies and analyzes the potential impacts of the proposed project on the environmental resources and conditions listed in Appendix G in the California Environmental Quality Act Statute and Guidelines (CEQA Guidelines) and describes feasible mitigation measures that could be incorporated into the project to avoid the impacts or reduce them to an insignificant level and determines the significance of the impacts with or without mitigation. The environmental resources and conditions listed in Appendix G are categorized as follows: Aesthetics, Agricultural and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Energy, Geology and Soils, Greenhouse Gas Emissions, Hazards, and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation, Tribal Cultural Resources, Utilities, and Service Systems, Wildfire, and Mandatory Findings of Significance.

The discussion of each impact in Section E of this Initial Study concludes with a determination that the impact is potentially significant, less than significant with mitigation, less than significant, or does not involve any impact or no impact.

The "potentially significant" determination is applied if there is substantial evidence that an effect may be significant. Under the State CEQA Guidelines, a significant effect, or impact, on the environment means a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance (see Guidelines Section 15382). The District must prepare an Environmental Impact Report for the project if the Initial Study identifies one or more potentially significant impacts.

The "less than significant impact with mitigation incorporated" determination applies when the incorporation by the District of mitigation measures in the project would reduce an impact from potentially significant to less than significant. This Initial Study describes each mitigation measure the District has incorporated into the project to reduce potentially significant impacts to a less than significant level.

The "less than significant" determination applies when the project would not result in a significant effect on a resource or condition. The less-than-significant determination is used only in cases where no mitigation measures are required to reduce an impact to a less-than-significant level.

The "no impact" determination applies when the project would have no impact on a resource or condition, or the resource or condition does not apply to the project or its location.

The discussion of impacts in this Initial Study lists each potential impact as stated in Appendix G, provides an analysis of the impact, describes each mitigation measure required to avoid the impact or reduce it to a less than significant level, and concludes with a determination of the level of significance of the impact. References to documents that would provide background information on an impact are provided where applicable.

This Initial Study incorporates by reference all documents and other sources of information cited in the Evaluation of Environmental Impacts (Section E) and Sources Consulted (Section H).

2. Existing Laws, Regulations, Policies, and Mitigation Measures

Introduction: In some cases, an impact that might appear to be significant is less than significant because it is subject to state, regional, or local laws, regulations, or policies – the application of which will reduce the impact to a less-than-significant level. Preparation of this Initial Study included a review of applicable laws, regulations, and policies to determine if they would prevent or reduce the potentially significant impacts of the proposed project. The Initial Study does not cite the laws, regulations, and policies as mitigation measures because they would apply to the project regardless of the outcome of the Initial Study. For the proposed project, applicable laws, regulations, and policies include but are not limited to the following:

State of California

The selection and approval of a site for a public school in California are subject to numerous state rules and regulations, most of which the California Department of Education administers to protect the health and safety of students and staff at the school. Before the Department of Education will approve a school site and the school becomes eligible for state funding, a school district must certify that "the proposed site is suitable for educational purposes and is free or will be free before occupancy, from hazards that could be considered harmful to student and staff health and safety. The school district has complied with and will comply with all applicable laws and policies associated with the acquisition of the school site, including commitments for Department of Toxic Substances Control required activities…" (SFPD 4.03, 2). The state requirements include but are not limited to the following:

Education Code Section 17210-17224*:* Specifies the environmental review process the Department of Toxic Substance Control (DTSC) administers for new school sites. DTSC ensures that proposed school sites are free of contamination or if the properties were previously contaminated, that they have been cleaned up to a level that protects the students and staff who will occupy the new school. All proposed school sites that will receive State funding for acquisition or construction are required to go through a rigorous environmental review and cleanup process under DTSC's oversight.

Education Code Section 17212.5; California Code of Regulations, Title 5, Section 14010 Geological and Other Environmental Hazards Report: The District must prepare a Geological Hazards Report and other environmental hazards report as described in Appendix H of the School Site Selection and Approval Guide, 2000 Edition. This will include a survey of high-pressure pipelines, liquid storage tanks, railroads, airports, electrical transmission lines, and areas subject to flooding, dam inundation, seismic faulting, and liquefaction.

Education Code Section 17213, Public Resources Code Section 21151.8; and California Code of Regulations, Title 5, Section 14011[h],[i]; Title 14, Section 15093: Requires District Board to adopt findings stating: (1) the proposed school site is not a current or former waste disposal site; (2) the site is not a hazardous substance release site; (3) the site does not contain pipelines; and (4) whether a qualified freeway and/or qualified traffic corridor is located within 500 feet of the site. Board-adopted findings for hazardous air emitters and hazardous material handlers located within a 1/4 mile of the site are also required.

Education Code Section 17215 and California Code of Regulations, Title 21, Division 2.5, Chapter 2.1: airports: Requires providing notice to the State Department of Education if a proposed school site is within two nautical miles, measured by air line, of that point on an airport runway or a potential runway included in an airport master plan that is nearest to the site. The Department of Education is required to consult with the Department of Transportation as to the safety of the site concerning airport operations.

Public Resources Code Section 21151.2 and Government Code Sections 53094, 65402[c]: Requires consultation with the local Planning Commission to determine the compatibility of the proposed school site with the General Plan.

Public Resources Code Section 21151.4: Addresses CEQA consultation requirements for the proposed construction or alteration of a facility within one-quarter mile of the school that might reasonably be anticipated to emit or handling of hazardous or acutely hazardous material.

Title 5, California Code of Regulations, Article 2, Section 14010, Standards for School Site Selection*:* The standards address: possible hazards related to power line easements, railroads, airports, major streets, above-ground pipelines, underground pipelines, above-ground storage tanks, traffic, noise, seismicity, geology, soils, flooding, dam flood inundation, incompatible zoning, and other safety-related factors.

Title 24, California Code of Regulations, Part 1 through Part 12: Specifies the State of California building regulations for public schools. The Division of the State Architect is responsible for administering the regulations.

Central Valley Regional Water Quality Control Board

National Pollutant Discharge Elimination System (NPDES) Permit and Waste Discharge Requirements General Permit for Discharges from Municipal Separate Storm Sewer Systems (MS4) (Order No RS-2016- 0040, NPDES No CAS0085324).

San Joaquin Valley Air Pollution Control District

Regulation VIII – Fugitive PM10 Prohibitions and Regulation IX – Mobile and Indirect Sources.

E. Environmental Checklist

The questions in Section E, 1-20 are taken from the State CEQA Guidelines, Appendix G: Environmental Checklist Form, Evaluation of Environmental Impacts. The thresholds of significance used for this Initial Study are the same as the environmental issues listed in the Appendix G Checklist.

1. Aesthetics

Except as provided in Public Resources Code § 21099, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect on a scenic vista?			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 a 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 light and glare that would adversely affect day or nighttime views in the area?		X		

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

Scenic vistas within Merced County include views of the Coast Range and Sierra Nevada from the valley floor. According to the General Plan the project area is not considered a scenic vista. The project would not diminish views of any scenic features due to the flat topography, the distance from these features, and because its design characteristics (e.g., building height, size, and lighting) would be similar to the development existing in the vicinity of the project site. The impact is less than significant.

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

No Impact

The project site contains no trees, rock outcroppings, or historic buildings, and is not within a state scenic highway. The nearest state scenic highways are Interstate 5 north of State Route 152, and State Route 152 west of Interstate 5, approximately 7 miles to the west (Caltrans 2023). There is no impact.

c. In non-urbanized 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 a 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 zoned P-F, Public Facility, and is located in an urbanized area. Land uses surrounding the project site include public school facilities and single-family residences. Although the proposed project would change the visual character of the site, schools are a common and congruent visual feature within residential areas and may constitute an improvement compared to a vacant site. The impact is less than significant.

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

Less than Significant Impact with Mitigation Incorporated

The project will potentially increase light and glare in its vicinity. Project buildings and parking areas will be lit in the evenings for the safety and security of the students and staff. Headlights from vehicles arriving and departing the school during evening hours could be a potential source of glare from the project. However, all nearby residences are walled off from the street, so the light and glare from vehicles entering and leaving the site will be blocked. To ensure that adjacent land uses are not significantly impacted by on site lighting of building and parking areas, the following mitigation measures will be incorporated into the project.

AES-1: All parking area lighting shall have full cut-off type fixtures. A full cut-off type fixture is a luminaire or lighting fixture that, by the design of the housing, does not allow any light dispersion or direct glare to shine above a 90-degree horizontal plane from the base of the fixture. Full cut-off type fixtures must be installed in a horizontal position as designed.

AES-2: All external signs and lighting shall be lit from the top and shine downward except where uplighting is required for safety or security purposes. The lighting shall also be, as much as physically possible, contained to the target area.

AES-3: Exterior building lighting for security or aesthetics shall be a full cut-off or a shielded type design to minimize any upward distribution of light.

AES-4: Non-essential lighting shall be turned off by 10:00 p.m.

Significance after Mitigation

With the implementation of Mitigation Measures AEs-1 through AEs-4, this impact will be less than significant.

2. Agriculture and Forestry Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?				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, forestland, timberland, or timberland zoned Timberland Production?				X
d. Result in the loss of forestland or conversion of forestland to non-forest use?				X
e. Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of Farmland, to non-agricultural use or conversion of forestland to non-forest use?			X	

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
According to the State Farmland Mapping and Monitoring Program, the proposed project is located on land classified as "Urban and Built-Up Land" and is not located on soils classified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2023). There is no impact.

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

No Impact
The project site and surrounding land is not zoned for agricultural use and is not under a Williamson Act contract (DOC 2023). There is no impact.

c. Conflict with existing zoning for, or cause rezoning of, forestland, timberland, or timberland zoned timberland production?

No Impact
The project site is zoned for Public Facilities (P-F), and all land surrounding the site is developed with single family residences or schools. There is no impact.

d. Result in the loss of forestland or conversion of forestland to non-forest use?

No Impact
The site is not in an area where forestland resources exist. There is 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 forestland to non-forest use?

Less than Significant Impact

As noted above, the proposed project would be located on vacant land that is not in production for crops. The project site is surrounded by existing residential land uses and schools. Los Banos Junior High School is located adjacent and south of the proposed site and Grassland Elementary School is directly north. The site is designated for Civic/Institutional Use by the General Plan and zoned P-F (Public Facilities). Therefore, the project will have a less than significant impact.

3. Air Quality

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with or obstruct implementation of the applicable air quality plan?		X		
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment under an applicable federal or state ambient air quality?			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	

Background

An Air Quality and Greenhouse Gas Impact Analysis was prepared by Ambient Air Quality & Noise Consulting for this project and is included as Appendix 1 to this Initial Study. This Initial Study uses information from the analysis to evaluate the proposed project impacts.

The project is located within the San Joaquin Valley Air Basin (SJVAB). The SJVAB is within the jurisdiction of the San Joaquin Valley Air Pollution Control District (SJVAPCD). Air quality in the SJVAB is influenced by a variety of factors, including topography, local and regional meteorology.

The SJVAB occupies the southern half of the Central Valley. The SJVAB is open to the north and is surrounded by mountain ranges on all other sides. The Coast Ranges, which have an average elevation of 3,000 feet, are along the western boundary of the SJVAB, while the Sierra Nevada Mountains (8,000 to 14,000 feet in elevation) are along the eastern border. The San Emigdio Mountains, which are part of the Coast Ranges, and the Tehachapi Mountains, which are part of the Sierra Nevada, form the southern boundary, and have an elevation of 6,000 to 8,000 feet. The SJVAB is mostly flat with a downward gradient in terrain to the northwest.

The climate in the project area is semi-arid, with an annual normal precipitation of approximately 12.21 inches. Temperatures in the project area range from an average minimum of approximately 36 degrees Fahrenheit (°F), in January, to an average maximum of 97°F, in July.

Air Pollutants of Concern

For the protection of public health and welfare, the federal Clean Air Act (CAA) required that the Environmental Protection Agency (EPA) establish National Ambient Air Quality Standards (NAAQS for various pollutants. These pollutants are referred to as "criteria" pollutants because the EPA publishes criteria documents to justify the choice of standards. The following provides a summary discussion of the primary and secondary criteria for air pollutants of primary concern.

Ozone (O3) is a reactive gas consisting of three atoms of oxygen. In the troposphere, it is a product of the photochemical process involving the sun's energy. It is a secondary pollutant that is formed when Nitrous Oxides (NOX) and volatile organic compounds (VOC) react in the presence of sunlight. Ozone at the earth's surface causes numerous adverse health effects and is a criteria pollutant. It is a major component of smog. In the stratosphere, ozone exists naturally and shields Earth from harmful incoming ultraviolet radiation. High concentrations of ground-level ozone can adversely affect the human respiratory system and aggravate cardiovascular disease and many respiratory ailments. Ozone also damages natural ecosystems such as forests and foothill communities, crops, and some man-made materials, such as rubber, paint, and plastics.

Reactive Organic Gas (ROG) is a reactive chemical gas, composed of hydrocarbon compounds that may contribute to the formation of smog by their involvement in atmospheric chemical reactions. No separate health standards exist for ROG as a group. Because some compounds that make up ROG are also toxic, like the carcinogen benzene, they are often evaluated as part of a toxic risk assessment.

Volatile Organic Compounds (VOC) are hydrocarbon compounds that exist in the ambient air. VOCs contribute to the formation of smog and may also be toxic. VOC emissions are a major precursor to the formation of ozone. VOCs often have an odor, and some examples include gasoline, alcohol, and the solvents used in paints.

Total Organic Gases (TOGs) include all of the ROGs, in addition to low-reactivity organic compounds like methane and acetone. ROGs and VOC are subsets of TOG.

