April 2023 | Initial Study/Mitigated Negative Declaration

CHAVEZ-KEMBLE ELEMENTARY SCHOOL REBUILD PROJECT

Sacramento City Unified School District

Prepared for:

Sacramento City Unified School District
Contact: Nathaniel Browning, Facilities Director
Facilities Support Services
425 1st Avenue,
Sacramento, CA 95818
916.257.9640

Prepared by:

PlaceWorks
Contact: Dwayne Mears, Principal
3 MacArthur Place, Suite 1100
Santa Ana, California 92707
714.966.9220
info@placeworks.com
www.placeworks.com

PLACEWORKS

Table of Contents

Table of Contents

APPENDICES

Table of Contents

List of Figures

Table of Contents

List of Tables

Abbreviations and Acronyms

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

Abbreviations and Acronyms

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

Abbreviations and Acronyms

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

Abbreviations and Acronyms

USFWS	United States Fish and Wildlife Service
USGS	United States Geological Survey
UST	underground storage tank
UWMP	urban water management plan
V/C	volume-to-capacity ratio
VdB	velocity decibels
VHFHSZ	very high fire hazard severity zone
VMT	vehicle miles traveled
VOC	volatile organic compound
WQMP	water quality management plan
WSA	water supply assessment

1. Introduction

The Sacramento City Unified School District (District) proposes to completely rebuild the 8.71-acre site that currently contains the Kemble Elementary School (grades TK-3) and Chavez Elementary School (grades 4-6), with a new elementary school that would accommodate students from transitional kindergarten through 6th grade. The two schools would be combined to form one elementary school facility but maintaining the two separate school programs. The name of the combined campus is yet to be determined. The schools are located in the City of Sacramento in Sacramento County; Kemble Elementary School is located at 7495 29th Street and Chavez Elementary School is located at 7500 32nd Street. The proposed project would follow the District's master plan, education specifications, and 21st century educational concepts. The proposed project is required to undergo an environmental review pursuant to the California Environmental Quality Act (CEQA).

As the lead agency with the principal responsibility for carrying out and approving the project, the District is required to consider the project's potential environmental consequences and determine if its benefits outweigh any significant effects. This document is an "initial study" of the effects.

1.1 PROJECT LOCATION

The 8.71-acre site encompasses two schools, Kemble Elementary School on 7495 29th Street and Chavez Elementary School on 7500 32nd Street, both in the City of Sacramento. The Assessor's Parcel Number (APN) for Kemble Elementary School is 049-0183-002 and the APN for Chavez Elementary School is 049-0176-002. The project site is bound by residential uses along Torrance Avenue to the north, residential uses along 32nd Street to the east, Kemble Park and residential uses to the south, and residential uses along 29th Street to the west of the project site. The project site is approximately 0.19-mile west of a railway.

The City of Sacramento is bound by Yolo County and Solano County to the west; the City of Elk Grove to the south; and unincorporated Sacramento County to the north, east, and south. The project site is approximately 2.1 miles to the east of Interstate 5 (I-5) and 1.70 miles west of State Route 99 (SR-99). Figure 1, *Regional Location,* Figure 2, *Local Vicinity,* and Figure 3, *Aerial Photograph,* show the project site in its regional and local contexts.

1.2 ENVIRONMENTAL SETTING

1.2.1 Existing Land Use

Facilities

The project site currently operates as a Transitional Kindergarten (TK) through sixth grade school (TK through 3rd-grade students attend Kemble Elementary and 4th- through 6th-grade students attend Chavez Elementary). Chavez Elementary School was built in 2000 and includes five portable buildings consisting of the following:

1. Introduction

office, library, cafeteria, classrooms, and restrooms (SCUSD 2020a). Chavez Elementary School consists of 27,360 square feet of building space. Kemble Elementary School was built in 1963 and over the years, portable classrooms were added to accommodate more students. The most recent portables were added in 2003 (SCUSD 2020a). There is a total of 12 buildings at Kemble Elementary School, which include administration, library, multi-purpose room with stage, cafeteria, restrooms, and classrooms. The Kemble Elementary School consists of 45,547 square feet of building space (SCUSD 2020b).

These structures are located in the eastern and western portions of the site, the hardcourts are located in the central portion of the site, and the playfields are in the northern portion of the site.

Figure 3, *Aerial Photograph*, shows the existing site facilities from an aerial view. Figure 4a through Figure 4c, *Site Photographs,* show photos of the project site. According to the Facility Conditions Assessment for Chavez Elementary School, key findings included the need to replace the fire alarm control panel as it is in poor condition, sizeable cracks in the pedestrian sidewalk, eroded landscaping, and extensive cracking in the interior floor finish (SCUSD 2020a). Additionally, according to the Facility Conditions Assessment for Kemble Elementary School, key findings included the siding starting to pull off from the exterior wall; siding of exterior wall showing signs of dry rot; roof membranes have blisters and wood supports have decay and fascia damage; the roof for buildings 1, 2, 3, 4, and portable building 3 are all modified bituminous and failing, and have blisters in the membrane; and interior ceiling tiles are warped and stained (SCUSD 2020b).

The rebuild of the project site would result in new and modernized buildings that meet the California Department of Education's (CDE) safety standards; upgraded play equipment, field, and hardcourts; and improved and safer access and circulation.

Access and Circulation

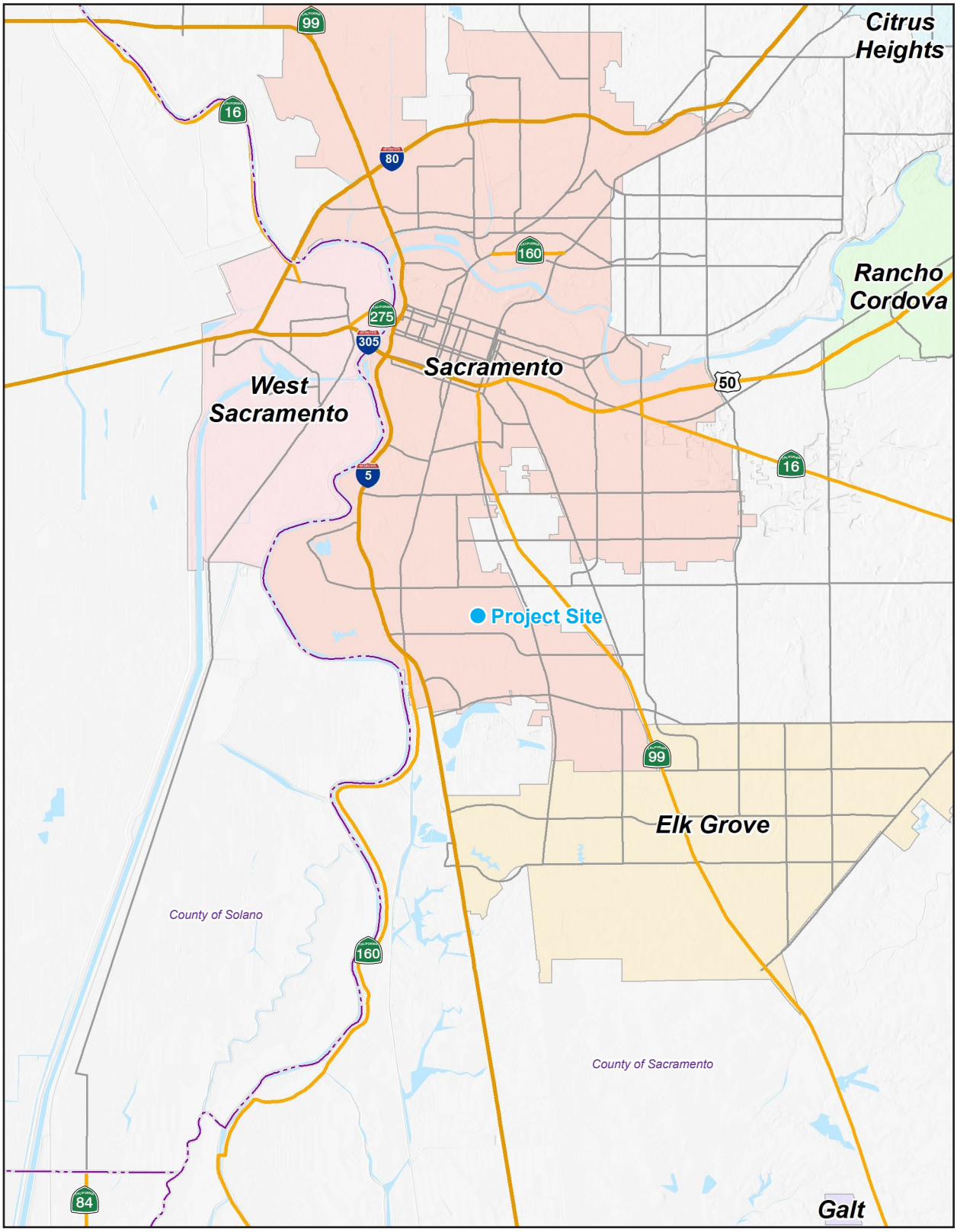
The schools' driveways and parking lots are located at the southern portion of the site.