Oxides of Nitrogen (NOX) are a family of gaseous nitrogen compounds and are a precursor to the formation of ozone and particulate matter. The major component of NOX, nitrogen dioxide (NO2), is a reddish-brown gas that is toxic at high concentrations. NOX results primarily from the combustion of fossil fuels under high temperatures and pressure. On-road and off-road motor vehicles and fuel combustion are the major sources of this air pollutant.

Particulate Matter (PM), also known as particle pollution, is a complex mixture of extremely small particles and liquid droplets. The Environmental Protection Agency (EPA) groups particle pollution into three categories based on their size and where they are deposited:

- Inhalable coarse particles or Particulate Matter (PM) (PM2.5- PM10)," such as those found near roadways and dusty industries, are between 2.5 and 10 micrometers in diameter. PM2.5-10 is deposited in the thoracic region of the lungs.
- "Fine particles (PM2.5)," such as those found in smoke and haze, are 2.5 micrometers in diameter and smaller. These particles can be directly emitted from sources such as forest fires, or they can form when gases emitted from power plants, industries, and automobiles react in the air. They penetrate deeply into the thoracic and alveolar regions of the lungs.
- “Ultrafine particles (UFP),” are very small particles less than 0.1 micrometers in diameter largely resulting from the combustion of fossil fuels, meat, wood, and other hydrocarbons. While UFP mass is

a small portion of PM2.5, its high surface area, deep lung penetration, and transfer into the bloodstream can result in disproportionate health impacts relative to their mass.

Carbon Monoxide (CO) is an odorless, colorless gas that is highly toxic. It is formed by the incomplete combustion of fuels and is emitted directly into the air (unlike ozone). The main source of CO is on-road motor vehicles.

Sulfur Dioxide (SO2) is a colorless, irritating gas with a "rotten egg" smell formed primarily by the combustion of sulfur-containing fossil fuels.

Lead (Pb) is a metal that is a natural constituent of air, water, and the biosphere. Lead is neither created nor destroyed in the environment, so it essentially persists forever. The health effects of lead poisoning include loss of appetite, weakness, apathy, and miscarriage. Engines were a major source of airborne lead through the use of leaded fuels which has mostly phased out, with the result that ambient concentrations of lead have dropped dramatically.

Hydrogen Sulfide (H_2S) is associated with geothermal activity, oil and gas production, refining, sewage treatment plants, and confined animal feeding operations. Hydrogen sulfide is extremely hazardous in high concentrations; especially in enclosed spaces (800 ppm can cause death). Occupational Safety and Health Administration (OSHA) regulates workplace exposure to H_2S.

Other Pollutants

The State of California has established air quality standards for some pollutants not addressed by Federal standards. The Air Resource Board (ARB) has established State standards for hydrogen sulfide, sulfates, vinyl chloride, and visibility reducing particles. The following section summarizes these pollutants and provides a description of the pollutants' physical properties, health and other effects, sources, and the extent of the problems.

Sulfates (SO_4^{2-}) are the fully oxidized ionic form of sulfur. Sulfates occur in combination with metal and/or hydrogen ions. In California, emissions of sulfur compounds occur primarily from the combustion of petroleum-derived fuels (e.g., gasoline and diesel fuel) that contain sulfur. This sulfur is oxidized to SO2 during the combustion process and subsequently converted to sulfate compounds in the atmosphere. The conversion of SO2 to sulfates takes place comparatively rapidly and completely in urban areas of California due to regional meteorological features. The ARB sulfates standard is designed to prevent aggravation of respiratory symptoms. Effects of sulfate exposure at levels above the standard include a decrease in ventilator function, aggravation of asthmatic symptoms, and an increased risk of cardio-pulmonary disease. Sulfates are particularly effective in degrading visibility, and, due to the fact that they are usually acidic, can harm ecosystems and damage materials and property.

Visibility Reducing Particles: Are a mixture of suspended particulate matter consisting of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. The standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

Vinyl Chloride (C2H3Cl or VCM) is a colorless gas that does not occur naturally. It is formed when other substances such as trichloroethane, trichloroethylene, and tetrachloro-ethylene are broken down. Vinyl chloride is used to make polyvinyl chloride (PVC) which is used to make a variety of plastic products, including pipes, wire and cable coatings, and packaging materials.

Odors: Typically, odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from psychological (i.e., irritation, anger, or

anxiety) to physiological, including circulatory and respiratory effects, nausea, vomiting, and headache. Neither the state nor the federal governments have adopted rules or regulations for the control of odor sources.

Toxic Air Contaminants

Toxic Air Contaminants (TACs) are air pollutants that may cause or contribute to an increase in mortality or serious illness, or which may pose a hazard to human health. TACs are usually present in minute quantities in the ambient air, but due to their high toxicity, they may pose a threat to public health even at very low concentrations. Within California, TACs are regulated primarily through the Tanner Air Toxics Act (AB 1807) and the Air Toxics Hot Spots Information and Assessment Act of 1987.

Diesel Particulate Matter (DPM) is emitted from both mobile and stationary sources. In California, on-road diesel-fueled vehicles contribute approximately 40% of the statewide total, with an additional 57 percent attributed to other mobile sources such as construction and mining equipment, agricultural equipment, and transport refrigeration units. Stationary sources, contributing about 3 percent of emissions, include shipyards, warehouses, heavy equipment repair yards, and oil and gas production operations. Emissions from these sources are from diesel-fueled internal combustion engines. Stationary sources that report DPM emissions also include heavy construction, manufacturers of asphalt paving materials and blocks, and diesel-fueled electrical generation facilities.

Acetaldehyde is a federal hazardous air pollutant. It is directly emitted into the atmosphere or formed in the atmosphere as a result of photochemical oxidation. Sources of acetaldehyde include emissions from combustion processes such as exhaust from mobile sources and fuel combustion from stationary internal combustion engines. A majority of the statewide acetaldehyde emissions can be attributed to mobile sources, including on-road motor vehicles, construction, and agricultural equipment. The primary stationary sources of acetaldehyde are from fuel combustion from the petroleum industry.

Benzene is highly carcinogenic and occurs throughout California. A majority of benzene emitted in California (roughly 88 percent) comes from motor vehicles, including evaporative leakage and unburned fuel exhaust. These sources include on-road motor vehicles, recreational boats, off-road recreational vehicles, and lawn and garden equipment. Benzene is also formed as a partial combustion product of larger aromatic fuel components. To a lesser extent, industry related stationary sources are also sources of benzene emissions. The primary stationary sources of reported benzene emissions are crude petroleum and natural gas mining, petroleum refining, and electric generation that involves the use of petroleum products. The primary area sources include residential combustion of various types such as cooking and water heating.

1,3-butadiene: Most of the emissions of 1,3-butadiene are from incomplete combustion of gasoline and diesel fuels. Mobile sources account for the majority of the total statewide emissions.

Carbon tetrachloride: The primary stationary sources reporting emissions of carbon tetrachloride include chemical and allied product manufacturers and petroleum refineries. In the past, carbon tetrachloride was used for dry cleaning and as a grain-fumigant. Usage for these purposes is no longer allowed in the United States.

Hexavalent chromium: Sources of Hexavalent chromium include industrial metal finishing processes, such as chrome plating and chromic acid anodizing, and firebrick lining of glass furnaces. Other sources include mobile sources, including gasoline motor vehicles, trains, and ships.

Methylene Chloride is used as a solvent, a blowing and cleaning agent in the manufacture of polyurethane foam and plastic fabrication, and as a solvent in paint stripping operations. Paint removers account for the

largest use of methylene chloride in California, where methylene chloride is the main ingredient in many paint stripping formulations. Plastic product manufacturers, manufacturers of synthetics, and aircraft and parts manufacturers are stationary sources reporting emissions of methylene chloride.

Perchloroethylene is used as a solvent, primarily in dry cleaning operations. Perchloroethylene is also used in degreasing operations, paints and coatings, adhesives, aerosols, specialty chemical production, printing inks, silicones, rug shampoos, and laboratory solvents.

Asbestos is a term used for several types of naturally occurring fibrous minerals found in many parts of California. It is commonly found in ultramafic rock, including serpentine, and near fault zones. The amount of asbestos that is typically present in these rocks ranges from less than 1 percent up to about 25 percent, and sometimes more. Asbestos is released from ultramafic and serpentine rock when it is broken or crushed. This can happen when cars drive over unpaved roads or driveways which are surfaced with these rocks, when land is graded for building purposes, or at quarrying operations.

Valley fever is an infection caused by the fungus Coccidioides. The fungus is known to live in the dry alkaline soil found in the central valley. Coccidioides spores circulate in the air after contaminated soil and dust are disturbed by humans, animals, or the weather.

Would the project:

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

Less than Significant Impact with Mitigation Incorporated

Following the SJVAPCD-recommended methodology for the assessment of air quality impacts, projects that result in significant air quality impacts at the project level are also considered to have a significant cumulative air quality impact. Short-term construction and long-term operational emissions would not exceed applicable SJVAPCD-recommended significance thresholds. However, the proposed project could result in a significant contribution to localized PM concentrations for which the SJVAB is currently designated non-attainment. For this reason, implementation of the proposed project could conflict with air quality attainment or maintenance planning efforts. This impact would be considered potentially significant..

The following mitigation measures are included to reduce the conflict with air quality attainment or maintenance planning efforts by reducing localized PM concentrations**:**

AQ-1. On-road diesel vehicles shall comply with Section 2485 of Title 13 of the California Code of Regulations. This regulation limits idling from diesel-fueled commercial motor vehicles with gross vehicular weight ratings of more than 10,000 pounds and licensed for operation on highways. It applies to California and non-California based vehicles. In general, the regulation specifies that drivers of said vehicles:

a. Shall not idle the vehicle's primary diesel engine for greater than 5 minutes at any location, except as noted in Subsection (d) of the regulation; and,

b. Shall not operate a diesel-fueled auxiliary power system to power a heater, air conditioner, or any ancillary equipment on that vehicle during sleeping or resting in a sleeper berth for greater than 5.0 minutes at any location when within 1,000 feet of a restricted area, except as noted in Subsection (d) of the regulation.

AQ-2. Off-road diesel equipment shall comply with the 5-minute idling restriction identified in Section 2449(d)(2) of the California Air Resources Board's In-Use off-Road Diesel regulation. The specific requirements and exceptions in the regulations can be reviewed at the following web sites: www.arb.ca.gov/msprog/truck-idling/2485.pdf and ww.arb.ca.gov/regact/2007/ordiesl07/frooal.pdf.

AQ-3. Signs shall be posted at the project site construction entrance to remind drivers and operators of the state's 5-minute idling limit.

AQ-4. To the extent available, replace fossil-fueled equipment with alternatively-fueled (e.g., natural gas) or electrically-driven equivalents.

AQ-5. Construction truck trips shall be scheduled, to the extent feasible, to occur during non-peak hours and truck haul routes shall be selected to minimize impacts to nearby residential dwellings.

AQ-6. The burning of vegetative material shall be prohibited.

AQ-7. The proposed project shall comply with SJVAPCD Regulation VIII for the control of fugitive dust emissions. Regulation VIII can be obtained on the SJVAPCD's website at website URL https://www.valleyair.org/rules/1ruleslist.htm. At a minimum, the following measures shall be implemented:

a. All disturbed areas, including storage piles, which are not being actively utilized for construction purposes, shall be effectively stabilized of dust emissions using water, chemical stabilizer/suppressant, covered with a tarp or other suitable cover or vegetative ground cover.

b. All on-site unpaved roads and off-site unpaved access roads shall be effectively stabilized of dust emissions using water or chemical stabilizer/suppressant.

c. All land clearing, grubbing, scraping, excavation, land leveling, grading, cut & fill, and demolition activities shall be effectively controlled of fugitive dust emissions utilizing application of water or by presoaking.

d. With the demolition of buildings up to six stories in height, all exterior surfaces of the building shall be wetted during demolition.

e. When materials are transported off-site, all material shall be covered, or effectively wetted to limit visible dust emissions, and at least six inches of freeboard space from the top of the container shall be maintained.

f. All operations shall limit or expeditiously remove the accumulation of mud or dirt from adjacent public streets at the end of each workday. (The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions.) (Use of blower devices is expressly forbidden.)

g. Following the addition of materials to, or the removal of materials from, the surface of outdoor storage piles, said piles shall be effectively stabilized of fugitive dust emissions utilizing sufficient water or chemical stabilizer/suppressant.

h. On-road vehicle speeds on unpaved surfaces of the project site shall be limited to 15 mph.

i. Sandbags or other erosion control measures shall be installed sufficiently to prevent silt runoff to public roadways from sites with a slope greater than one percent.

j. Excavation and grading activities shall be suspended when winds exceed 20 mph (Regardless of wind speed, an owner/operator must comply with Regulation VIII's 20 percent opacity limitation).

AQ-8. The above measures for the control of construction-generated emissions shall be included on site grading and construction plans.

Significance after Mitigation
With the implementation of Mitigation Measures AQ-1 through AQ-8 , this impact would be considered less than significant.

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

Less than Significant Impact
The proposed project is located in the City of Los Banos, which is within the SJVAB. The SJVAB is designated nonattainment for the national 8-hour ozone and PM2.5 standards. On September 25, 2008, the U.S. EPA redesignated the San Joaquin Valley to attainment for the PM10 NAAQS and approved the PM10 Maintenance Plan (SJVAPCD 2019). Potential air quality impacts associated with the proposed project could potentially occur during project construction or operational phases. Short-term construction and long-term air quality impacts associated with the proposed project are discussed, as follows:

Short Term Construction Emissions
Short-term increases in emissions would occur during the construction phase. Construction-generated emissions are temporary, lasting only as long as construction activities occur, but have the potential to represent a significant air quality impact. The construction of the proposed project would result in the temporary generation of emissions associated with site preparation, grading, building construction, and paving. Short-term construction emissions would result in increased emissions of ozone-precursor pollutants (i.e., ROG and NOX), CO, and emissions of PM. Emissions of ozone-precursors would result from the operation of on-road and off-road motorized vehicles and equipment. Emissions of airborne PM are largely dependent on the amount of ground disturbance associated with site grading activities and can result in increased concentrations of PM that can adversely affect nearby sensitive land uses. Estimated construction-generated annual emissions associated with the proposed project are summarized in Table 7 of Appendix 1.

Construction of the proposed project would generate maximum annual emissions of approximately 0.24 tons/year of ROG, 1.62 tons/year of NOx, 1.70 tons/year of CO, 0.97 tons/year of PM10, and 0.5 tons/year of PM2.5. Estimated annual construction-generated emissions would not exceed the SJVAPCD's significance thresholds of 10 tons/year of ROG, 10 tons/year of NOx, 100 tons/year of CO, 27 tons/year of SOx, 15 tons/year PM10, or 15 tons/year PM2.5.

Estimated daily construction emissions are summarized in Table 8 of Appendix 1. Construction of the proposed project would generate maximum daily emissions of approximately 7.40 lbs/day of ROG, 36.0 lbs/day of NOx, 32.90 lbs/day of CO, 0.13 lbs/day of SO2, 42.60 lbs/day of PM10, and 23.14 lbs/day of PM2.5. Daily construction emissions would not exceed the SJVAPCD's recommended localized ambient air quality significance thresholds of 100 lbs/day for each of the criteria air pollutants evaluated.

Short-term construction of the proposed project would not result in a significant impact to regional or local ambient air quality conditions. Furthermore, it is important to note that project construction, including grading activities, would be required to comply with SJVPACD Regulation VIII (Fugitive PM10

Prohibitions). Mandatory compliance with SJVAPCD Regulation VIII would further reduce emissions of fugitive dust from the project site and minimize the project's potential to adversely affect nearby sensitive receptors. With compliance with SJVAPCD Regulation VIII, emissions of PM would be further reduced. For these reasons, construction-generated emissions would not be anticipated to result in a substantial increase in localized or regional pollutant concentrations that would have a significant adverse impact to public health. Given that project-generated emissions would not exceed applicable SJVAPCD significance thresholds, this impact would be considered less than significant.

Long-term Operational Emissions

Estimated annual operational emissions for the proposed project are summarized in Table 9 of Appendix 1. The proposed project would result in annual emissions of approximately 0.71 tons/year of ROG, 0.06 tons/year of NOX, 2.94 tons/year of CO, 0.01 lbs/day of SO2, 0.88 lbs/day of PM10, and 0.24 lbs/day of PM2.5. Estimated annual operational emissions would not exceed the SJVAPCD's significance thresholds of 10 tons/year of ROG, 10 tons/year of NOx, 100 tons/year of CO, 27 tons/year of SOx, 15 tons/year PM10, or 15 tons/year PM2.5.

Estimated daily operational emissions are summarized in Table 10 of Appendix XX. The proposed project would result in daily operational emissions of approximately 1.06 lbs/day of ROG, 0.43 lbs/day of NOX, 1.85 lbs/day of CO, 0.01 lbs/day of SO2, 0.07 lbs/day of PM10, and PM2.5. Operational emissions would be largely associated with mobile sources. Daily operational emissions would not exceed the SJVAPCD's recommended localized ambient air quality significance thresholds of 100 lbs/day for each of the criteria air pollutants evaluated. Long-term operation of the proposed project would not result in a significant impact to regional or local ambient air quality conditions. It is important to note that estimated operational emissions are conservatively based on the default vehicle fleet distribution assumptions contained in the model, which include contributions from medium and heavy-duty trucks. Mobile sources associated with schools typically consist largely of light-duty vehicles and buses. As a result, actual mobile-source emissions would likely be less than estimated. Given that project-generated emissions would not exceed applicable SJVAPCD significance thresholds, long-term operational activities would not be projected to violate or contribute substantially to existing or projected non-attainment conditions or associated adverse health impacts. This impact would be considered less than significant.

c. Expose sensitive receptors to substantial pollutant concentrations?

As previously noted, the nearest sensitive land uses located in the vicinity of the proposed project site consist predominantly of residential land uses. The nearest residential land uses are generally located along the western boundary of the project site. Long-term operational and short-term construction activities and emission sources that could adversely impact these nearest sensitive receptors are discussed, as follows:

Long-term Operation

Less than Significant Impact

Localized Mobile-Source CO Emissions: Carbon monoxide is the primary criteria air pollutant of local concern associated with the proposed project. Under specific meteorological and operational conditions, such as near areas of heavily congested vehicle traffic, CO concentrations may reach unhealthy levels. If inhaled, CO can be adsorbed easily by the blood stream and can inhibit oxygen delivery to the body, which can cause significant health effects ranging from slight headaches to death. The most serious effects are felt by individuals susceptible to oxygen deficiencies, including people with anemia and those suffering from chronic lung or heart disease. Mobile-source emissions of CO are a direct function of traffic

volume, speed, and delay. Transport of CO is extremely limited because it disperses rapidly with distance from the source under normal meteorological conditions. For this reason, modeling of mobile-source CO concentrations is typically recommended for sensitive land uses located near signalized roadway intersections that are projected to operate at unacceptable levels of service (i.e., LOS E or F). Localized CO concentrations associated with the proposed project would be considered less-than-significant impact if: (1) traffic generated by the proposed project would not result in deterioration of a signalized intersection to a LOS of E or F; or (2) the project would not contribute additional traffic to a signalized intersection that already operates at LOS of E or F. Based on the traffic analysis prepared for this project, the signalized intersection of Mercy Springs Road and East B Street would be projected to operate at LOS F under cumulative year 2044 conditions. However, with implementation of the proposed traffic improvements and recommendations, this intersection would operate at LOS D under future cumulative conditions (JLB 2023). For this reason and given the low background CO concentrations in the project area, the proposed project would not be expected to contribute substantially to localized CO concentrations that would exceed applicable standards. For this reason, this impact would be considered less than significant.

Toxic Air Contaminants: Based on information provided by the SJVAPCD, three existing stationary sources of TACS were identified within one-quarter mile of the project site. These sources include a ready-mix concrete facility and two water supply facilities. These facilities are subject to SJVAPCDS permitting requirements. As part of the permitting process, these facilities would be evaluated to ensure that any releases of TACs would not adversely impact nearby sensitive land uses that would exceed SJVAPCD's recommended significance thresholds. Given that these facilities are subject to SJVAPCD permitting requirements, the identified facilities would not result in an increased health risk to onsite students or staff in excess of SJVAPCD's significance thresholds. Implementation of the proposed project would not result in the location of sensitive land uses closer to these facilities. No other major stationary sources were identified within one-quarter mile of the project site. In addition, the project site is not located within 500 feet of a freeway or other busy traffic corridor. Predicted onsite health risks for onsite students and staff are anticipated to be minor and would not be anticipated to exceed the SJVAPCD's significance thresholds. In addition, implementation of the proposed project would not result in the long-term operation of any major onsite stationary sources of TACs, nor would project implementation result in a significant increase in diesel-fueled vehicles traveling along area roadways. For these reasons, long-term exposure to TACs would be considered less than significant.

Short-term Construction

Less than Significant Impact

Naturally Occurring Asbestos: Naturally-occurring asbestos, which was identified by ARB as a TAC in 1986, is located in many parts of California and is commonly associated with ultramafic rock. The project site is not located near any areas that are likely to contain ultramafic rock (DOC 2000). As a result, the risk of exposure to asbestos during the construction process would be considered less than significant.

Less than Significant Impact with Mitigation Incorporated

Localized PM Concentrations: The SJVAPCD Regulation VIII, Fugitive PM10 Prohibitions requires implementation of dust control measures and limits allowable dust emissions. Project construction would result in short-term increases of fugitive dust and diesel-exhaust PM emissions associated predominantly with site preparation, grading, material handling, and vehicle travel on unpaved and paved surfaces. On-site off-road equipment and trucks would also result in short-term emissions of diesel-exhaust PM (DPM) and fugitive dust, which could contribute to elevated localized concentration at nearby receptors. Health-

related risks associated with diesel-exhaust emissions are primarily associated with long-term exposure and associated risk of contracting cancer. Given the duration of potential exposure, construction-generated DPM would not be projected to exceed SJVAPCD's health risk significance thresholds. However, if uncontrolled, emissions of construction-generated PM may result in short-term increases in localized pollutant concentrations, which could contribute to increased occurrences of Valley Fever and potential increases in nuisance impacts to nearby receptors. For these reasons, localized uncontrolled concentrations of construction-generated PM would be considered to have a potentially significant impact. Mitigation Measures AQ-1 through AQ-8 shall be implemented to reduce potential expose of nearby sensitive receptors to localized concentrations of construction-generated PM:

Mitigation Measures: Implement Mitigation Measures AQ-1 through AQ-8.

Significance After Mitigation
Mitigation Measures AQ-1 through AQ-8 include measures that would reduce short-term emissions of construction generated PM, including measures to reduce mobile-source DPM and fugitive dust. SJVAPCD-recommended measures for the control of fugitive dust are included, which would help to ensure compliance with SJVAPCD's Regulation VIII. With the implementation of the mitigation measures, localized PM emissions would be reduced to acceptable levels and this impact would be considered less than significant.

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

Less than Significant Impact
Other emissions potentially associated with the proposed project would be predominantly associated with the generation of odors during project construction. The occurrence and severity of odor impacts depend on numerous factors, including: the nature, frequency, and intensity of the source; wind speed and direction; and the sensitivity of the receptors. While offensive odors rarely cause any physical harm, they still can be very unpleasant, leading to considerable distress among the public and often generating citizen complaints to local governments and regulatory agencies. Construction of the proposed project would involve the use of a variety of gasoline or diesel-powered equipment that would emit exhaust fumes.

Exhaust fumes, particularly diesel-exhaust, may be considered objectionable by some people. In addition, pavement coatings used during project construction would also emit temporary odors. However, construction-generated emissions would occur intermittently throughout the workday and would dissipate rapidly within increasing distance from the source. As a result, short-term construction activities would not expose a substantial number of people to frequent odorous emissions. In addition, no major sources of odors have been identified in the project area. This impact would be considered less than significant.

4. Biological Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U. S. Fish and Wildlife Service?			**X**	
b. Have a substantially adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or U. S. 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 resident or migratory fish or wildlife species or with established native resident 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**

Would the project:

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

Less than Significant Impact

The following sources were reviewed to obtain information on sensitive biological resources occurring in the vicinity of the proposed project: California Natural Diversity Database (CNDDB), United States Fish and Wildlife Service (USFWS) Information for Planning and Consultation System (IPCS), the USFWS National Wetlands Inventory (NWI), and the Parks, Open Space, and Conservation Element of the General Plan.

There are 55 animal and 28 plant species with special species status[2] that have historically occurred within a 9-topographic quadrangle search area as defined by the California Natural Diversity Database and are presented in Appendix 2.

Broadly speaking, the city lies at the edge of the larger San Joaquin Valley eco-region, with portions of two key open space areas, the Grasslands Ecological Area (GEA) and the Pacific Flyway, neighboring to the east. Biological resources within the City's Sphere of Influence are largely those associated with small tracts of farmland, isolated wetlands, and the riparian habitat along Los Banos Creek. As stated previously, the proposed project site is located on vacant land within the city surrounded by urban residential development and schools. Based on a review of the aforementioned data sources the proposed project is not located within any areas known for the potential of containing candidate, sensitive, or special status species and or habitats. Therefore, the proposed project will have a less than significant impact.

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

Less than Significant Impact

The city is located within the Middle San Joaquin-Lower Chowchilla watershed, which lies within the greater San Joaquin Hydrologic Sub-basin as defined by the U.S. Geologic Survey. Primary surface water features in the city include a variety of human-made water conveyance canals including the Main Canal, San Luis Canal, and Santa Fe Canal. These canals are used for both drainage conveyance and irrigation purposes. Los Banos Creek, a seasonal water feature, also flows through the city in a north/south direction. The nearest water feature is the San Luis Canal, located about one-mile northeast of the proposed project site. The impact is less than significant.

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?

Less than Significant Impact

According to Figure 3.8-1 of the General Plan, there are no federally protected wetlands within the City limits. The impact is less than significant.

d. Interfere substantially with the movement of any resident or migratory fish or wildlife species or with established native resident migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less than Significant Impact

Several areas, including the water features described above within the city, could potentially be utilized as migratory corridors for the movement of wildlife. According to data sources described above there are no native wildlife nursery areas. As previously described, the proposed project site is within a well-developed urbanized area of the city. The impact is less than significant.

[2] Special species status includes species that are considered endangered, threatened, candidate, or sensitive by the California Department of Fish and Wildlife or the U.S. Fish and Wildlife Service. Special status species also include raptors because they are protected by the federal Migratory Bird Treaty Act and Bald and Golden Eagle Protection Act.

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

Less than Significant Impact
According to Section 5 of the General Plan, guiding policies and implementing actions would protect biological resources within the city limits. Specifically, Implementing Action POSR-I-27 requires the preservation of mature trees and encourages the planting of drought-resistant street and shade trees in all new developments. Mature trees are not present on the site. The landscaping of the proposed project site would comply with the General Plan. The impact is less than significant.

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

No Impact
The city is not located within an adopted Habitat Conservation Plan or Natural Community Plan. Therefore, the proposed project will have no impact.