Ingress and egress into Chavez Elementary School are provided via a driveway on 32nd Street. A 180-foot passenger loading area is located at the end of the parking lot which contains approximately 50 parking spaces. A bus drop-off zone is located on 32nd Street, north of the driveway on 32nd Street.

Ingress and egress in Kemble Elementary are provided via a driveway on 29th Street. A 220-foot passenger loading area and bus drop-off is located at the western portion of the project site, along 29th Street. The parking lot contains approximately 44 parking spaces.

A fence separates the parking lots of the two schools.

Figure 1 - Regional Location



County Boundary

Note: Unincorporated county areas are shown in gray.

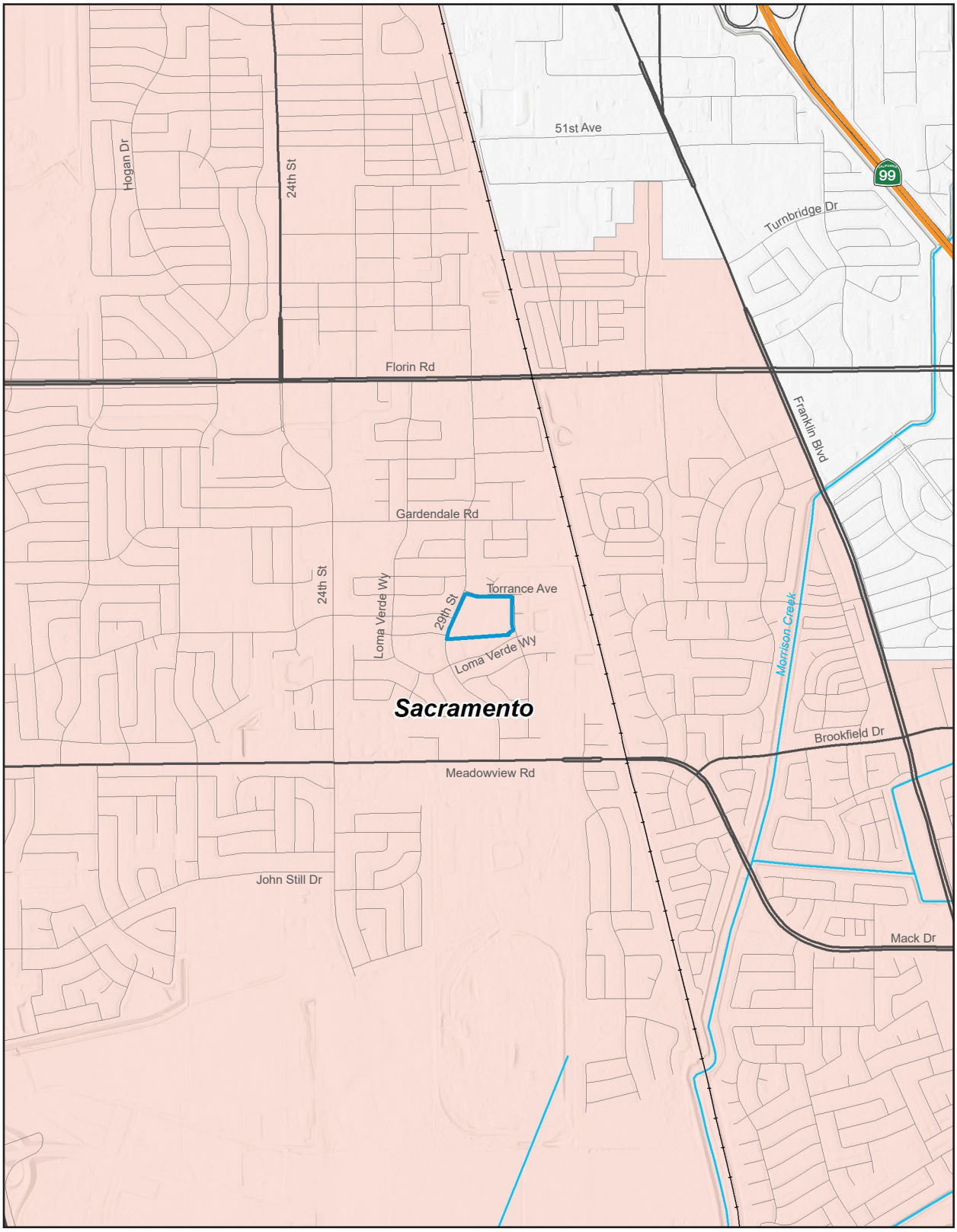
Source: Generated using ArcMap, Inc., 2023.

0 3
Scale (Miles)

1. Introduction

This page intentionally left blank.

Figure 2 - Local Vicinity



Project Site

Note: Unincorporated county areas are shown in gray.

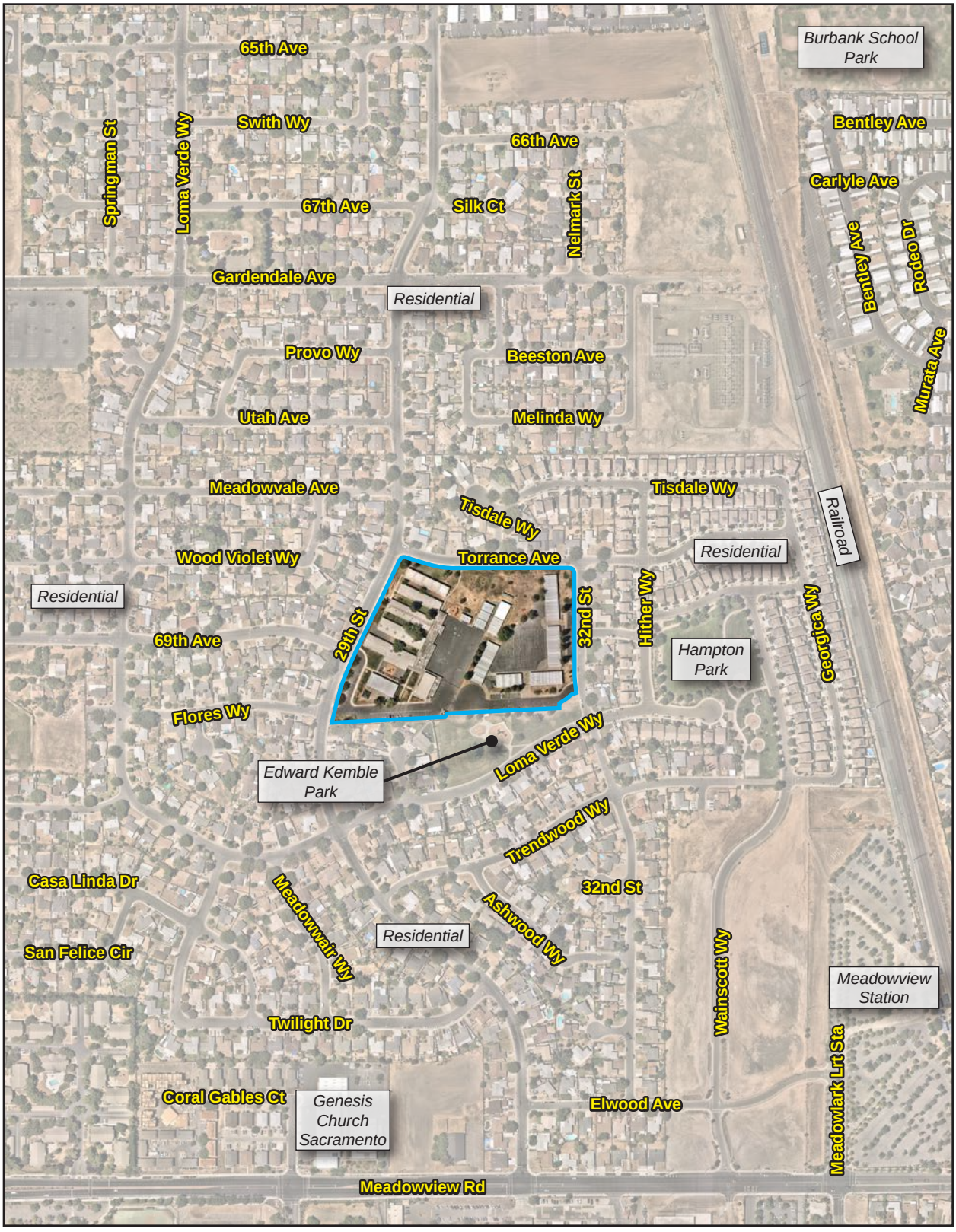
Source: Generated using ArcMap, Inc., 2023.

0 2,000
Scale (Feet)

1. Introduction

This page intentionally left blank.

Figure 3 - Aerial Photograph



Project Site

0 550
Scale (Feet)

Source: Narmap, Inc., 2023.

1. Introduction

This page intentionally left blank.

Figure 4a - Site Photographs

View of Edward Kemble Park.

View of 32nd Street.

Source: PlaceWorks, Inc., 2023.

1. Introduction

This page intentionally left blank.

Figure 4b - Site Photographs

View of Edward Kemble Elementary School.

View of Edward Kemble Elementary School.

Source: PlaceWorks, Inc., 2023.

1. Introduction

This page intentionally left blank.

Figure 4c - Site Photographs

View of Cesar Chavez Elementary School.

View of Cesar Chavez Elementary School.