5. Cultural Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines § 15064.5?		X		
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines § 15064.5?		**X**		
c. Disturb any human remains, including those interred outside of formal cemeteries?		**X**		

Would the project:

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

b. Cause a substantial adverse change in the significance of an archeological resource pursuant to State CEQA Guidelines Section 15064.5?

Less than Significant Impact with Mitigation Incorporated
A California Historical Resources Information System (CHRIS) records search (see Appendix 3) was conducted through the Central California Information Center. The CHRIS review indicated that there are no recorded cultural resources within the project area. A Native American Heritage Commission (NAHC) Sacred Lands File (SLF) search was conducted (see Appendix 3), which did not identify any known areas of concern in the SLF inventory. A Request for Preliminary Comment and AB 52 Notification was sent to the eight tribes identified by the NAHC. The Santa Rosa Rancheria Tachi-Yokut Tribe responded with a request for SLF and CHRIS records searches, which were sent to them, and to have a monitor on site during

ground-disturbing activities (please refer to Section E, 18, Tribal Cultural Resources, for further information).

Project construction would include ground disturbing activities, such as grading and excavation, which could potentially reveal undiscovered historical or archaeological resources. Therefore, in the event that subsurface resources are discovered during construction, Mitigation Measure CR-1 would be implemented.

> **CR-1:** If cultural resources are encountered during ground disturbing construction activities, work shall stop in the immediate vicinity of the find and a qualified cultural resources specialist shall be consulted to determine the significance of the resources in accordance with CEQA Guidelines §15064.5. If potentially significant, the specialist shall make recommendations to the District on mitigation measures to be implemented to protect the discovered resources in accordance with CEQA Guidelines §15064.5 and Public Resources Code §21083.2. If human remains are encountered during ground disturbing activities, work shall stop in the immediate vicinity of the find and the County Coroner notified in accordance with Health and Safety Code §7050.5 and CEQA Guidelines §15064.5(e). If the remains are determined to be of Native American descent, the procedures and requirements set forth in CEQA Guidelines §15064.5(d) and (e) and Public Resources Code §5097.98 shall be implemented.

Significance after Mitigation
With the implementation of Mitigation Measure CR-1, this impact would be less than significant.

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

Less than Significant Impact with Mitigation Incorporated
In the event that human remains are encountered during construction, Mitigation Measure CR-1 would be implemented.

6. Energy Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			**X**	
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?			**X**	

Background

An Energy Impact Assessment was prepared by Ambient Air Quality & Noise Consulting for this proposed project and is included as Appendix 4 to this Initial Study. This Initial Study uses information from the analysis to evaluate the proposed Project impacts.

In summary, energy sources for the city, and the proposed Project, are served primarily by Pacific Gas & Electric (PG&E). PG&E also maintains a system of underground and overhead lines to supply electricity to the city. The City offers local clean energy supply options for residents, businesses, and its operations. Los Banos is a member of the Peninsula Clean Energy network, a Community Choice Aggregation (CCA) agency. The primary clean energy source is the Wright Solar Project just outside the city's boundaries.

Local Regulatory Framework
Relevant local regulations and codes pertaining to energy impacts associated with the proposed Project include but are not limited to the following

City of Los Banos General Plan
The General Plan contains several guiding policies and implementing actions to increase energy efficiency within the city. Applicable General Plan energy policies include, but are not limited to, the following:

- Policy P-P12.3 Encourage the use of low-emission buildings, such as HVAC equipment, and operation equipment for all new residential and commercial development.
- Policy P-P12.4 Provide incentives and/or partner with the Community Choice Aggregation agency for improving energy efficiency in existing buildings.
- Policy PFS-P7.5 Pursue opportunities to require or encourage on-site energy storage, such as on-site batteries, within facilities and developments.

City of Los Banos Municipal Code
The City of Los Banos, California Municipal Code Title 8 Building Regulations Chapter 1 Building Codes outlines current codes and standards required by the city.

- Section 8-1.01 Adoption of the California Building Code 2022 Edition.
- Section 8-1.04 Adoption of the California Energy Code 2022 Edition.
- Section 8-1.07 Adoption of California Electrical Code 2022 Edition.
- Section 8-1.11 Adoption of the California Existing Building Code 2022 Edition.
- Section 8-1.12 Adoption of the California Green Building Standards Code 2022 Edition

Would the project:

a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less than Significant Impact
Implementation of the proposed Project would increase electricity, diesel, gasoline, and natural gas consumption associated with construction activities, as well as long-term operational activities. Energy consumption associated with short-term construction and long-term operational activities are discussed in greater detail, as follows:

Construction-Related Energy Consumption
Energy consumption would occur during construction, including fuel use associated with the on-site operation of off-road equipment and vehicles traveling to and from the construction site. As noted in Table 1 of Appendix 4, the operation of off-road construction equipment would use an estimated total of 50,189 gallons of diesel. On-road vehicles would use an estimated total of 1,403 gallons of gasoline and 50,384 gallons of diesel. In total, construction fuel use would equate to approximately 7,091 million

British thermal units (MMBTU). Construction equipment use and associated energy consumption would be typical of that commonly associated with the construction of new land uses. Idling of heavy-duty diesel construction equipment and trucks during loading and unloading shall be limited to five minutes in accordance with the State's ARB's In-Use Off-Road Diesel regulation. Energy use associated with the construction of the proposed project would be temporary and would not be anticipated to result in the need for additional capacity, nor would construction be anticipated to result in increased peak-period demands for electricity. As a result, project construction would not be anticipated to require the use of construction equipment that would be less energy efficient than those commonly used for the construction of similar facilities. Construction of the proposed Project would not result in an inefficient, wasteful, or unnecessary consumption of energy. This impact would be considered less than significant.

Operational Mobile-Source Energy Consumption

Operational mobile-source energy consumption would be primarily associated with daily travel by employees and students. As noted in Table 2 of Appendix 4, vehicle trips associated with the proposed land uses would consume an estimated 32,519 gallons of diesel and 39,014 gallons of gasoline on an annual basis. The development of increasingly efficient automobile engines and the retirement of older less efficient vehicles from the fleet would result in increased energy efficiency and energy conservation in future years. The proposed project would not result in increased fuel usage that would be considered unnecessary, inefficient, or wasteful. This impact would be considered less than significant.

Operational Building-Use Energy Consumption

The proposed project would result in increased electricity and natural gas consumption associated with the long-term operation of onsite facilities. As depicted in Table 3 of Appendix 4, operation of the proposed Project would result in the annual consumption of approximately 241,988 kilowatt hours (kWh) of electricity, 5,474 kWh of water, and 1,560,254 kilo British thermal units (kBTU) of natural gas. In total, the proposed development would consume an annual equivalent total of approximately 2,405 MMBTU. The Project design includes measures to reduce overall energy use, water use, and waste generation. Some of these features include the installation of energy-efficient appliances, high-efficiency exterior lighting, low-flow water fixtures, water-efficient landscaping, and irrigation, as well as LED interior lighting and high-efficiency HVAC systems. In addition, the project will also include solar photovoltaic systems on classroom roofs. Predicted KWh/year energy generated by these systems is speculative at this time and, to be conservative, has not been included in operational energy use estimates. These improvements would help to further reduce the project's energy use. The project would be subject to energy conservation requirements in the CEC (Title 24, Part 6, of the California Code of Regulations, California's Energy Efficiency Standards for Residential and Nonresidential Buildings) and the California Green Building Standards Code (CALGreen) (Title 24, Part 11 of the California Code of Regulations). Adherence to Title 24 requirements measures would ensure that the project would not result in wasteful and inefficient use of non-renewable resources due to building operation. For this reason, this impact would be considered less than significant.

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

Less than Significant Impact

The project would be required to be in full compliance with the CBC, including applicable green building standards and building energy efficiency standards. The project would not conflict with other goals and policies outlined in the General Plan that pertain to renewable energy and energy efficiency. Therefore, the

proposed project would not conflict with state or local plans for renewable energy or energy efficiency, and this impact would be considered less than significant.

7. Geology and Soils

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:			X	
(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-a-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 wastewater disposal systems where sewers are not available for the disposal of wastewater?				X
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X	

Background

A Geotechnical Investigation and Geologic-Seismic Hazards Evaluation Report was prepared by Technicon Engineering Services, Inc. for this project and is included as Initial Study Appendix. This Initial Study incorporates information and analysis from this report to evaluate the impacts related to geologic and seismic impacts.

Would the project:

a. Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:

(i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

Less than Significant Impact

The site is not located in an Alquist-Priolo Earthquake Fault Zone as established by the Alquist-Priolo Fault Zoning Act (Section 2622 of Chapter 7.5, Division 2 of the California Public Resources Code). The California Geological Survey Fault Activity Map of California was reviewed to determine if identified active faults are located on or near the project. According to the map, no identified active faults are located on the subject site. Based upon the reviewed geologic and seismologic reports, maps, and aerial photographs, no mapped active faults cross or project toward the site. Additionally, no evidence of active faulting was visible during the site evaluation. The site is not located in an Alquist-Priolo Earthquake Fault Zone. On December 7, 2023, a magnitude 3.7 earthquake struck the Diablo Mountain Range 16.4 miles south-southwest of Los Banos. Shaking was experienced by residents of Los Banos, but no injuries or damage was reported.

The potential for fault-related surface rupture at the project site is very low. The impact is less than Significant.

(ii) Strong seismic ground shaking?

Less than Significant Impact

Based on the review of published data and current understanding of the geologic framework and tectonic setting of the proposed project, the primary sources of seismic shaking and fault type near the site are listed in Table 7-1. A major seismic event on these or other nearby faults may cause ground shaking at the site. The magnitude of an earthquake, known as maximum moment magnitude (Mw), for these faults ranges from 6.7 to 7.4 Mw. Based on the deterministic ground acceleration, the San Andreas Fault, located west of the site, is considered the governing fault.

Table 7-1
Primary Sources of Seismic Shaking

Fault Name	Fault Type	Distance from Site (miles)	Magnitude (Mw)
Great Valley	Thrust	6	7.1
Ortigalita	Right Lateral/ Strike-Slip	15	6.7
Calaveras	Strike Slip	35	7.0
San Andreas	Right Lateral/ Strike-Slip	36	7.4

The moment magnitude scale (Mw) is a measure of an earthquake's size or strength based on its seismic movement. Similar to the Richter scale; it is considered the authoritative magnitude scale for ranking earthquakes by size.

Compliance with the California Building Standards Code and the Field Act would avoid the risks of hazards associated with geology, soils, and seismicity to an acceptable level. The impact is less than significant.

(iii) Seismic-related ground failure, including liquefaction?

Less than Significant Impact

Seismically induced settlement due to liquefaction was evaluated to be 1.1 inches. The general guidelines of the California Geologic Survey indicate the differential seismically induced settlement across a building would be about one-half the total settlement. This would result in differential settlement across buildings of approximately 0.50-inch. The estimated differential settlement is anticipated to be within the tolerance of the proposed structures and will not result in significant damage or collapse. Therefore, no mitigation against liquefaction and/or settlement is necessary. The impact is less than significant.

(iv) Landslides?

Less than Significant Impact

The proposed project site is relatively flat, with slope failure and earthquake-induced landslides considered low risk. The impact is less than significant.

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

Less than Significant Impact

Development of the proposed project would entail relatively little risk of erosion or loss of topsoil since the project site has a flat topography and is not subject to notable amounts of wind or water erosion. The potential for water-or wind-borne erosion and loss of topsoil would exist during the construction phase of the proposed project, primarily due to clearing, excavation, and grading activities. State Water Resources Control Board regulations require the development and implementation of Storm Water Pollution Prevention Plans, which must specify best management practices that a project would employ to minimize pollution of storm water. Best management practices include erosion controls, sediment controls, wind erosion controls, non-storm water management controls, and waste management and controls (i.e., good housekeeping practices). Once construction is completed, the potential for erosion would be minimal because the ground would be covered by grass-turfed areas, buildings, hard surfaces, and other landscaping. The impact is 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

The soil type of the proposed project site is Woo-Urban (Natural Resources Conservation Services, 2023). The Woo series consists of deep, well-drained soils with slopes of 0 to 5 percent. The coarse-grained layers of sand were evaluated for potential liquefaction. Seismically induced settlement due to liquefaction was evaluated to be 1.1 inches. The general guidelines of the California Geological Survey indicate the differential seismically induced settlement across a building would be about one-half the total settlement. This would result in differential settlement across buildings of approximately 0.50-inch. The estimated settlement is anticipated to be within the tolerance of the proposed structures and will not result in significant damage or collapse. The impact is less than significant.

According to the Merced County General Plan (County of Merced, 2013), habitable structures are prohibited in areas of unconsolidated landslide debris or areas vulnerable to landslides. Since the proposed project site is located on relatively flat terrain, the potential for landslides or other slope failures from earthquake-inducted ground shaking is unlikely. The impact is less than significant.

d. Be located on expansive soil, as defined in Table 18-a-B of the Uniform Building Code (1994), creating substantial risks to life or property?

Less than Significant Impact

The soil series is underlying the project site is considered "expansive", a quality characterized by slow permeability and the potential to shrink or swell significantly with changes in moisture content. Expansive soils are a potential geologic hazard as structures located on them may be damaged should the soil suddenly shrink or swell. Two (2) Expansion Index (EI) tests were performed on soil samples collected from the near-surface soils of the site. The tests indicated the near-surface soils have a moderate potential for expansion. These expansive soils are susceptible to moderate volume changes associated with changes in soil moisture content.

The potential for future differential movement of structures resulting from these soils can be reduced to normally tolerable levels by following the moisture conditioning, compaction, foundation, slab-on-grade, and site drainage recommendations presented in Appendix 4. The impact is less than significant.

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

No Impact

The proposed project would be served by the City's sanitary sewer system. The use of septic tanks or alternative water systems is not part of the proposed project. Therefore, the proposed project will have no impact.

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

Less than Significant Impact

Potentially sensitive areas for the presence of paleontological resources are based on the underlying geologic formation (City of Los Banos 2022b). Marine conditions existed in the Central Valley, including the San Joaquin Valley, for millions of years until further tectonic movements and climate change gradually drained the area of water. Los Banos is an area filled with fertile sediments as a result of marine and terrestrial deposits.

The General Plan's Park, Open Space, and Conservation Element contains a goal and policies that require local planning and development decisions to consider potential impacts to the loss or damage to paleontological resources. The following goal and policies serve to minimize potential adverse impacts to paleontological resources.

Goal P-10. Protect and restore the cultural and historic resources of Los Banos.

> Policy P-P10.5. Require that new development analyze and avoid any potential impacts to archaeological, paleontological, and designated historic resources.
>
> Policy P-P10.8. Prohibit the damage or destruction of paleontological resources, including prehistorically significant fossils, ruins, monuments, or objects of antiquity, that could potentially be caused by future development.

Implementation of the General Plan goal and policies, and compliance with state, regional, and local regulations pertaining to paleontological resources, would ensure that the proposed project would not directly or indirectly cause substantial adverse effects to paleontological resources. Therefore, the impact would be less than significant, and no mitigation measures are required.

8. Greenhouse Gas Emissions

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		X		
b. Conflict with any applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?		X		

Background

An Air Quality and Greenhouse Gas Impact Analysis was prepared by Ambient Air Quality & Noise Consulting for this proposed project and is included as Appendix 1 to this Initial Study. This Initial Study uses information from the analysis to evaluate the proposed project impacts.

Would the project:

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

Less than Significant Impact

Short-term Greenhouse Gas Emissions

Implementation of the proposed project would contribute to increases in GHG emissions that are associated with global climate change. Short-term and long-term GHG emissions associated with the development of the proposed project are discussed in greater detail, as follows: Short-term Greenhouse Gas Emissions Short-term annual GHG emissions are summarized in Table 12 of Appendix 1. Based on the modeling conducted, annual emissions of GHGs associated with the construction of the proposed project would total approximately 580 MTCO2e. There would also be a small amount of GHG emissions from waste generated during construction; however, this amount is speculative. Actual emissions would vary, depending on various factors including construction schedules, equipment required, and activities conducted. Assuming an average project life of 30 years, amortized construction-generated GHG emissions would total approximately 19.33 MTCO2e/yr. Annual construction-generated GHG emissions would not exceed the GHG significance threshold of 900 MTCO2e/yr. As a result, short-term construction GHG emissions would not have a significant impact on the environment nor be anticipated to conflict with GHG-reduction efforts. As a result, this impact is considered less than significant.

Less than Significant Impact with Mitigation Incorporated

Long-term Greenhouse Gas Emissions

Estimated long-term increases in GHG emissions associated with the proposed project are summarized in Table 13 of Appendix 1. Annual operational emissions for the future target year 2030 were calculated to ensure consistency with SB 32. Based on the modeling conducted, operational GHG emissions would total

approximately 658 MTCO2e/year in 2026 and 612 MTCO2e/year in 2030. With the inclusion of amortized construction emissions, operational GHG emissions would total approximately 677 MTCO2e/year in 2026 and 631 MTCO2e/year in 2030. The total project-generated GHG emissions would not exceed the GHG significance threshold of 900 MTCO2e/yr. However, the proposed project does not include BMPs that would constitute its "fair share" of what would be required to assist the State in meeting its long-term climate goals, including achieving carbon neutrality by 2045. As a result, this impact would be considered potentially significant.

The following mitigation measures shall be implemented to ensure the project includes BMPs:

GHG-1. Building mechanical equipment and appliances shall be electrically powered. The installation of natural-gas service/infrastructure shall be prohibited.

GHG-2. Meet current CALGreen Tier 2 standards for electric vehicle (EV) parking spaces, except that all EV parking spaces required by the code shall be "EV-capable" instead of "EV-Ready".

Significance After Mitigation
Implementation of Mitigation Measure GHG-1 and GHG-2 would prohibit the installation of natural-gas-fueled appliances and building mechanical equipment and ensure the installation of EV-capable parking spaces. These measures would further reduce on-site emissions of GHGs from the project. With mitigation, this impact would be considered less than significant.

b. Conflict with any applicable plan, policy, or regulation of an agency adopted to reduce the emissions of greenhouse gases?

Less than Significant Impact with Mitigation Incorporated
Applicable GHG-reduction plans include the Merced County Association of Governments (MCAG) 2022 RTP/SCS and the ARB's 2022 Climate Change scoping plan. Project consistency with these plans is discussed in greater detail, as follows:

MCAG 2022-2045 RTP/SCS Consistency: To support the State's GHG-reduction goals, including the goals mandated by SB 32, California established the Sustainable Communities and Climate Protection Act (SB 375). SB 375 requires regional metropolitan planning organizations, such as MCAG, to develop SCSs that align transportation, housing, and land use decisions toward achieving the State's GHG emissions-reduction targets. Under SB 375, the development and implementation of SCSs, which link transportation, land use, housing, and climate policy at the regional level, are designed to reduce per capita mobile-source GHG emissions, which is accomplished through the implementation of measures that would result in reductions in per capita VMT. As previously noted, the MCAG 2022-2046 RTP/SCS was developed in accordance with state and federal requirements including SB 375 which aims to reduce GHG emissions related to mobile sources. As noted in the traffic analysis prepared for this project, based on MCAG guidelines, the proposed project would have a less-than-significant VMT impact. As a result, the proposed project would not conflict with any goals or objectives identified in the MCAG 2022-2046 RTP/SCS.

Climate Change Scoping Plan: The previously adopted 2017 Climate Change Scoping Plan incorporated the State's GHG emissions reductions target of 40 percent below 1990 emissions levels by 2030, as mandated by SB 32. On November 16, 2022, the ARB approved the 2022 Scoping Plan for Achieving Carbon Neutrality. The recently adopted 2022 Scoping Plan continues the path to achieve the SB 32 2030 target and expands upon earlier Scoping Plans by targeting an 85 percent reduction in GHG below 1990 levels by 2045. A significant part of achieving the SB 32 goals are strategies to promote sustainable

communities, such as the promotion of zero net energy buildings, and improved transportation choices that result in reducing VMT. Other measures include the increased use of low-carbon fuels and cleaner vehicles. As noted above, the proposed project would have a less-than-significant impact concerning regional VMT-reduction targets and, as such, would not conflict with any goals or objectives identified in the MCAG 2022-2046 RTP/SCS. The proposed project would be designed to meet current and future building energy efficiency standards required by the California Building Code and Green Building Standards. The project design includes measures to reduce overall energy use, water use, and waste generation. Some of these features include energy-efficient appliances, high-efficiency exterior lighting, low-flow water fixtures, water-efficient landscaping, and irrigation as well as LED interior lighting and high-efficiency HVAC systems. In addition, the project will also include solar photovoltaic systems on classroom roofs. Predicted energy savings associated with these systems are not yet available and, as a result, have not been included in operational energy use. These improvements would help to further reduce the project's GHG emissions. However, as noted in Impact GHG-1, the proposed project does not include BMPs that would constitute its "fair share" of what would be required to assist the State in meeting its long-term climate goals, including achieving carbon neutrality by 2045. As a result, this impact would be considered potentially significant.

Mitigation Measure: Implement Mitigation Measure GHG-1.

Significance After Mitigation:
As previously noted, implementation of Mitigation Measure GHG-1 would prohibit the installation of natural gas-fueled appliances and building mechanical equipment and ensure the insulation of EV-capable parking spaces. These measures would further reduce on-site emissions of GHGs from the project. With mitigation, the proposed project would not conflict with ARB's 2022 Climate Change Scoping Plan and would be contributing its fair share toward assisting the State in meeting its goal of carbon neutrality by 2045, per Executive Order B-55-18. The project's design and implementation of Mitigation Measure GHG-1 would ensure alignment with both statewide and regional climate change policies, plans, and strategies. The analysis conducted to assess the consistency of the project with relevant plans, policies, and regulations, including the 2022 Climate Change Scoping Plan and the MCAG 2022-2046 RTP/SCS, confirms that the project complies with these regulatory requirements, with recommended mitigation measures incorporated. With mitigation, the project's GHG emissions would not result in a significant impact on the environment nor conflict with applicable GHG-reduction policies, plans, or regulations.

9. Hazards and Hazardous Materials

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			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	
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 Section 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 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
h. CEQA Guidelines section 15186, Public Resources Code section 21151.8, Education Code Section 17213, and California Code of Regulations, Title 5, Section 14011[h]. This section of CEQA establishes requirements for evaluating the safety of potential school sites. The purpose of the requirements is to ensure that potential health hazards resulting from exposure to any hazardous materials, wastes, and substances that may exist on a site will be carefully examined and disclosed in a negative declaration or EIR and that the lead agency will consult with other agencies in this regard. The EIR or negative declaration must address the following concerns under the aforementioned sections: Is the proposed school site:				
i. The site of a current or former hazardous waste or solid waste disposal facility and, if so, has the waste been removed?				X
ii. A hazardous substance release site identified by the Department of Toxic Substances Control in a				X

	current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code?				
iii.	The site of one or more buried or above ground pipelines that carry hazardous substances, acutely hazardous materials, or hazardous wastes, as defined in Division 20 of the Health and Safety Code? This does not include a natural gas pipeline used only to supply the school or neighborhood.				**X**
iv.	Within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor?				**X**

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 of the project would involve the transport and use of fuels, lubricants, greases, solvents, and architectural coatings including paints. Operation of the project could involve small quantities of hazardous materials used for cleaning and maintenance purposes: cleansers, solvents, paints, pesticides, and fertilizers. The school would be subject to state and local regulations governing the routine transport, use, and disposal of hazardous materials and the release of hazardous materials into the environment. In addition, the California Education Code requires that the school site undergo an environmental review process overseen by the California Department of Toxic Substances Control (DTSC). The purpose of the process is to determine if a release or threatened release of any hazardous materials found on the proposed site or presence of any naturally occurring hazardous materials on the site present a risk to human health or the environment. A Preliminary Environmental Assessment (PEA) Report was prepared for the site by Padre Associates, Inc. (November 2023). Based on site testing and the risk assessment performed, constituents of potential concern were not present at a level that would warrant additional action. Given the characteristics of the project along with the regulations and oversight processes in place to prevent and/or reduce potential impacts, this impact is less than significant.

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

The proposed project involves the construction and operation of an educational facility, an early learning center. The potential for the project to emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste is addressed in Section E, 9.a above, and was determined to be less than significant.

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

Although the project itself will not emit hazardous air emissions or handle hazardous substances or waste, Public Resources Code Section 21151.8 and CEQA Guidelines Section 15186 require that a Negative Declaration for a school construction project not be approved unless the District has consulted with the Air Pollution Control District and county health department to determine whether there are any facilities within one-fourth mile of the site that might reasonably be anticipated to emit hazardous air emissions or handle hazardous substances or waste. Although such potential facilities were identified, the health risks from the facilities will not constitute a potential endangerment of public health to persons who would attend or be employed at the proposed project (see Appendix 3).

d. Be located on a site that 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.

Based on a review of the California Department of Toxic Substances Control's EnviroStor website and the State Water Board's Geotracker website, no hazardous materials sites exist on or near the project site. There is no impact.

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?

No Impact

The nearest airport is the Los Banos Municipal Airport, and the project site is located approximately 11,300 feet (1.86 nautical miles) east of the nearest point of Runway 14/32. For school sites within two nautical miles of an airport runway, the Department of Education is required to consult with the Department of Transportation (Caltrans) as to the safety of the site concerning airport operations (Education Code Section 17215). Caltrans, in a letter dated February 23, 2023, has indicated that "based on our evaluation of existing condition and planned development, Caltrans has no objection to the establishment of the proposed school site." (Caltrans, 2023) The proposed project is not located within the projected 60 dBA CNEL/Ldn noise exposure contour of this airport. Therefore, implementation of the proposed project would not result in the exposure of sensitive receptors to excessive aircraft noise levels. There is no impact.

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

No Impact

All schools have emergency response/evacuation plans. Merced's Public Health Emergency Preparedness (PHEP) is responsible for developing response plans to be used in the event of a large-scale threat to the health of residents of Merced County. However, research conducted for this Initial Study did not identify any adopted emergency response plans or emergency evacuation plans the project could impair. There is no impact.

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

No Impact
The project site is not within or near a state responsibility area or a very high fire hazard severity zone. Therefore, the risk of wildland fires would be considered low. There is no impact.

h. CEQA Guidelines Section 15186, Public Resources Code Section 21151.8, Education Code Section 17213, and California Code of Regulations, Title 5, Section 14011[h].

The above code sections establish requirements for evaluating the safety of potential school sites. The purpose of the requirements is to ensure that potential health hazards resulting from hazardous materials, wastes, and substances and hazardous air emissions that may exist on or near a site will be carefully examined and disclosed in a negative declaration or EIR and that the lead agency will consult with other agencies in this regard. The EIR or negative declaration must address the following concerns under the aforementioned sections:

Is the proposed school site:

i. The site of a current or former hazardous waste or solid waste disposal facility and, if so, has the waste been removed?