Source: PlaceWorks, Inc., 2023.

1. Introduction

This page intentionally left blank.

Operations

Kemble Elementary School

Kemble Elementary School is one of 75 schools operated by the District and serves students from transitional kindergarten through the 3rd-grade. All grades at the school start at 9 AM and are dismissed at 2:57 PM on Mondays, Tuesdays, Wednesdays, and Fridays, and at 1:57 PM on Thursdays.

The 2021-2022 school year enrolled 502 students. Table 1, *Kemble Elementary School 10-Year Enrollment History,* shows the 10-year enrollment history for Kemble Elementary School. The highest enrollment of 602 students occurred in the 2017-2018 school year. Kemble Elementary School's current capacity is 744 students (35 classrooms).

Table 1 Kemble Elementary School 10-Year Enrollment History

School Year	Enrollment
2021-2022	502
2020-2021	521
2019-2020	565
2018-2019	564
2017-2018	602
2016-2017	547
2015-2016	548
2014-2015	565
2013-2014	511
2012-2013	526
10-Year Average Enrollment:	**545**

Source: CDE 2022a

Chavez Elementary School

Chavez Elementary School is one of 75 schools operated by the District and serves students in grades 4 through 6. All grades at the school start at 9 AM and are dismissed at 3:02 PM on Mondays, Tuesdays, Wednesdays, and Fridays, and at 2:02 PM on Thursdays.

The 2021-2022 school year enrolled 354 students. Table 2, *Chavez Elementary School 10-Year Enrollment History,* shows the 10-year enrollment history for Chavez Elementary School. The highest enrollment of 406 students occurred in the 2016-2017 school year. Chavez Elementary School's current capacity is 594 students (20 classrooms).

Table 2 Chavez Elementary School 10-Year Enrollment History

School Year	Enrollment
2021-2022	354
2020-2021	366
2019-2020	357
2018-2019	374
2017-2018	384
2016-2017	406
2015-2016	346
2014-2015	352
2013-2014	350
2012-2013	329
10-Year Average Enrollment:	**362**

Source: CDE 2022b

The total current capacity at both schools is 1,338 students (55 classrooms).

1.2.2 Surrounding Land Uses

The project site is in a residential community with primarily single-family residences. The site is surrounded by the land uses described below.

- **North:** Torrance Avenue and single-family residences.
- **East:** 32nd Street and single-family residences.
- **South:** Kemble Park and single-family residences.
- **West:** 29th Street and single-family residences.

1.3 EXISTING ZONING AND GENERAL PLAN

The City of Sacramento General Plan Land Use Designation for the project site is Public/Quasi-Public and the zoning designation is R-1 (Standard Single Family). Under the R-1 Zone, a Conditional Use Permit is required for schools (K-12), according to Section 17.204.210, R-1 Zone – Permitted Uses, of the Sacramento Municipal Code. As the project site currently operates as a school, the District does not need to apply for a Conditional Use Permit. Additionally, the District may exempt the site from local zoning under its authority, pursuant to Government Code 53094. The properties surrounding the site have a Land Use Designation of Suburban Neighborhood Low Density and Kemble Park is designated Parks and Recreation; the surrounding uses are also zoned R-1.

1.4 DISTRICT ACTION REQUESTED

The Initial Study/Mitigated Negative Declaration examines the potential environmental impacts of the proposed Chavez-Kemble Elementary School Rebuild project (proposed project). This Initial Study/Mitigated Negative Declaration is also being prepared to address various actions by the District to adopt and implement

the proposed project. It is the intent of this Initial Study/Mitigated Negative Declaration to enable the District to make an informed decision with respect to the proposed project. The District is required to approve the Initial Study/Mitigated Negative Declaration prior to approving the proposed project.

1.5 PROJECT DESCRIPTION

1.5.1 Proposed Land Use

The District plans to fully redesign and reconstruct the project site and combine Chavez Elementary School and Kemble Elementary School into one school building—the new school is yet to be formally renamed. The capacity of the proposed school would decrease from 1,338 students to 850 students; buildings would be limited to two stories; and access to the site would be via driveways on 32nd Street, 29th Street, and Torrance Avenue. The District plans to seek matching State funds, which will trigger the need for California Department of Education (CDE) and Department of Toxic Substances Control (DTSC) approvals in addition to the CEQA process. The construction would be phased to accommodate students remaining onsite during construction. The District submitted plans to California Division of the State Architect (DSA) in November 2022 for the interim housing and plans to submit to DSA in May 2023 for the site work and July 2023 for the buildings/final site plan. Construction is estimated to start approximately June 2023 and construction activities would end approximately August 2025. School opening would be planned for Fall 2025. Figure 5, *Conceptual Site Plan,* shows the proposed improvements and location of the new facilities.

Facilities

Under the proposed project, the school capacity would decrease from 1,338 students to 850 students, and the square footage of the buildings onsite would decrease from 72,907 square feet to 70,086 square feet. A total of three buildings would be located on the eastern portion of the site, the hardcourts would be located in the central portion of the site, and the soccer field would be on the western portion of the site. All proposed buildings would be designed to be all-electric.

Building A – Administration, Library, and Flex Lab Building

Building A would be approximately 7,677 square feet and would include a library/media center, flex lab, and office and administration. Building A would be one-story and consist of cement plaster and fiber cement siding, single-ply roofing system, and a Type V-B sprinklered, steel frame.

Building C – Two-Story Classroom Building

Building C would be approximately 47,559 square feet and would be two stories. The first level would include seven transitional kindergarten/kindergarten classrooms, five first-grade classrooms, and five second-grade classrooms. The first- and second-grade classrooms would share one collaboration room and outdoor learning space per grade level. There would be seven transitional kindergarten/kindergarten classrooms that would share one outdoor learning garden space. The first level also includes one Special Education (SPED) classroom; separate restrooms for transitional kindergarten/kindergarten, first-grade, and second-grade; and storage, custodian, and break-out spaces.

The second level would include five third-grade classrooms, and four classrooms each for grades four through 6. All third- through sixth-grade classrooms would share a collaboration room, per grade level. The second level would also include a flex lab, storage rooms, break-out rooms, custodian room, and restrooms. There would be one SPED classroom on the second level.

Building C would consist of cement plaster and fiber cement siding, single-ply roofing system, rooftop mechanical units, and a Type II-B sprinklered, steel frame.

Building M – Multipurpose Building

Building M would be one-story and approximately 11,144 square feet. Building M would include a multi-purpose court/gym, stage, kitchen and servery, and family room. An outdoor covered dining area for approximately 200 students would also be located outside of Building M. The outdoor covered area would be approximately 4,283 square feet. Building M would consist of cement plaster and fiber cement siding, single-ply roofing system, rooftop mechanical units, and Type II-B sprinklered, steel frame.

Outdoor Spaces

The hardcourts, which are approximately 1.03 acres, are located to the west of the buildings. The 1.74-acre soccer field is to the west of the hardcourts. Landscaping and walkways are proposed throughout the site. The proposed soccer field would be available for community use as part of an approved permit. The field would be accessible via a gate at the street entrance and the parking lot would be accessible during this time. When the soccer field is not being used after school hours, it would remain locked. The project site would have two layers of security (perimeter fencing and interior campus security).

Access and Circulation

A short-term transitional kindergarten/kindergarten parking lot with approximately 22 spaces and parent drop-off would be located at the northern portion of the site and would be accessible via two driveways on Torrance Avenue. Additionally, the bus drop-off would be located approximately within the same location as it currently exists—on the eastern portion of the site with ingress/egress driveways along 32nd Street. At the southeastern portion of the site, a parking lot with approximately 44 spaces, including electric vehicle (EV)-charging stations, would be accessible via a driveway on 32nd Street. At the southwestern portion of the site, a staff parking lot with approximately 45 spaces, a visitor parking lot with approximately 21 spaces, and parent drop-off would be accessible via a driveway on 29th Street; the existing passenger loading area on 29th Street would be removed. The fence separating the two existing parking lots in the southern portion of the site would be removed. Walkways from Kemble Park would provide access into the project site's parking lot. A total of approximately 132 parking spaces would be provided onsite. The proposed project would include installation of EV charging station infrastructure, as required by the 2019 California Building Standards Code (CBSC).

Lighting

The existing buildings have exterior lighting. Upon project completion, parking light poles and security lighting throughout the school would be installed. No lighting is proposed for the field. Evening events would end by 8 PM.

1.5.2 Project Phasing

To accommodate students at the site, redevelopment of the site would occur in two phases to allow students to remain on campus during construction.

During Phase 1, students would utilize the existing Kemble Elementary School buildings and portable buildings relocated for interim housing. Approximately 15 portable buildings would be relocated while demolition and construction activities are underway at the Chavez Elementary School site (eastern portion), and approximately five portable buildings would be removed. The existing portable buildings are at grade level and once relocated, would be put on wood skids with new ramps and stairs to access the platform connecting the buildings. Upon completion of construction of the buildings on the eastern portion of the site, students would move into the new buildings, while construction activities on the western portion commence (Phase 2).

The District will request approval of a Memorandum of Understanding (MOU) with the City of Sacramento to use Kemble Park as a playfield during construction. The park would be fenced to ensure student safety and the fencing would be removed upon project completion.