No Impact
Based on a review of the California Department of Toxic Substances Control's EnviroStor website and the State Water Board's Geotracker website, no hazardous waste or solid waste disposal facility exists on or near the project site. There is no impact.

ii. A hazardous substance release site identified by the Department of Toxic Substances Control in a current list adopted pursuant to Section 25356 of the Health and Safety Code for removal or remedial action pursuant to Chapter 6.8 (commencing with Section 25300) of Division 20 of the Health and Safety Code?

No Impact
Based on a review of the California Department of Toxic Substances Control's EnviroStor website and the State Water Board's Geotracker website, no hazardous substance release sites exist on or near the project site. There is no impact.

iii. The site of one or more buried or above ground pipelines that carry hazardous substances, acutely hazardous materials, or hazardous wastes, as defined in Division 20 of the Health and Safety Code? This does not include a natural gas pipeline used only to supply the school or neighborhood.

No Impact
There are no buried or above-ground pipelines on the site of the proposed project. (Padre Associates, Inc., 2017). There is no impact.

iv. Within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor?

No Impact
There are no freeways or busy traffic corridors within 500 feet of the project site. There is no impact.

10. Hydrology and Water Quality

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?			X	
b. Substantially deplete 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:			X	
(i) result in 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 off-site?			X	
(iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional resources of polluted runoff; or			X	
(iv) impede or redirect flood flows?			X	
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	

Would the project:

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

Less than Significant Impact

The Los Banos General Plan 2042 EIR found that implementation of the General Plan would result in a less than significant impact with respect to violation of water quality standards, waste discharge requirements or degradation of surface or groundwater quality. The project is consistent with the General Plan land use designation of Civic/Institutional and has no characteristics that would violate any water quality standards or waste discharge requirement or degrade surface or groundwater quality. The impact is less than significant.

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 Los Banos General Plan 2042 EIR found that implementation of the General Plan would result in a less than significant impact with respect to decreasing groundwater supplies or interfering with groundwater recharge such that the project may impede sustainable groundwater management of the basin. The project is consistent with the General Plan land use designation of Civic/Institutional and has no characteristics that would substantially decrease water supplies or interfere substantially with groundwater recharge. The impact is 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 substantial erosion or siltation on- or off-site;

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

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

iv. Impede or redirect flood flows?

Less than Significant Impact

The proposed project site is located on an infill site that is generally flat and surrounded by existing residential development and two schools, Los Banos Junior High and Grasslands Elementary. There are no streams or rivers on the site that would be altered. The site is bare ground with a well-drained soil type. Construction of the proposed project would increase the amount of impervious surface by installing buildings, parking, a roadway, and sidewalks. The project would be required to prepare and submit a Storm Water Pollution Prevention Plan (SWPPP) to the State Water Resources Control Board (SWRCB) that describes the measures to control discharges from construction. The SWPPP must list Best Management Practices (BMPs) that would be implemented to prevent soil erosion and discharge of other construction-related pollutants that could contaminate nearby water resources. A grading plan would direct storm run-off into the stormwater facilities planned to serve the site. Since the planned stormwater facilities are adequate to serve the site and since the site is subject to SWPPP preparation, the impact is less than significant.

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

Less than Significant Impact

Flood zone mapping by the Federal Emergency Management Agency (FEMA) indicates the proposed project site is located outside of the 100 and 500-year floodplains. The proposed project is not located within a floodway or otherwise placed in an area that would interfere with flood flows. The project site is located 15.87 miles west of the San Joaquin River and 4.5 miles from the 100-year flood boundary (located at the Los Banos Wildlife Area to the north). The relatively flat topography, low incidence of rain, and availability of various drainage management facilities make sudden floods by rain unlikely.

According to Section 7.2 of the General Plan, "three dams close to Los Banos have the potential of inundating portions or the whole of the Planning Area. Flood zone mapping by the U.S. Army Corps of Engineers indicates that all of the proposed project area is located within the San Luis Reservoir dam inundation area. Northern portions of the proposed project area are also located within the Los Banos

Detention Reservoir and the Little Panoche Reservoir Dam inundation area." All three dams are owned by the Bureau of Reclamation and are inspected regularly for their structural integrity. In response to the potential of inundation as a result of dam failure, the City has adopted policies, which include coordination with the U.S. Army Corps of Engineers on potential flooding risks and ensuring that City staff and Emergency Response Services are trained to respond to catastrophic dam failure.

No enclosed surface water bodies, which might be subject to potential seiches, are located in the proposed project site vicinity. Based on its location, inland from coastal areas, the proposed project site would not be subject to tsunami effects. The proposed project site is not located in an area susceptible to mudflows.

Based on the above, which indicates the flooding of the site is very unlikely, and that fact the school would only use or store small amounts of hazardous materials (see Section E, 9.a), this impact is less than significant.

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

Less than Significant Impact

The Los Banos General Plan 2042 EIR found that implementation of the General Plan would result in a less than significant impact with respect to conflicting with or obstructing the implementation of a water quality control plan or sustainable groundwater management plan. The project is consistent with the General Plan land use designation of Civic/Institutional and has no characteristics that would conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan. The impact is less than significant.

11. Land Use and Planning

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
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	

Would the project:

a. Physically divide an established community?

No Impact

The physical division of an established community typically refers to the construction of a physical feature (such as an interstate highway or railroad tracks) or the removal of a means of access (such as a local road or bridge) that would impair mobility within an existing community, or between a community and outlying areas.

The proposed project site is a small infill area, 4.58 acres, surrounded by urban residences, an elementary school, and a junior high school within the City. Schools are an integral part of a complete community and can serve as a unifying feature. No aspects of the proposed project have been identified as causing a physical division of the surrounding area. The proposed project would not construct features that would physically divide an established community or remove means of access such as a road that would impair mobility in a community. There would be no impact.

b. Conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less than Significant Impact

According to City's 2042 General Plan the land use designation of the proposed project site is Civic/Institutional (City of Los Banos 2022b) and the site zoning is P-F, Public Facilities. Therefore, the proposed project is consistent with the General Plan land use designation and zoning and, as demonstrated in this Initial Study, would not result in environmental impacts that cannot be mitigated to a less than significant level. Therefore, the impact is less than significant.

12. Mineral Resources

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Result in the loss of availability of a known mineral resource that would be of 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

Would the project:

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

No Impact

City's 2042 General Plan (pages P-15 and P-16), states, "According to the Department of Conservation: Mines and Geology, there are no known significant mineral resources located within the Planning Area. The Planning Area contains parts of San Luis Ranch alluvium and Modesto alluvium, known mineral occurrences of underdetermined mineral resources significance. According to the State Office of Mine Reclamation, sand and gravel is currently mined within portions of the Los Banos Creek Fan, located southwest of the Planning Area. Although further exploration of the Planning Area could result in the reclassification of specific localities, no mineral resources have been historically exploited or are currently being exploited commercially within the Planning Area." Therefore, the proposed project will have no impact on mineral resources of Statewide or local importance

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

For the reasons stated above, there is no impact.

13. Noise

Would the project result in:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b. Generation of excessive groundborne vibration or groundborne noise levels?		X		
c. For a project located within a private airstrip or 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	

Background

A Noise and Groundborne Vibration Impact Analysis was prepared by Ambient Air Quality & Noise Consulting for this proposed project and is included as Appendix 7 to this Initial Study. This Initial Study uses information from the analysis to evaluate the proposed project impacts.

In summary, noise-sensitive land uses are generally considered to include those uses where noise exposure could result in health-related risks to individuals, as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are considered noise-sensitive land uses. Noise-sensitive receptors in the project area consist predominantly of residential dwellings located adjacent to the proposed project's western property line. The nearest residential-use property line is located approximately 5 feet west of the project site boundary.

The noise environment in the proposed project area is defined primarily by vehicular traffic on the nearby local roadways of Place Road and East B Street. Additionally, the local noise environment includes school bells. To document existing ambient noise levels at the project site, short-term ambient noise measurements were conducted on December 7, 2023. Daytime ambient noise levels in the vicinity of nearby noise-sensitive land uses range from approximately 46 to 65 A-Weighted Decibels[3] (dBA) Equivalent Sound Level[4] (Leq). Ambient noise levels were influenced primarily by vehicle traffic on area roadways.

[3] A-weighted decibel (dBA or dB(A)) is an expression of the relative loudness of sounds as perceived by the human ear. A-weighting gives more value to frequencies in the middle of human hearing and less value to frequencies at the edges as compared to a flat audio decibel measurement. A-weighting is the standard for determining hearing damage and noise pollution.

[4] Equivalent Sound Level - L_{eq} - quantifies the noise environment to a single value of sound level for any desired duration. It is designed to represent a varying sound source over a given time as a single number. L_{eq} is also sometimes known as Average Sound Level.

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 with Mitigation Incorporated

Noise generated by the proposed project would occur during short-term construction and long-term operation. Noise-related impacts associated with short-term construction and long-term operations of the proposed project are discussed separately, as follows:

Short-Term Construction Impacts

Construction noise typically occurs intermittently and varies depending upon the nature or phase (e.g., demolition/land clearing, grading, excavation, erection) of construction. Noise generated by construction equipment, including earth movers, material handlers, and portable generators, can reach high levels. Although noise ranges were found to be similar for all construction phases, the building construction phase would involve the most equipment.

Typical noise levels associated with construction equipment are summarized in Table 5 of Appendix 7. Noise levels generated by individual pieces of construction equipment typically range from approximately 77 to 90 dBA maximum sound level[5] (Lmax) at 50 feet. Average-hourly noise levels associated with construction equipment generally range from approximately 72 to 82 dBA Leq at 50 feet.

The nearest noise-sensitive land uses located in the vicinity of the proposed project site are residential dwellings, which are located approximately 10 feet or more away from the project on the western border. Depending on the location and types of activities conducted, predicted noise levels at the nearest existing residences could potentially exceed an average-hourly noise limit of 80 dBA Leq. Furthermore, concerning residential land uses, activities occurring during the more noise-sensitive evening and nighttime hours could result in increased levels of annoyance and potential sleep disruption. For these reasons, this impact would be considered potentially significant.

The following mitigation measures shall be implemented to reduce short-term construction-related noise impacts:

NOI-1. Noise sources associated with construction shall be limited to between 7 a.m. and 9 p.m. on weekdays, and between 8 a.m. and 5 p.m. on weekends.

NOI-2. Construction equipment shall be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. Equipment engine shrouds shall be closed during equipment operation.

NOI-3. When not in use, all equipment shall be turned off and shall not be allowed to idle.

NOI-4. To the extent locally available, electrified, or alternatively powered construction equipment shall be used.

[5] Maximum Sound Level for safe human hearing is 85 decibels. Sounds above this level can be harmful to human hearing and potentially dangerous.

NOI-5. Construction equipment staging areas shall be located at the furthest distance possible from nearby noise-sensitive land uses.

Significance After Mitigation
Implementation of the above measures would limit construction activities to the less noise-sensitive periods of the day in the City following Los Banos Municipal Code requirements. Additional measures would also be required to further reduce the potential for noise exposure, including the use of alternatively powered equipment, exhaust mufflers, and engine shrouds. Implementation of these noise-reduction features can reduce construction noise levels by approximately 10 dBA, or more. With implementation of the above mitigation measures and because activities would be short-term, this impact would be considered less than significant.

Long-Term Operational Impacts

Less than Significant Impact
On-Site Stationary Noise Sources. On-Site stationary source noise levels of primary concern would include air conditioning units, on-site vehicle parking areas, and outdoor play areas. Noise-related impacts associated with these sources are discussed in further detail below.

Outdoor Air Conditioning Units
Commercial-use air conditioning units typically generate noise levels of approximately 60-65 dBA Leq at 3 feet when operating. Typical operational cycles for air conditioning units occur for periods of approximately 10 minutes and in 20- to 30-minute intervals. When averaged over an approximate 1-hour period predicted average-hourly noise levels at the nearest residential land use would be approximately 41 dBA L_{50}/Leq. Predicted operational noise levels would not exceed the City's daytime average-hourly noise standards of 55 dBA L_{50}. As a result, increased noise levels associated with outdoor air conditioning units would be less than significant.

On-Site Parking Areas
The proposed project would include a staff parking lot and a parent/visitor parking lot with a designated drop-off zone. Noise levels associated with parking lots typically include; vehicle operations, the opening and closing of vehicle doors, and the operation of vehicle sound systems. The nearest proposed parking area to nearby existing residential land uses is the staff designated parking lot. Which would be located in the northwestern corner of the project site. This parking lot would provide 48 parking spaces and would be located roughly 250 feet from the nearest existing residences located west of the project site on Greenbriar Way. Based on this distance and assuming that all 48 parking spaces would be accessed over an approximate 1-hour period, predicted noise levels at these nearest existing residential land uses would be approximately 37.5 dBA L_{50}/Leq, or less. Predicted parking area noise levels at the nearest residential land uses would not exceed the City's daytime average-hourly noise standards of 55 dBA L_{50}.

Additionally parking lots generate sources of Instantaneous noise such as the setting/arming of car security systems and triggering of car alarms. Noise levels associated with arming car security systems typically range from 60-65 dBA L_0 at five feet, the triggering of car alarms generates on average noise levels of 80-85 dBA L_0 at five feet. To be conservative, predicted instantaneous noise sources were calculated from the nearest proposed parking spot to the nearest receptor. Noise levels associated with arming car security systems at the nearest existing receptor would be approximately 43 dBA L_0 or less. Noise levels associated with the triggering of car alarms at the nearest existing receptor would be 63 dBA

L_0 or less. Predicted instantaneous noise levels associated with the proposed parking lot would not exceed the City's daytime instantaneous noise standard of 75 dBA L_0. As a result, this impact would be considered less than significant.