Construction

Construction activities would include building and asphalt demolition and excavation, site preparation and rough grading, utility trenching, fine grading, building construction, architectural coating, asphalt paving, finishing, and landscaping. All proposed improvements and areas of disturbance would occur within the project site, with the exception of temporary fencing at Kemble Park, which would be used as a playfield while construction is underway. Construction is proposed to take place between the hours of 7 AM and 6 PM Monday through Saturday and between 9 AM to 6 PM on Sunday, as allowed in Section 8.68.080, Exemptions, of the City's Municipal Code.

A construction worksite traffic control plan would be prepared and implemented by the District. The plan would identify haul routes, hours of construction, protective devices, warning signs, and access. The active construction and staging areas would be located on the project site.

The estimated construction phasing and duration is as follows:

Phase 1

- Construction of Interim Housing: June 2023 – August 2023 (3 months)

Phase 2

- Site Work Underground Utilities and Grading – Construction: September 2023 – December 2025 (5 months)
- New Building(s) Construction: January 2024 – June 2025 (21 months)
- Demolition of Existing Buildings and Installation of Fields/Parking: June 2025 – August 2025 (3 months)

Figure 5 - Conceptual Site Plan

SHEET KEYNOTES

01	STAFF PARKING +/- 64 SPACES
02	VISITOR PARKING +/- 42 SPACES
03	SHORT-TERM PARKING FOR KINDER DROP-OFF +/- 20 SPACES
04	ELECTRIC VEHICLE CHARGING STATIONS SPACES
05	PARENT DROP-OFF
06	BUS DROP-OFF
07	MAIN ENTRY GATES
08	UTILITY & TRASH ENCLOSURE
09	OUTDOOR STUDENT QUAD AREA
11	PHOTOVOLTAIC CANOPY
13	OUTDOOR DINING CANOPY
14	GRADES 1ST - 6TH PLAYGROUND/HARDCOURT
15	U-14 SOCCER FIELD
22	RUNNING TRAIL AROUND SOCCER FIELD
23	CAMPUS PERIMETER DECORATIVE FENCING & GATES
24	KINDERGARTEN PLAY AREA
25	COVERED PLAY STRUCTURE
26	ELECTRONIC MARQUEE
27	BLACK VINYL COATED CHAINLINK FENCING & GATES

0 100
Scale (Feet)

Source: Lionakis, 2022.

1. Introduction

This page intentionally left blank.

2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** Chavez-Kemble Elementary School Rebuild Project

2. **Lead Agency Name and Address:**
   Sacramento City Unified School District
   425 1st Avenue
   Sacramento, CA 95818

3. **Contact Person and Phone Number:**
   Nathaniel Browning, Facilities Director
   Facilities Support Services
   916.257.9640

4. **Project Location:** The 8.71-acre site encompasses two schools, Kemble Elementary School on 7495 29th Street and Chavez Elementary School at 7500 32nd Street, both in the City of Sacramento. The Assessor's Parcel Number (APN) for Kemble Elementary School is 049-0183-002 and the APN for Chavez Elementary School is 049-0176-002.

5. **Project Sponsor's Name and Address:**
   Sacramento City Unified School District
   425 1st Avenue
   Sacramento, CA 95818

6. **General Plan Designation:** Public/Quasi-Public

7. **Zoning:** R-1

8. **Description of Project:**
   The District plans to fully redesign and reconstruct the project site and combine Chavez Elementary School and Kemble Elementary School into one school campus—yet to be renamed. The capacity of the proposed school would decrease from 1,338 students to 850 students; buildings would be limited to two stories; and access to the site would be via driveways on 32nd Street, 29th Street, and Torrance Avenue.

9. **Surrounding Land Uses and Setting:**
   The project site is bound by residential uses along Torrance Avenue to the north, residential uses along 32nd Street to the east, Kemble Park and residential uses to the south, and residential uses along 29th Street to the west of the project site. The project site is approximately 0.19-mile west of a railway.

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

- City of Sacramento
- California Department of Education, School Facilities Planning Division (CDE)
- California Department of General Services, Division of State Architect (DSA)
- Central Valley Regional Water Quality Control Board

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

> Note: Conducting consultation early in the CEQA process allows tribal governments, lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to tribal cultural resources, and reduce the potential for delay and conflict in the environmental review process. (See Public Resources Code section 21080.3.2.) Information may also be available from the California Native American Heritage Commission's Sacred Lands File per Public Resources Code section 5097.94 and the California Historical Resources Information System administered by the California Office of Historic Preservation. Please also note that Public Resources Code section 21082.3I contains provisions specific to confidentiality.

Per District policy, the District sent Assembly Bill 52 (AB 52) notification letters to the following tribes on March 14, 2023: Wilton Rancheria, Buena Vista Rancheria, Shingle Springs Rancheria, Upper Lake Rancheria, and the United Auburn Indian Community of the Auburn Rancheria. The Wilton Rancheria and United Auburn Indian Community of the Auburn Rancheria Tribes responded, and their recommendations have been incorporated into the IS/MND. See Section 3.18, *Tribal Cultural Resources,* for more information.

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Nathaniel H. Browning — *Signature*

3/31/23 — *Date*

Nathaniel H. Browning

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

4. "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level.

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

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

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

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

6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.

7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.

2. Environmental Checklist

8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project's environmental effects in whatever format is selected.

9. The explanation of each issue should identify:

    a) the significance criteria or threshold, if any, used to evaluate each question; and
    b) the mitigation measure identified, if any, to reduce the impact to less than significance.

This page intentionally left blank.

3. Environmental Analysis

This section provides an evaluation of the impact categories and questions contained in the checklist and identifies mitigation measures, if applicable.

3.1 AESTHETICS

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

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a) Have a substantial adverse effect on a scenic vista?			X	
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				X
c) In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X	

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

Less Than Significant Impact. A scenic vista is a viewpoint that provides expansive views of a highly valued landscape for the benefit of the public. The Environmental Resources Element of the City's General Plan lists the Sacramento and American Rivers and adjacent greenways, landmarks, and the State Capitol as scenic resources. The project site is not adjacent to such scenic resources; the project site is surrounded by residential uses. The project site is currently developed as a school site and upon project completion, the project site would continue to be used as an elementary school. Therefore, the proposed project would not obstruct or alter scenic resources. Impacts would be 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 closest designated state scenic highway is State Route 160 (SR-160), approximately 2 miles southwest of the project site (Caltrans 2022). Due to the distance and intervening structures, project

development would not result in impacts to scenic resources within a designated state scenic highway. Therefore, no impact would occur.

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

Less Than Significant Impact. The project site is located within a fully urbanized area with development surrounding the site in all directions. The project site currently has two schools and upon project completion, the project site would continue to be used as an elementary school. Therefore, the proposed project is consistent with its R-1 zoning. There are no scenic resources visible from the perimeter of the campus. The proposed project would not adversely affect scenic views as none exist in the area. The project area is a residential community.

The proposed project would not substantially change the existing character of the site. The proposed project would be compatible with the existing development pattern onsite and the character of the surrounding area. Building materials and colors would complement the existing development on adjacent properties. The proposed buildings would have white, cream, and gray cement plaster and fiber cement siding or metal paneling, which would complement the colors and building materials used in the surrounding area. Although the visual qualities of the project site during construction would not appear better than the existing condition of the properties, the construction worksite would be temporary. The finished project would include landscaping and new buildings and exterior finishes that would complement the surrounding structures. Compared to current conditions, which includes buildings on the eastern and western portions of the site, the proposed project would consolidate the proposed buildings to the eastern portion of the site and the proposed soccer field would be on the western side of the site. Therefore, although project implementation would alter the visual appearance of the site, the improvements would not substantially degrade the visual character and quality of the project site and surrounding area. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The two major causes of light pollution are glare and spill light. Spill light is caused by misdirected light that illuminates areas outside the intended area to be lit. Glare occurs when a bright object is against a dark background, such as oncoming vehicle headlights or an unshielded light bulb. The project site currently generates light from its buildings (interior and exterior) and parking lot. Vehicle headlights, streetlights, and exterior and interior building lights also exist in the surrounding area.

The proposed buildings would have cement paneling and fiber cement siding or metal paneling that are not reflective. Parking light poles and security lighting throughout the school would be installed. The proposed project does not include field lighting. The proposed lighting would be directed onto the intended area to be lit and would not spill off the campus. Light and glare levels caused by the proposed project would not be substantially greater than existing levels. Therefore, light and glare impacts would be less than significant.

3.2 AGRICULTURE AND FORESTRY RESOURCES

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

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
II. AGRICULTURE AND FORESTRY RESOURCES. **In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:**					
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				X
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				X
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				X
d)	Result in the loss of forest land or conversion of forest land to non-forest use?				X
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

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

No Impact. The project site has no agricultural or farm use on it, nor is there agricultural or farm use in its immediate proximity. No project-related farmland conversion impact would occur. The project site is fully

developed and is not mapped as important farmland by the Division of Land Resource Protection; the site is mapped as "Urban and Built-Up Land" (CDC 2022a). No impact would occur.