Outdoor Play Areas

The proposed transitional kindergarten would include several outdoor turf fields and play structures. Noise generated by small playgrounds typically includes elevated children's voices, and occasional adult voices. Based on measurement data obtained from similar land uses, noise levels associated with small playgrounds can generate intermittent noise levels of approximately 55-60 dBA Leq at 50 feet. The nearest existing residential land uses would be located approximately 100 feet from proposed onsite play areas and would be largely shielded from direct line-of-sight by intervening structures. Assuming a maximum noise level of 60 dBA Leq at 50 feet, a distance of 100 feet from the source center, and a minimum noise-level reduction of 5 dB for shielding, predicted noise levels at the nearest residential land uses would be 44 dBA L50/Leq, or less. Predicted noise levels associated with the operation and use of outdoor play areas would not exceed the City's daytime average-hourly noise standards of 55 dBA L50. As a result, this impact would be considered less than significant.

Long Term Exposure to Increased Roadway Traffic

Predicted existing traffic noise levels and increases associated with the implementation of the proposed project are summarized in Table 6 of Appendix 7. As depicted, implementation of the proposed project would result in predicted increases in existing traffic noise levels of up to approximately 0.2 dBA CNEL/Ldn. Perceptible changes in ambient noise levels do not typically occur at levels below 3 dBA. Implementation of the proposed project would not result in a significant increase (i.e., 3 dBA or greater) along area roadways. For this reason, this impact would be considered less than significant.

Compatibility of Proposed Land Uses with Roadway Traffic

Based on the traffic noise modeling conducted for this project, the predicted future year 2030 roadway traffic noise levels along East B Street, would be 62 dBA CNEL/Ldn at 50 feet from the nearest travel lane. Predicted future horizon year roadway traffic noise levels along Place Road would be 60 dBA CNEL/Ldn at 50 feet from the nearest travel lane. The nearest proposed classroom would be located approximately 77 feet from the center line of Place Road and approximately 150 feet from East B Street. Based on these distances and the predicted future traffic noise levels noted above, predicted traffic noise levels at onsite classrooms would be approximately 58 dBA CNEL/Ldn, or less. The nearest proposed outdoor play area would be located approximately 30 feet from the center line of Place road. Based on this distance and the predicted future noise levels noted above, predicted traffic levels at outdoor play areas would be approximately 62 dBA CNEL/Ldn, or less. Predicted future traffic noise levels at proposed on-site school land uses would not exceed the City's normally acceptable land compatibility noise standard of 75 dBA CNEL/Ldn for playgrounds and neighborhood parks as well as schools, libraries, hospitals, churches, and nursing homes. As a result, this impact would be considered less than significant.

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

Less than Significant Impact with Mitigation Incorporated

No major stationary sources of groundborne vibration were identified in the project area that would result in the long-term exposure of proposed onsite land uses to unacceptable levels of ground vibration. In addition, the proposed project would not involve the use of any major equipment or processes that would result in potentially significant levels of ground vibration that would exceed these standards at

nearby existing land uses. However, construction activities associated with the proposed project would require the use of various tractors, trucks, and jackhammers that could result in intermittent increases in groundborne vibration levels. The use of major groundborne vibration-generating construction equipment/processes (i.e., blasting, pile driving) is not anticipated to be required for the construction of future onsite land uses.

Groundborne vibration levels commonly associated with construction equipment are summarized in Table 7 (Appendix 7). Groundborne vibration levels generated by construction equipment would be approximately 0.089 in/sec ppv, or less, at 25 feet. The nearest existing structures are residential dwellings, the nearest of which is located approximately 10 feet west of the proposed project site. Assuming a maximum equipment vibration level of 0.089 in/sec ppv, or less, at 25 feet at the nearest project site boundary, predicted vibration levels at this nearest residence would be 0.244 in/sec ppv. Predicted groundborne vibration levels would exceed the minimum recommended criteria for structural damage or human annoyance (0.5 and 0.2 in/sec ppv, respectively) at nearby land uses. As a result, short-term groundborne vibration impacts would be considered potentially significant.

Mitigation Measures: Implement Mitigation Measures NOI-1 through NOI-5.

Significance After Mitigation
Implementation of the mitigation measures would help reduce human annoyance caused by vibrations associated with the construction of the proposed project. Construction activities will be restricted to the less noise-sensitive periods of the day in accordance with Los Banos Municipal Code requirements. In addition, construction staging areas shall be located at the furthest distance possible from nearby noise-sensitive land uses. Vibration levels at the nearest existing land uses would not exceed the structural damage threshold of 0.5 in/sec ppv[6]. For these reasons and with the implementation of the mitigation measures noted above, this impact would be considered less than significant.

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

Less than Significant
The project site is not located within 2 miles of a public airport or private airstrip. The nearest airport is the Los Banos Municipal Airport located approximately 2.2 miles west of the project site. The project site is not located within the projected noise contours of this airport. Implementation of the proposed project would not result in the exposure of sensitive receptors to excessive aircraft noise levels, nor would the proposed project affect airport operations. For these reasons, this impact is considered less than significant.

[6] ppv Peak Particle Velocity is a measurement of maximum ground particle movement speed. It is used as an indicator of damage potential.

14. Population and Housing

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Induce substantial unplanned population growth either in an area, 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

Would the project:

a. Induce substantial unplanned population growth either in an area, directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less than Significant Impact
The proposed project site is designated for Civic/Institutional use by the General Plan and is within an area largely built out with urban residences and adjacent schools. The establishment of a small school facility on land planned and zoned for school use in an area with existing urban infrastructure will not induce substantial unplanned population growth. The impact is less than significant.

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

No Impact
The proposed project site is vacant. It does not propose moving or relocating people living in nearby housing or the removal or repurposing of any housing. Therefore, no people will be displaced. There is no impact.

15. Public Services

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered government facilities or need for new or physically altered government facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
(i) Fire Protection?			X	
(ii) Police Protection?			X	
(iii) Schools?			X	
(iv) Parks?			X	
(v) Other public facilities?			X	

a. Would the project result in substantial adverse physical impacts associated with the provision of new or altered governmental facilities, need for new or 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 following public services: fire protection, police protection, schools, parks, and other public facilities?

Less than Significant Impact

The project is a school, which is consistent with the General Plan land use designation of Civic/Institutional and the P-F (Public Facilities) zoning. The project site is located in an urbanized area that is already served by City fire, police, and other public services. The incremental need for services for the project will not trigger the need to provide new governmental facilities that would cause significant environmental impacts. This impact is less than significant.

16. Recreation

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood or regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
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	

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?

***Less than Significant Impact*.**
The proposed project site is within one-half mile of several parks including Elena Talbott Park, Verona Basin Park, and Park Arcadia. Because the proposed project is serving the entire school district, there may be a minor increase in the use of nearby parks, but not to the extent that it would cause substantial deterioration. This impact is less than significant.

b. Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

Less than Significant Impact
The proposed project includes limited recreational facilities to serve the school's students. The impact is less than significant.

17. Transportation

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?		X		
b. Conflict or be inconsistent with CEQA Guidelines section 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	

Introduction

The discussion of transportation and traffic impacts in this section reflects the information in the Traffic Impact Analysis (TIA) and Vehicle Miles Traveled (VMT) Analysis prepared by JLB Traffic Engineering, Inc. and are included as Appendices 8 and 9 to this Initial Study, respectively.

Existing Traffic Conditions

Important roadways, serving the proposed project are summarized below:

Mercey Springs Road

Mercey Springs Road (State Route 165) is an existing north-south arterial divided by a two-way left-turn lane in the vicinity of the proposed project site. In this area, Mercey Springs Road is primarily a two-lane arterial throughout the City of Los Banos Sphere of Influence (SOI). The City of Los Banos 2042 General Plan's Circulation Element designates Mercey Spring Road as an arterial throughout the City of Los Banos boundary. Planned road improvements include intersection improvements at Pacheco Boulevard and Mercey Springs Road and expansion to a four-lane facility between Henry Miller Avenue and Copa De Oro Avenue.

Miller Lane

Miller Lane is an existing north-south two-lane undivided local roadway in the vicinity of the proposed project site. In this area, Miller Lane is a two-lane local roadway between San Luis Street and Pacheco Boulevard (State Route 152). The City of Los Banos 2042 General Plan's Circulation Element designates Miller Lane as a local roadway between San Luis Street and Pacheco Boulevard.

Las Palmas Street

Las Palmas Street is an existing north-south undivided local roadway in the vicinity of the proposed project site. In this area, Las Palmas Street is a two-lane local roadway between Mission Drive and B Street. The City of Los Banos 2042 General Plan Update's Circulation Element designates Las Palmas Street as a two-lane local roadway between Mission Drive and B Street.

Place Road

Place Road is an existing north-south two-lane undivided collector in the vicinity of the proposed project site. In this area, Place Road is a two-lane collector between Regency Drive and Pioneer Road. The City of Los Banos 2042 General Plan's Circulation Element designates Place Road as a collector between Regency Drive and Pioneer Road. Planned improvements include connecting Place Road to the north side of Pacheco Boulevard and realigning Place Road south of the Rail Trail to Pioneer Road.

B Street

B Street is an existing east-west two-lane undivided collector in the vicinity of the proposed project site. In this area, B Street is a two-lane arterial divided by a two-way left turn between 7th Street and Mercy Springs Road and a two-lane undivided collector between Mercy Springs Road and Ward Road. The City of Los Banos 2042 General Plan's Circulation Element designates B Street as a collector between 7th Street and Ward Road.

San Luis Street

San Luis Street is an existing east-west two-lane undivided collector adjacent to the proposed project site. In this area, San Luis Street is a two-lane undivided collector between Mercy Springs Road and Ward Road and a two-lane divided collector between Ward Road and Pacheco Boulevard. The City of Los Banos 2042 General Plan Update's Circulation Element designates San Luis Street as a collector between Mercy Springs Road and Pacheco Boulevard.

Pacheco Boulevard (State Route 152)

Pacheco Boulevard (State Route 152) is an existing east-west four-lane divided arterial in the vicinity of the proposed project site. In this area, Pacheco Boulevard is a primarily four-lane arterial throughout the City of Banos SOI. The City of Los Banos 2042 General Plan Update's Circulation Element designates Pacheco Boulevard as an arterial throughout the City of Los Banos SOI. Planned improvements include intersection improvements at Pacheco Boulevard and Mercy Springs Road, the State Route 152 Bypass north of Los Banos, and a possible widening to six-lanes from west of Badger Pass to the State Route 152 Bypass.

Vehicle Miles Traveled

Senate Bill (SB) 743 requires that relevant CEQA analysis of transportation impacts be conducted using a metric known as Vehicle Miles Traveled (VMT) instead of Level of Service (LOS). VMT measures how much actual auto travel (additional miles driven) a proposed project would create on California roads. If the project adds excessive car travel onto our roads, the project may cause a significant transportation impact.

The CEQA Guidelines were amended to implement SB 743, by adding Section 15064.3. Among its provisions, Section 15064.3 confirms that except concerning transportation projects, a project's effect on automobile delay shall not constitute a significant environmental impact.

Level of Service

Level of Service (LOS) is a quality measure describing operational conditions within a traffic stream, generally in terms of such service measures as speed and travel time, freedom to maneuver, traffic interruptions, and comfort and convenience. General Plan Policy C-P2.1 "requires the roadway system to obtain segments at level of service (LOS) C and intersections at LOS D or better for two-hour peak periods (a.m. and p.m.) on all major roadways and intersections in Los Banos". The General Plan defines LOS conditions that range from LOS A, or free-flow conditions, to LOS F, or congested conditions.

The potential traffic impacts of the proposed project were evaluated following the standards set forth by the City's LOS policies and Caltrans for the following scenarios: Existing Traffic Conditions, Existing plus Project Traffic Conditions, Near Term plus Project Traffic Conditions, Cumulative Year 2044 No Project Traffic Conditions, and Cumulative Year 2044 plus Project Traffic Conditions.

Study Intersections

Existing intersection peak hour turning movement counts and a spot speed survey was conducted at the following intersections in the vicinity of the project site during January, April, and August of 2023 while schools were in session. The intersection turning movement counts included pedestrian and bicycle volumes.

a. Mercey Springs Road (State Route 165) / B Street
b. Las Palmas Street / B Street
c. Place Road / B Street
d. Place Road / Parent Exit (Future)
e. Mercey Springs Road (State Route 165) / San Luis Street
f. Miller Lane / San Luis Street
g. Place Road / San Luis Street
h. Miller Lane / Pacheco Boulevard (State Route 152

Existing LOS and Improvements Needed

At present, the intersections of Mercey Springs Road at San Luis Street and Miller Lane at San Luis Street exceed their LOS threshold during the AM peak period. As a result, the following improvements would be needed to improve the existing LOS deficiencies at these intersections.

- Mercey Springs Road / San Luis Street
  - o Signalize the intersection with protected left-turn phasing in the southbound direction.
- Miller Lane / San Luis Street
  - o Add an eastbound left-turn lane;
  - o Modify the eastbound left-through-right lane to a through-right lane;
  - o Add a westbound left-turn lane; and
  - o Modify the westbound left-through-right lane to a through-right lane.

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 with Mitigation Incorporated

Level of Service Impacts

The proposed project is estimated to generate approximately 1,214 daily trips, 287 AM peak hour trips and 520 Mid-Day (MD) peak hour trips. The trip distribution assumptions were developed based on existing travel patterns, the existing roadway network, engineering judgment, data provided by the District, knowledge of the study area, existing residential densities and the City of Los Banos General Plan 2042 Circulation Element in the vicinity of the project site.

The traffic generated by the project will contribute to LOS deficiencies during one or both peak periods at the intersections of Mercey Springs Road at B Street, Las Palmas Street/Main Access at B Street, Mercey Springs Road at San Luis Street, Miller Lane at San Luis Street and Place Road at San Luis Street under all future scenarios. Table 17-1 lists the traffic improvements that are needed at each intersection to

mitigate to an acceptable LOS. The Project will pay a pro-rata fair share toward the improvements, except for the Las Palmas Street/Main Access at B Street improvements, which would be 100% the responsibility of the District. However, fair share contributions should only be made for those facilities or portion thereof currently not funded by the responsible agencies roadway impact fee program(s) or grant funding, as appropriate. The fair share percentages are noted in Table 17-1 and calculated as shown in Table XI of Appendix 8.

The Traffic Impact Analysis (Appendix 8) evaluated the future traffic circulation conditions at the project site and recommended that there be at least 30 minutes between the AM and PM sessions to prevent excess congestion at the site. It also recommends that parents in the PM session not be allowed to drop off their children more than 15 minutes prior to the start of the session.

The following mitigation measures are incorporated into the project to ensure compliance with City LOS policy and to avoid excess congestion on the site during the transition between the AM and PM sessions:

> **TR-1:** The District shall pay a pro-rata fair share for the traffic improvements listed in Table 17-1, except for the Las Palmas Street/Main Access at B Street improvements, which shall be 100% the responsibility of the District.
>
> **TR-**2: The District shall operate the project such that there is at least 30 minutes between the AM and PM sessions, and parents in the PM session shall not be allowed to drop off their children more than 15 minutes prior to the start of the session.

Significance After Mitigation.
Implementation of Mitigation Measure TR-1 will ensure compliance with City LOS policy. Mitigation Measure TR-2 will avoid excess congestion on the site during the transition between the AM and PM sessions. With mitigation, all impacts would be considered to be less than significant.

Bikeways
Bikeways exist adjacent to and in the vicinity of the Project site. Adjacent to the Project site, a Class II Bikeway exists along B Street. In the vicinity of the Project site, Class II Bikeways exist along B Street and Miller Lane. The City of Los Banos Bicycle-Pedestrian Plan has planned Bikeways in the vicinity of the Project site. A Class I Bikeway is planned along Place Road; however, the City planning documents do not provide sufficient data to determine on what side of place road the Class 1 facility will need to be on. In the vicinity of the Project site, Bikeways are planned along Mercey Springs Road, Place Road and San Luis Street.

Walkways
Walkways exist adjacent to and in the vicinity of the proposed project site. Adjacent to the project site, Walkways exist along B Street and Place Road. In the vicinity of the project site, walkways exist along Mercey Springs Road, Pacheco Boulevard, Miller Lane, Place Road, Las Palmas Street, B Street, and San Luis Street. The City of Los Banos Bicycle-Pedestrian Plan has planned walkways in the vicinity of the project site. Walkways are planned along a portion of the south side of San Luis Street.

Transit
The Los Banos Commuter runs along Pacheco Boulevard. The nearest stop on this route to the proposed project site is located on the northwest quadrant of Ward Road and Pacheco Boulevard, about 1 mile southeast. The Los Banos Commuter runs along Pacheco Boulevard.

Table 17-1: Traffic Improvements by Scenario

	Existing plus Project	**Near Term plus Project**	**2044 Cumulative plus Project**
Mercey Springs Road/B Street (4.36% Fair Share)	-Add a second northbound through lane with a receiving lane on the north leg; -Add a second southbound through lane with a receiving lane on the south leg; and - Modify the existing traffic signal to accommodate the additional lanes.	No Further Improvements	−Add an eastbound right-turn lane; −Modify the eastbound through-right lane to a through lane; −Modify the existing traffic signal to accommodate the additional lanes
Las Palmas Street/B Street (100% District Responsibility)	-Add an eastbound right-turn lane; -Modify the eastbound through-right lane to a through lane; -Add a northbound left-turn lane; -Modify the northbound left-through-right lane to a through-right lane; -Add a southbound left-turn lane; -Modify the southbound left-through-right lane to a through-right lane; and -Signalize the intersection with protected left-turn phasing in all directions.	No Further Improvements	No Further Improvements
Mercey Springs Road/San Luis Street (4.20% Fair Share)	-Signalize the intersection with protected left-turn phasing in the southbound direction.	−Add a second northbound through lane with a receiving lane on the north leg; −Add a second southbound through lane with a receiving lane on the south leg;	No Further Improvements
Miller Lane/San Luis Street (2.18% Fair Share)	- Add an eastbound left-turn lane; - Modify the eastbound left-through-right lane to a through-right lane; - Add a westbound left-turn lane; and - Modify the westbound left-through-right lane to a through-right lane.	No Further Improvements	No Further Improvements
Place Road/San Luis Street (7.45% Fair Share)	- Add a southbound left-turn lane; and - Modify the southbound left-right lane to a right-turn lane.	−Add an eastbound left-turn lane; −Modify the eastbound left-through-right lane to a through-right lane; −Add a westbound left-turn lane; −Modify the westbound left-through-right lane to a through-right lane; −Add a northbound left-turn lane; −Modify the northbound left-through-right lane to a through-right turn lane; −Modify the southbound left-through-right lane to a through-right lane; and −Signalize the intersection with protected left-turn phasing in all directions.	No Further Improvements

The project would not conflict with any programs, plans or policies related to bicycle, pedestrian or transit facilities.

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

Less than Significant Impact

Vehicle Miles Traveled

Based on the Merced County Association of Governments (MCAG) guidelines, projects that fall under the description of a local park, daycare center, student housing project, local-serving gas station or K-12 public school are screened out of SB 743-related VMT requirements. As the project is a public school that serves the local population, it falls under the category of a K-12 public school. Per MCAG VMT Guidelines, K-12 public schools can be presumed to have a less than significant VMT impact and are screened out from a quantitative VMT Analysis. Therefore, this project would have a less than significant VMT impact.

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

Less than Significant Impact

The roadways providing access to the proposed project site were previously constructed to City roadway standards. The project would result in a significant impact if it would include features that would create a hazard such as a sharp curve in a new roadway or create a blind corner or result in sight distance issues from entryways. There are no hazardous design features resulting from the project. The project proposes constructing two (2) access points along the south side of B Street and one (1) access point along the west side of Place Road. Existing and proposed access points would minimize traffic operational impacts to existing and future roadway networks. An emergency access is planned that would connect Greenbriar Way west of the proposed project to Place Road east of the project. Parking is currently restricted on all roadways adjacent to the proposed project. Project impacts associated with hazards due to design, features or traffic operations are less than significant.

d. Result in inadequate emergency access?

Less than Significant Impact

For school projects, the Department of the State Architect (DSA) reviews plans to assure project compliance with code requirements related to structural safety; fire and life safety; accessibility; and sustainability. The Los Banos Fire Department would review all plans to ensure adequate emergency access is provided. An emergency access is planned that would connect Greenbriar Way west of the proposed project to Place Road east of the project. Based on the above, this impact would be less than significant.

18. Tribal Cultural Resources

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resource 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 the Public Resources Code § 5020.1(k)?		**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 Resources Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe?		**X**		

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)?**

(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 with Mitigation Incorporated

A California Historical Resources Information System (CHRIS) records search was conducted through the Southern San Joaquin Valley Information Center (SSJVIC) and there are no recorded resources within the project area (See Appendix 3). A Native American Heritage Commission (NAHC) Sacred Lands File search was conducted, which was negative. A Request for Preliminary Comment and AB 52 Notification was sent to each of the eight tribes identified by the NAHC.

A response was received from the Santa Rosa Rancheria Tachi-Yokut Tribe, which requested tribal monitoring of any ground disturbing activity related to the project. This recognizes that subsurface tribal cultural resources could be discovered during ground disturbing activity. The following mitigation measures will be incorporated into the project.

TC-1: Prior to starting construction on the project, the District shall contact the Santa Rosa Rancheria Tachi-Yokut Tribe to arrange for a tribal monitor or observer to be present at the project site during-ground disturbing construction and preconstruction activities.

TC-2: If tribal cultural resources are discovered during ground-disturbing activities, work shall stop in the immediate vicinity of the find and a qualified professional with expertise in tribal cultural resources shall be consulted to recommend an appropriate course of action in consultation with potentially affected tribes. If it is determined that the project may cause a substantial adverse change to a tribal cultural resource, mitigation measures to be considered should include those identified in Public Resources Code Section 21084.3**.**

Significance After Mitigation
Implementation of the mitigation measures would reduce the project's potential impacts related to tribal cultural resources to a less than significant level.

19. Utilities and Service Systems

Would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction 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 determination by the wastewater treatment provider, which serves or may serve the project, that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
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	

Would the project:

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

Less than Significant Impact
Pacific Gas & Electric (PG&E) provides electricity and natural gas services. The Los Banos Public Works Department (PWD) is responsible for providing water in the City through a system of wells and interconnected water mains. Wastewater is collected throughout the City via a network of sanitary sewer

collection pipelines and storm drainage collected through a network of drainage pipelines that discharge to storm water basins and canals. The City has sufficient capacity to accommodate the proposed project and will not exceed any treatment requirements imposed by the Regional Water Quality Control Board. Wastewater influent is gravity-fed into a Wastewater Treatment Plant (WWTP) located in the northeastern portion of the city. The project site is an infill site within the City and will be connected to the City's existing utility services. No new utility facilities would be constructed or relocated due to the project. The impact is less than significant.

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

Less than Significant Impact

The General Plan 2042 EIR determined that there would be sufficient water supplies for buildout associated with the General Plan and found that impacts associated with water supply would be less than significant. The project is consistent with the General Plan Civic/Institutional designation for the project site. The impact is less than significant.

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

Less than Significant Impact

The General Plan 2042 EIR determined that the City's Wastewater Treatment Plant would have adequate capacity to serve the EIR Study Area's projected future demand and impacts would be less than significant. The project is consistent with the General Plan Civic/Institutional designation for the project site. The impact is less than significant.

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

Less than Significant Impact

The City contracts with Mid Valley Disposal for solid waste collection services. The City's solid waste is taken to Billy Wright Landfill, a Class III facility with a lifespan estimated to last until 2055. The landfill is located approximately 4.5 miles west of Los Banos . The General Plan 2042 EIR determined that the City and waste service providers would comply with all applicable federal, State, and local solid waste regulations. Therefore, the impact would be less than significant.

20. Wildfire

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?				X
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from wildfire or the uncontrolled spread of 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 the 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

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

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

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

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

No Impact

No impacts involving wildfire would occur as a result of the project. The proposed project site is not located in a State Responsibility Area or classified as a Very High Fire Hazard Severity Zone.

21. Mandatory Findings of Significance

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?		X		
b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means 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		

a. Does the project have the potential to 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, 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

Based on the information in Sections E,1 (Aesthetics); E,3 (Air Quality); E,5 (Cultural Resources); E,8 (Greenhouse Gases); E,13 (Noise); E,17 (Transportation); and E,18 (Tribal Cultural Resources), the project could have potentially significant impacts. However, these impacts would be less than significant with the incorporation of the mitigation measures provided in the respective sections.

b. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means 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 with Mitigation Incorporated

Based on the information in Section E,8 (Greenhouse Gases) and Section E,17 (Transportation) , the proposed project would have impacts that would potentially be cumulatively considerable. However, these impacts would be less than significant with the incorporation of the mitigation measures provided in the respective sections.

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

Less than Significant Impact with Mitigation Incorporated

Based on the information in Sections E,3 (Air Quality); E,8 (Greenhouse Gasses), and E, 13, (Noise), the proposed project could potentially have substantial adverse effects on human beings. However, mitigation measures have been incorporated into the project that would reduce the impacts to a less than significant level.

F. Mitigation Monitoring and Reporting Program

1. Purpose

Los Banos Unified School District has prepared this Mitigation Monitoring and Reporting Program to comply with Section 15097 of the State CEQA Guidelines. The purpose of the Mitigation Monitoring and Reporting Program is to ensure the implementation of the mitigation measures identified in this Initial Study.

2. Lead Agency

Los Banos Unified School District will undertake the project and is the Lead Agency for the project. The District is responsible for the implementation of all mitigation measures identified in this Initial Study

3. Mitigation Monitoring and Reporting Coordinator

The Los Banos Unified School District Facilities & Special Projects Manager, or designee shall act as the Project Mitigation Reporting Coordinator ("Coordinator")

4. Monitoring and Reporting Procedures for Construction

a. The Coordinator shall provide a copy of all project design-, site clearing- and construction-related mitigation measures to the project engineer and contractor for incorporation in the project plans, construction specifications, permits, and contracts, as appropriate.

b. Before the awarding of the bid, the Coordinator shall determine that all project design, site clearing and construction-related mitigation measures have been incorporated in the project plans, construction specifications, permits, and contracts, as appropriate.

c. During construction, the Coordinator, through the construction management team, shall inspect the project area regularly to ensure all work complies with the mitigation measures. If a discrepancy is not resolved within a reasonable time, the Coordinator may order work to cease until the discrepancy is resolved.

d. Before the District accepts the project improvements, the Coordinator shall certify that the project incorporates all project design and construction-related mitigation measures.

5. Monitoring and Reporting Procedures for Operational and Maintenance

Before the project becomes operational, the Coordinator shall determine that the project's operational plans and procedures incorporate all operations-related mitigation measures.

G. Names of Individuals Who Prepared the Initial Study

1. Lead Agency

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JLB Traffic Engineering, Inc. (Traffic Impact Analysis and Vehicle Miles Traveled Analysis)
www.jlbtraffic.com

H. Sources Consulted

Following are the documents and other sources consulted in preparing this Initial Study[7]:

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[7] The sources used in the preparation of the Initial Study appendices are included in each appendix.

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