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

No Impact. The zoning designation for the project site is R-1. The proposed project would not conflict with agricultural zoning or a Williamson Act contract as it is not zoned for agricultural use. Williamson Act contracts restrict the use of privately-owned land to agriculture and compatible open space uses under contract with local governments; in exchange, the land is taxed based on actual use rather than potential market value. There is no Williamson Act contract in effect onsite. No impact would occur.

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

No Impact. Project development would not conflict with existing zoning for forest land, timberland, or timberland production. Forest land is defined as "land that can support 10-percent native tree cover of any species, including hardwoods, under natural conditions, and that allows for management of one or more forest resources, including timber, aesthetics, fish and wildlife, biodiversity, water quality, recreation, and other public benefits" (California PRC § 12220[g]). Timberland is defined as "land…which is available for, and capable of, growing a crop of trees of any commercial species used to produce lumber and other forest products, including trees" (California PRC § 4526). The project site is zoned as R-1. No Impact would occur.

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

No Impact. Vegetation onsite is limited to scattered ornamental trees, shrubs, and ground cover. Project construction would not result in the loss or conversion of forest land. Project development would not cause a loss of forest land. No impact would occur.

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

No Impact. Maps from the Division of Land Resource Protection indicate that there is no important farmland or forest land on the project site or within the surrounding vicinity. Project development would not indirectly cause conversion of such land to nonagricultural or non-forest use. No impact would occur.

3.3 AIR QUALITY

The analysis in this section is based in part on the following:

- *Air Quality and Greenhouse Gas Emissions Analysis,* PlaceWorks, January 2023

A complete copy of the report is included in Appendix A to this Initial Study.

3. Environmental Analysis

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

Air Pollutants of Concern

Criteria Air Pollutants

Pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and State law under the National and California Clean Air Act, respectively. Air pollutants are categorized as primary and/or secondary pollutants. Primary air pollutants are those that are emitted directly from sources. Carbon monoxide (CO), reactive organic gases (ROG), nitrogen oxides (NO_X), sulfur dioxide (SO_2), coarse inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), and lead (Pb) are primary air pollutants. Of these, all of them except for ROGs are "criteria air pollutants," which means that ambient air quality standards (AAQS) have been established for them. The National and California AAQS are the levels of air quality considered to provide a margin of safety in the protection of the public health and welfare. They are designed to protect those "sensitive receptors" most susceptible to further respiratory distress, such as asthmatics, the elderly, very young children, people already weakened by other disease or illness, and persons engaged in strenuous work or exercise. Healthy adults can tolerate occasional exposure to air pollutant concentrations considerably above these minimum standards before adverse effects are observed.

Areas are classified under the federal and California Clean Air Act as either in attainment or nonattainment for each criteria pollutant based on whether the AAQS have been achieved. The Sacramento Valley Air Basin (SVAB), which is managed by the Sacramento Metro Air Quality Management District (SMAQMD), is nonattainment area for California and National O_3 and National $PM_{2.5}$ AAQS (SMAQMD 2022). SMAQMD has identified thresholds of significance for criteria pollutant emissions and criteria air pollutant precursors, including ROG, NO_X, PM_{10}, and $PM_{2.5}$. Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard, contribute substantially to an existing or projected air quality violation, or substantially contribute to health impacts.

Toxic Air Contaminants

In addition to criteria air pollutants, both the State and federal government regulate the release of TACs. The California Health and Safety Code define a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal Clean Air Act (42 United States Code Section 7412[b]) is a toxic air contaminant. Under State law, the California Environmental Protection Agency, acting through the California Air Resources Board (CARB), is authorized to identify a substance as a TAC if it determines that the substance is an air pollutant that may cause or contribute to an increase in mortality or serious illness, or may pose a present or potential hazard to human health. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

Would the project:

Issues		Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
III. AIR QUALITY. Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations. Would the project:					
a)	Conflict with or obstruct implementation of the applicable air quality plan?			X	
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?			X	
c)	Expose sensitive receptors to substantial pollutant concentrations?			X	
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			X	

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

Less Than Significant Impact. A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the 2017 Sacramento Regional 2008 8-Hour Ozone Attainment and Further Reasonable Progress Plan (Sacramento Ozone Plan). Air Districts in the Sacramento region prepared the Sacramento Ozone Plan, which stands as the applicable air quality plan for the region, as a revision to the California State Implementation Plan (SIP) (CARB 2018). The Sacramento Ozone Plan demonstrated that the Sacramento Area would attain ozone standards in 2024 and contained the required planning elements including an emission inventory, reasonable further progress (RFP) demonstration with a baseline year of 2012, transportation conformity budgets for the years 2020 and 2023, and RFP and attainment contingency provisions.

The SIP plans and control measures are based on information derived from regional growth projections based on general plans developed by Sacramento County to forecast future emission levels in the SVAB. As such, projects that proposed development consistent with the growth anticipated or development that is less dense that is associated with the Sacramento General Plan would be consistent with the SIP. Changes in population, housing, or employment growth projections have the potential to affect SMAQMD's demographic projections and therefore the assumptions in SIP. Typically, only large, regionally significant projects have the potential to affect the regional growth projections.

The proposed project involves the redesign and reconstruction of the project site to combine Chavez Elementary School and Kemble Elementary School into one school—yet to be named. As discussed in Section 3.14, *Population and Housing*, the new students that would fill the new classrooms would be existing residents living within the District's service boundary, and the proposed project would not directly increase population growth in the area. The project site is currently designated Public/Quasi-Public and Standard Single Family (R-1) and the District does not need to apply for a Conditional Use Permit since the project site currently operates

as a school. Therefore, the proposed land use development would be consistent with the City of Sacramento Zoning Ordinance.

Additionally, based on the scope and nature of the proposed project, it is anticipated to generate fewer than 1,000 jobs and would develop less than 500,000 square feet of business floor space. Thus, it would not meet the criteria for a project of statewide, regional, or areawide significance established under CEQA Guidelines Section 15206(b)(2). Therefore, the proposed project would not affect the regional emissions inventory or conflict with strategies in the SIP and impacts would be less than significant.

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

Less Than Significant Impact. As stated, the SVAB is designated under the California and Federal AAQS as nonattainment for O_3 and under the California AAQS as nonattainment for $PM_{2.5}$ (SMAQMD 2022). Any project that produces a significant project-level regional air quality impact in an area that is in nonattainment adds to the cumulative impact. Air quality impacts of the proposed project were evaluated based on the *Guide to Air Quality Assessment in Sacramento County* (CEQA Guide) (SMAQMD 2009). Development projects below the regional significance thresholds are not expected to generate sufficient criteria pollutant emissions to violate any air quality standard or contribute substantially to an existing or projected air quality violation. The following describes project-related impacts from short-term construction activities and long-term operation of the proposed project.

SMAQMD also released its *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* in October 2020 to provide methodology to assess the specific correlation between mass emissions generated and the effect of health raised in *Sierra Club v. County of Fresno* (Friant Ranch, L.P.) (2018) 6 Cal.5th 502, Case No. S21978 (SMAQMD 2020c). This guidance document was developed with input from Yolo-Solano AQMD, Placer County Air Pollution Control District, El Dorado County Air Quality Management District, and Feather River Air Quality Management District. These air districts, in addition to SMAQMD, comprises the Sacramento Federal Nonattainment Area (SFNA) and the Five-Air-District Region.

The Friant Ranch guidance document provides insight on the health effects that may result from a project emitting at the maximum thresholds of significance (TOS) levels in the Five-Air-District Region for NO_X, VOCs, PM, CO, and SO_X. It includes two look-up tables for estimating health effects for strategic areas where growth exceeding the TOS level is anticipated. For purposes of the look-up tables, a TOS level of 82 lbs/day, which represents the highest TOS level between the thresholds established by the SFNA air districts, is utilized. The Minor Project Health Effects Screening Tool uses the location of a project to estimate interpolated health effects based on the TOS level of 82 lbs/day and the health effects of 41 hypothetical sources. The Strategic Area Project Screening Modeling tool uses the NO_X, VOC, and $PM_{2.5}$ emissions of a project to interpolate health effects based on the health effects of six potential strategic area project locations at levels two and eight times the 82 lbs/day TOS level. The health effects of criteria pollutant emissions at the TOS level are conservative estimates that can be used in environmental documents.

Regional Short-Term Construction Impacts

Construction activities produce combustion emissions from various sources, such as on-site heavy-duty construction vehicles, vehicles hauling materials to and from the site, and motor vehicles transporting the construction crew. Site preparation activities produce fugitive dust emissions (PM_{10} and $PM_{2.5}$) from demolition and soil-disturbing activities, such as grading and excavation. Air pollutant emissions from construction activities on site would vary daily as construction activity levels change. Construction activities associated with the project would result in emissions of ROG, NO_X, CO, PM_{10}, and fine $PM_{2.5}$.

Construction Fugitive Dust

Ground disturbing activities during construction would generate fugitive dust (PM_{10} and $PM_{2.5}$). The amount of dust generated during construction would be highly variable and is dependent on the amount of material being disturbed, the type of material, moisture content, and meteorological conditions. If uncontrolled, PM_{10} and $PM_{2.5}$ levels downwind of actively disturbed areas could possibly exceed State standards. The proposed project would be subject SMAQMD's Rule 403, *Fugitive Dust*, and implementation of the SMAQMD's Basic Construction Emission Control Practices (BMPs) to reduce impacts related to fugitive dust to less than significant.

Construction Exhaust Emissions

The proposed project would result in demolition, site preparation, grading, building construction, paving, and architectural coating that would span over two phases. Analysis of construction emissions is based on the preliminary construction duration for the two construction phases and normalized CalEEMod default schedule developed for the proposed project. As noted in Section 1.5.2, *Project Description*, construction of the proposed project would involve demolition of the existing building/asphalt construction and construction of interim housing during Phase 1 and site preparation, site work underground utilities and grading, new building construction, landscaping, temporary building and asphalt demolition, and installation of fields and parking lot during Phase 2. It should be noted, however, that due to the distinct, non-overlapping nature of the demolition of the temporary buildings/asphalt and installation of the fields/parking lot at the end of Phase 2, these certain activities were modeled separately as P2.2 while all preceding activities in Phase 2 were modeled as P2.1.

A quantified analysis of the proposed project's construction emissions was conducted using the California Emissions Estimator Model (CalEEMod) Version 2022.1 based on information provided by the project applicant and default equipment mix for each construction phase. Phase 1 is assumed to begin in June 2023 to September 2023, Phase 2.1 would begin in September 2023 to June 2025, and Phase 2.2 would begin June 2025 to September 2025.

Potential construction-related air quality impacts are determined by comparing the average daily criteria air pollutants emissions generated by the proposed project-related construction activities to the SMAQMD significance thresholds in Table 3, *Average Daily Regional Construction Emissions*. Average daily emissions are based on the annual construction emissions divided by the total number of active construction days.

3. Environmental Analysis

Table 3 Average Daily Regional Construction Emissions

Average Daily Emissions	Average Daily Criteria Air Pollutants (average lbs/day)[1, 2, 3]			
	ROG	NO_X	Exhaust PM_{10}	Exhaust $PM_{2.5}$
Phase 1	<1	1	<1	<1
Phase 2.1	2	9	<1	<1
Phase 2.2	<1	<1	<1	1
SMAQMD Average Daily Project-Level Thresholds	**NA**	**85**	**80**	**80**
Exceeds Average Daily Threshold?	No	No	No	No

Source: CalEEMod, Version 2022.1

Notes:

[1] Air quality modeling based on a construction schedule and information provided by the District. Where specific information regarding project-related construction activities was not available, construction assumptions were based on CalEEMod defaults, which are based on construction surveys conducted by SCAQMD of construction equipment and phasing for comparable projects.

[2] Includes implementation of fugitive dust control measures required by SMAQMD under Rule 403, including watering disturbed areas a minimum of two times per day, reducing speed limit to 15 miles per hour on unpaved surfaces, replacing ground cover quickly, and street.

[3] P1 includes demolition of the existing building/asphalt and construction of interim housing, P2.1 includes the new building construction and associated site preparation, site work underground utilities and grading, and P2.2 includes demolition of the existing buildings/asphalt and installation of the fields/parking lot.

As shown above in Table 3, criteria air pollutant emissions from construction equipment exhaust would not exceed the SMAQMD average daily thresholds. Therefore, impacts from project-related construction activities to the regional air quality would be less than significant.

Long-Term Operation-Related Impacts

Typical long-term air pollutant emissions generated by a land use would be generated by area sources (e.g., landscape fuel use, aerosols, and architectural coatings), mobile sources from vehicle trips, and energy use (natural gas) associated with the land use, as applicable. As the proposed project only involves a redesign and reconstruction of the project site to combine Chavez Elementary School and Kemble Elementary School into one school, it would result in a decrease in student capacity. Furthermore, the proposed buildings would, at minimum, be designed and built to meet the 2019 Building Energy Efficiency Standards and the 2019 California Green Building Standards Code (CALGreen). Thus, these buildings would be substantially more energy efficient than the existing buildings. Therefore, operation of the proposed project would not result in an increase in emissions compared to existing conditions and would not exceed the SMAQMD regional significance thresholds. Therefore, impacts to the regional air quality associated with operation of the project would be less than significant.

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact. The significance of localized project impacts depends on whether the project would cause substantial concentrations of criteria air pollutants for which the SMAQMD is designated as nonattainment under the California or National AAQS.

CO Hotspots

Areas of vehicle congestion have the potential to create pockets of CO, called hotspots. These pockets have the potential to exceed the State 1-hour standard of 20 ppm or the 8-hour standard of 9.0 ppm. Since CO is produced in the greatest quantities from vehicle combustion and does not readily disperse into the atmosphere, adherence to AAQS is typically demonstrated through an analysis of localized CO concentrations. Hotspots are typically produced at intersections, where traffic congestion is highest because vehicles queue for longer periods and are subject to reduced speeds.

An overarching goal of the 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS) for the Sacramento region is to concentrate development in areas Within existing urban areas rather than allocate new growth in outlying areas where substantial transportation investments would be necessary to achieve the per capita passenger vehicle VMT and associated GHG emissions reductions (SACOG 2019). The proposed project would serve the local population and is located in close proximity to existing roadways, transit, and bicycle and predestination routes. Thus, the proposed project would be consistent with the overall goals of the 2020 MTP/SCS and would not hinder the capital improvements outlined in the Sacramento Area Council of Government's (SACOG) Congestion Management Process (CMP).

Furthermore, under existing and future vehicle emission rates, a project would have to increase traffic volumes at a single intersection to more than 44,000 vehicles per hour—or 24,000 vehicles per hour where vertical and/or horizontal air does not mix—in order to generate a significant CO impact (BAAQMD 2017a). As mentioned in the traffic/transportation analysis, the proposed project would not result in an increase in student capacity and the traffic associated with these students and staff would be traveling on the area's roadway network regardless of the status of this proposed project. Since the there would be no increase in traffic volumes and as the proposed project would be well below the CEQA VMT threshold of 110 trips per day; the proposed project can be screened from any further CEQA VMT analysis. Therefore, overall, the proposed project would not have the potential to substantially increase CO hotspots at intersections in the SVAB and would not result in significant impacts relative to VMT.

In addition, the potential for CO hotspots to be generated in the SVAB is extremely unlikely because of the improvements in vehicle emission rates and control efficiencies. Typical projects would not expose sensitive receptors to substantial pollutant concentrations and analysis of CO hotspots is not warranted. Furthermore, the proposed project would not increase exposure at the project site from proximity to the surrounding roadways and freeways. Therefore, localized air quality impacts related to mobile-source emissions would be less than significant, and no mitigation measures are required.

Health Risk

Construction Community Risk and Hazards

The SMAQMD does not require a health risk assessment to be conducted for short-term emissions from construction equipment and has not established a quantitative threshold of significance for construction-related TAC emissions (SMAQMD 2020b). Emissions from construction equipment primarily consist of diesel particulate matter (DPM) and the estimated risk from breathing DPM is greater than the risk from all other

airborne TACs combined. The Office of Environmental Health Hazards Assessment (OEHHA) has recently adopted new guidance for the preparation of health risk assessments issued in March 2015 (OEHHA 2015). OEHHA has developed a cancer risk factor and non-cancer chronic reference exposure level for DPM, but these factors are based on continuous exposure over a 30-year time frame. No short-term acute exposure levels have been developed for DPM. The proposed project would be developed in approximately 27 months and across two phases, which would limit the exposure to onsite and offsite receptors. Both the SMAQMD and the District currently do not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project. In addition, construction activities would not exceed the SMAQMD's daily significance thresholds. For the reasons stated above, it is anticipated that construction emissions would not pose a threat to onsite and offsite receptors at or near the school, and project-related construction health impacts would be less than significant, and no mitigation measures are required.

Health Effects of Exceeding the Criteria Air Pollutant Thresholds

Contributing to the nonattainment status would also contribute to elevating health effects associated to these criteria air pollutants. Known health effects related to ozone include worsening of bronchitis, asthma, and emphysema and a decrease in lung function. Health effects associated with particulate matter include premature death of people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, decreased lung function, and increased respiratory symptoms. Potential health effects from construction-related $PM_{2.5}$, VOC, and NO_X emissions are listed below and based on the scenario at which a project would generate these criteria air pollutants at 82 lbs/day.

Per the Minor Project Health Effects Screening Tool of the SMAQMD Friant Ranch guidance document, based on the project site location and the default TOS level of 82 lbs/day, the resulting estimated health effects related to $PM_{2.5}$ emissions include the following (see Appendix A):

- Increasing asthma-related emergency room visits for the 0- to 99-year-old age range group by 1.1 incidence, or 0.006 percent of the 18,419 total incidences for this category in the Five-Air-District Region.
- Increasing asthma-related hospital admissions for the 0- to 64-year-old age range group by 0.074 incidence, or 0.004 percent of the total 1,846 incidences for this category in the Five-Air-District Region.
- Increasing respiratory-related hospital admissions for the 65- to 99-year-old age range group by 0.28 incidence, or 0.0014 percent of the total 19,644 incidences for this category in the Five-Air-District Region
- Increasing mortality for the 30- to 99-year-old age range group by 1.9 incidence, or 0.0042 percent of the total 44,766 incidences for this category in the Five-Air-District Region.

Estimated health effects related to VOC and NO_X, represented through the ozone health endpoint, include the following:

- Increasing asthma-related emergency room visits for the 0- to 17-year-old age range group by 0.39 incidence, or 0.0066 percent of the 5,859 total incidences for this category in the Five-Air-District Region.
- Increasing asthma-related emergency room visits for the 18- to 99-year-old age range group by 0.60 incidence, or 0.0048 percent of the 12,560 total incidences for this category in the Five-Air-District Region.

- Increasing respiratory-related hospital admissions for the 65- to 99-year-old age range group by 0.065 incidence, or 0.00033 percent of the total 19,644 incidences for this category in the Five-Air-District Region.
- Increasing mortality for the 0- to 99-year-old age range group by 0.043 incidence, or 0.00014 percent of the total 30,386 incidences for this category in the Five-Air-District Region.

As listed above, the estimated health effects related to $PM_{2.5}$, VOC, and NO_X emissions within the Five-Air District Region due to the proposed project would result in a very small increase over the background incidence of premature deaths. Therefore, the proposed project emissions would have lower estimated health effects compared to this conservative estimate at the maximum 82 lbs/day TOS level and would not have a significance air quality impact.

Operation Phase Community Risk and Hazards

The purpose of this environmental evaluation is to identify the significant effects of the proposed project on the environment, not the significant effects of the environment on the proposed project (*California Building Industry Association v. Bay Area Air Quality Management District [2015] 62 Cal.4th 369 [Case No. S213478]*). In general, CEQA does not require an environmental evaluation to analyze the environmental effects of attracting development and people to an area. However, the environmental evaluation must analyze the impacts of environmental hazards on future users when the proposed project exacerbates an existing environmental hazard or condition or if there is an exception to this exemption identified in the Public Resources Code. Schools, residential, commercial, and office uses do not use substantial quantities of TACs and typically do not exacerbate existing hazards, so these thresholds are typically applied to new industrial projects. However, Section 21151.8 of the Public Resources Code requires evaluation of air quality hazards for school site acquisition or construction of a K-12 schools.

The proposed project involves reconstruction of new classroom facilities to combine and replace the existing elementary schools. In addition, it is within a residential community and is not within a quarter mile of any permitted or non-permitted facilities (e.g., warehousing). Furthermore, there are also no freeways or busy corridors within a quarter mile.[1] Therefore, it is not anticipated that the onsite students and staff would be exposed to an actual or potential endangerment from surrounding emissions sources and carcinogenic and non-carcinogenic impacts would be less than significant. No mitigation measures are required.

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

Less Than Significant Impact. The project site would continue to operate as a school. Therefore, the proposed project would not result in a change in land use that would generate odors and no objectionable odors are anticipated to result from the operational activity of the proposed project. The type of facilities that are considered to have objectionable odors include wastewater treatments plants, compost facilities, landfills, solid waste transfer stations, fiberglass manufacturing facilities, paint/coating operations (e.g., auto body shops), dairy

[1] Roadways that, on an average day, have traffic in excess of 50,000 vehicles in a rural area, as defined in Section 50101 of the Health and Safety Code, and 100,000 vehicles in an urban area, as defined in Section 50104.7 of the Health and Safety Code.

farms, petroleum refineries, asphalt batch plants, chemical manufacturing, and food manufacturing facilities. The proposed project does not fit into these types of facilities and would not generate objectionable odors that would lead to a public nuisance.

During construction activities, construction equipment exhaust, application of asphalt and architectural coatings would temporarily generate odors. However, any construction-related odor emissions would be low in concentration and temporary. Additionally, odors would typically be confined to the immediate vicinity of the construction equipment. By the time such emissions reach any sensitive receptor sites, they would be diluted to well below any level of air quality concern.

Furthermore, the proposed project would be required to comply with SMAQMD Rule 402, *Public Nuisance*, which prohibits the discharge of air contaminants or other materials that would be a nuisance or annoyance to the public.

In summary, construction-related odor emissions would be temporary, and the proposed project is not considered the type of use that would generate odors that would affect a substantial number of people. Additionally, the proposed project is required to comply with SMAQMD Rule 402, and thus odor-related impacts to off-site land uses would be less than significant.

3.4 BIOLOGICAL RESOURCES

The analysis in this section is based in part on the following:

- *Arborist Survey Report for the Edward Kemble and Cesar Chavez Elementary Schools Project*, ECORP Consulting, Inc., February 21, 2023

A complete copy of the report is included in Appendix B to this Initial Study.

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
IV. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?			X	
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?				X
c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				X

	Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X	
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?		X		
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X	

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

Less Than Significant Impact. The project site is currently developed with a school and is within an urbanized portion of the City. The project site is surrounded by residential uses to the north, south, east, and west, and Kemble Park to the south. Given that the project site and surrounding area are developed and disturbed by human activities, it is unlikely that there are sensitive animal species onsite. Therefore, impacts would be less than significant.

As the proposed project would include the temporary use of Kemble Park during construction activities, the Arborist Report included an analysis of trees on both the project site and Kemble Park (collectively referred to as "study area") (ECORP 2023). A total of 77 trees were inventoried in the study area; which includes 22 California redwood (*Sequoia sempervirens*), seven California sycamore, six valley oak, five crepe myrtle (*Lagerstroemia indica*), five willow oak (*Quercus phellos*), five Chinese elm (*Ulmus parvifolia*), four amur maple (*Acer ginnala*), four velvet ash (*Fraxinus velutina*), four zelkova (*Zelkova* sp.), three knobcone pine (*Pinus attenuate*), two Chinese privet (*Ligustrum sinense*), two liquidambar (*Liquidambar* sp.), one silver maple (*Acer saccharinum*), one deodar cedar (*Cedrus deodara*), one eucalyptus (*Eucalyptus* sp.), one Oregon ash (*Fraxinus latifolia*), one honey locust (*Gleditsia triacanthos*), one Callery pear (*Pyrus calleryana*), one red oak (*Quercus rubra*), and one pepper tree (*Shinus 41ole*) (ECORP 2023). Additionally, one dead tree was inventoried. The proposed project would remove 73 trees. Of the 73 trees proposed for removal, 21 have a high biological value, 31 have a moderate biological value, and 16 have a low biological value. As such, it is recommended that trees with a high biological value be transplanted and trees with a moderate biological value be transplanted or replaced at a ratio of 2:1 or higher during the dormant season (November to February). While none of the trees found in the study area are state or federally listed endangered, threatened, or rare plants, transplanting and/or replacement of the 73 trees would ensure impacts are less than significant.

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

No Impact. The project site is developed with an existing school. No riparian habitats are identified onsite (USFWS 2022). As such, no impacts would occur.

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

No Impact. The project site is currently developed with an existing school. No wetland or drainage areas are identified on the project site (USFWS 2022). Therefore, no impacts would occur to wetlands or drainage areas.

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

Less Than Significant Impact. Wildlife movement corridors facilitate movement of species between large patches of natural habitat. The proposed project is heavily used and is located in an urbanized area. However, the ornamental trees onsite could be used for nesting by birds protected under the Migratory Bird Treaty Act (MBTA) (US Code Title 16, Sections 703-712), and California Fish and Game Code Sections 3503 et seq.

Compliance with the MBTA requires:

- Avoiding grading activities during the nesting season, February 15 to August 15.
- Or, if grading activities are to be undertaken during the nesting season, a site survey for nesting birds by a qualified biologist before commencement of grading activities. If nesting birds are found, the applicant would consult with the USFWS regarding means to avoid or minimize impacts to nesting birds.

Impacts would be less than significant with compliance with the MBTA and no mitigation is required.

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

Less Than Significant With Mitigation Incorporated. See Impact 3.4(a), above. According to the Arborist Report, 77 trees were found in the study area; it is anticipated that all trees within the study area will either be removed, pruned, or have some ground-disturbing activity within their dripline radius (ECORP 2023). Of the 77 trees in the study area, 10 inventoried trees are considered City Trees because they are located within Kemble Park, and 11 trees are considered Private Protected Trees because they are located within the project site and have a diameter at standard larger than 24 feet. It is anticipated that 73 of the 77 trees within the study area are proposed for removal; and the remaining four trees (tag numbers 8, 12, 13, and 14; see Figure 6, *Arborist Survey Results*) have trunks located on private property and would have indirect impacts. Indirect impacts means that there would be impacts at the soil level within the Tree Protection Zone of the tree through some form of

ground disturbance (ECORP 2023). Of the 73 trees proposed for removal, 21 have a high biological value, 31 have a moderate biological value, and 16 have a low biological value. As such, it is recommended that trees with a high biological value be transplanted and trees with a moderate biological value be transplanted or replaced at a ratio of 2:1 or higher during the dormant season (November to February).

While the City's tree ordinance (Chapter 12.56, Tree Planting, Maintenance, and Conservation, of the City of Sacramento Municipal Code) does not apply to the District's property, it provides standards for protection and replacement of trees on City and private property. As such, the proposed project would include these standards as Mitigation Measure BIO-1 and Mitigation Measure BIO-2 which would reduce potentially significant impacts to the four remaining trees (tag numbers 8, 12, 13, and 14; see Figure 6, *Arborist Survey Results*) to less than significant.

Mitigation Measures

BIO-1 The project shall implement the following development standards for the four remaining trees (tag numbers 8, 12, 13, and 14) during construction activities:

- Avoid grade cuts greater than 1 foot within the driplines of preserved trees and within 5 feet of their trunks.
- Avoid fill greater than 1 foot within the driplines of preserved trees and any placement of fill within 5 feet of their trunks.
- Avoid trenching within the driplines of preserved trees. If it is absolutely necessary to install underground utilities within the driplines of a preserved tree, then the trench shall either be bored or drilled.
- Avoid installing irrigation systems within the driplines of preserved tree(s) as it may be detrimental to the long-term survival of the preserved tree(s).
- Limit landscaping beneath preserved trees be limited to nonplant materials such as boulders, cobbles, wood chips, etc., or plant species tolerant of the natural semi-arid environs of the trees. Drip irrigation shall be limited to approximately twice per summer for the understory plants.

BIO-2 The project shall implement the following development standards for the four remaining trees (tag numbers 8, 12, 13, and 14) during grading activities:

- Major roots 2 inches or greater in diameter or encountered within the tree's dripline in the course of excavation from beneath trees that are not to be removed shall be kept moist and covered with earth as soon as feasible. Roots 1 inch to 2 inches in diameter that are severed shall be trimmed, treated with pruning compound, and covered with earth as soon as possible.

3. Environmental Analysis

- Support roots that are inside the dripline of the tree should be protected to the extent feasible. Hand-digging is recommended in the vicinity of major trees to prevent root cutting and mangling by heavy equipment.

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?

Less Than Significant Impact. The project site is not within a Natural Community Conservation Plan or Habitat Conservation Plan area. The project site does not contain sensitive biological resources given its disturbed nature; the proposed project would be required to comply with Chapter 12.56, Tree Planting, Maintenance, and Conservation, of the City of Sacramento Municipal Code. Impacts would be less than significant.

Figure 6 - Arborist Survey Results

Map Contents

- Cesar E. Chavez Elementary School - 10.06 ac.
- Edward Kemble Park - 1.74 ac.

Tree Species (78)

- Amur Maple (4)
- California Redwood (22)
- California Sycamore (7)
- Callery Pear (1)
- Chinese Elm (5)
- Chinese Privet (2)
- Crepe Myrtle (5)
- DEAD (1)
- Deodar Cedar (1)
- Eucalyptus (1)
- Honey Locust (1)
- Knobcone Pine (3)
- Liquidambar (2)
- Oregon Ash (1)
- Pepper Tree (1)
- Red Oak (1)
- Silver Maple (1)
- Valley Oak (6)
- Velvet Ash (4)
- Willow Oak (5)
- Zelkova (4)

0 100
Scale (Feet)

Source: ECORP Consulting, Inc., 2022.

3. Environmental Analysis

This page intentionally left blank.

3.5 CULTURAL RESOURCES

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?				X
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?		X		
c) Disturb any human remains, including those interred outside of dedicated cemeteries?			X	

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

No Impact. Section 15064.5 defines historic resources as resources listed or determined to be eligible for listing by the State Historical Resources Commission, a local register of historical resources, or the lead agency. Generally a resource is considered "historically significant" if it meets one of the following criteria:

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

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

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

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

The project site contains Kemble Elementary School, which opened in 1963, and Chavez Elementary School, which opened in 2000. There are no state or national historic resources on the project site (NPS 2020; OHP 2022). Construction of the proposed project would occur within the project boundary, with the exception of temporary fencing at Kemble Park. Therefore, no impacts would occur.

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

Less Than Significant Impact with Mitigation Incorporated. Implementation of the proposed project would require ground disturbing activities such as ground clearing, excavation, grading, and other construction activities. Although the project site is already developed and is not within an archaeological sensitive area, as indicated in the Environmental Resources Background Report for the City of Sacramento 2035 General Plan,

potential buried resources could be unearthed during ground disturbing activities (Sacramento 2015a). Mitigation Measure CUL-1 requires that if any evidence of cultural resources is discovered, all work within the vicinity of the find will stop until a qualified archaeological consultant can assess the find and make recommendations. Therefore, impacts to archaeological resources would be reduced to a less than significant impact with mitigation.

Mitigation Measures

CUL-1 Prior to grading activities, a qualified archaeological monitor shall be identified to be on call during ground-disturbing activities. If archeological resources are discovered during excavation and/or construction activities, construction shall stop within 100 feet of the find, and the qualified archaeologist shall be consulted to determine whether the resource requires further study. The archaeologist shall make recommendations to the District to protect the discovered resources.

If the resources are deemed to be non-tribal, the archaeological resources recovered shall be provided to the North Central Information Center and California State University, Sacramento Natural History Museums, or any other local museum or repository willing and able to accept and house the resource to preserve for future scientific study.

If the resources are deemed to be tribal-related, the Wilton Rancheria will be contacted to assess the significance of any find as well, in order to obtain recommendations on how best to proceed. Tribal-related archaeological resources discovered will be left in place in order to minimize handling until consultation with the qualified archaeological monitor and the Wilton Rancheria can be arranged in order to determine the appropriate next steps. Continued work in the area of the archaeological find will only proceed after authorization from the District in coordination with the Wilton Rancheria and the qualified archaeological monitor. The Wilton Rancheria contact information is as follows:

Wilton Rancheria – Cultural Preservation Department
Tel: 916.683.6000
cpd@wiltonrancheria-nsn.gov

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

Less Than Significant Impact. The project site is currently developed and would require grading and other ground disturbing activities. California Health and Safety Code Section 7050.5 requires that if human remains are discovered on a project site, disturbance of the site shall halt until the coroner has conducted an investigation into the circumstances, manner, and cause of death, and has made recommendations concerning their treatment and disposition to the person responsible for the excavation, or to his or her authorized representative. If the coroner determines that the remains are not subject to his or her authority and has reason to believe they area Native American, he or she shall contact the NAHC by telephone within 24 hours. Impacts to human remains would be less than significant.

3.6 ENERGY

Existing Conditions

Pacific Gas & Electric (PG&E) supplies natural gas to much of northern and central California – from Humboldt and Shasta counties in the north to Kern and Santa Barbara counties in the south – including the infrastructure for the City of Sacramento.

Sacramento Municipal Utility District (SMUD) is the nation's 6th largest community-owned, not-for-profit electric utility to provide electricity to most of Sacramento County and small portions of Placer and Yolo Counties (SMUD 2022). SMUD has outlined in their 2030 Clean Energy Vision to commit to a goal of zero carbon emissions in their power supply by 2030. To reach this goal, SMUD is considering ideas such as new technology (e.g., green hydrogen, biofuels, long duration storage), business models that engage customers with their connected devices, and gas-fired power plant replacement to reduce emissions.

The current project site is served by both electricity and natural gas connections. Electricity is supplied to the project site by SMUD. SMUD provides a standard 33.8 percent renewable energy portfolio and a 100 percent renewable option that electricity customers can opt into. Natural gas and associated infrastructure are provided and maintained by PG&E.

Current energy demands are derived from the operation of the two existing elementary schools (Chavez Elementary School and Kemble Elementary School). Energy demand from the existing land uses includes building energy (e.g., electricity used for lighting and natural gas used for heating) and energy demand from vehicle trips.

Would the project:

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

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

Less Than Significant Impact. The following discusses the potential energy demands from construction activities associated with the development of the proposed project and its operation.

3. Environmental Analysis

Short-Term Construction Impacts

Electrical Energy

Construction of the proposed project would not require electricity to power most construction equipment. The electricity used during construction would vary during different phases of construction, where the majority of construction equipment during demolition, site preparation, trenching, and grading would be gas-powered or diesel-powered, and the later construction activities, such as architectural coatings, could require electric-powered equipment. Overall, the use of electricity would be temporary in nature and would fluctuate according to the activity of construction. Additionally, it is anticipated that the majority of electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities. Therefore, as electricity consumption during project construction would be minimal and would occur when necessary to complete construction of the proposed project, project-related construction activities would not result in wasteful or unnecessary electricity demands, and impacts would be less than significant.

Natural Gas Energy

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

Transportation Energy

Transportation energy use depends on the type and number of trips, vehicle miles traveled, fuel efficiency of vehicles, and travel mode. Transportation energy used during construction would come from the transport and use of construction equipment, delivery vehicles, and construction employee vehicles that would use diesel fuel and/or gasoline. The use of energy resources by these vehicles would fluctuate according to the activity of construction and would be temporary. Upon completion of project construction, all construction-equipment would cease. Furthermore, the construction contractors are anticipated to minimize non-essential idling of construction equipment during construction in accordance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9, which limits the nonessential idling of diesel-powered off-road equipment to five minutes. Such required practices would limit wasteful and unnecessary energy consumption.

In general, there are no unusual characteristics that would directly or indirectly cause construction activities to be any less efficient than would occur elsewhere (restrictions on equipment, labor, types of activities, etc.). The proposed utility infrastructure would connect to the existing water, sewer, storm drain system, natural gas and electricity network in the area since the land use intensity will remain the same. Therefore, it is expected that construction energy usage associated with the proposed project would not be any more inefficient, wasteful, or unnecessary than similar projects and impacts would be less than significant with respect to construction-related energy demands.

Long-Term Impacts During Operation

Operation of the proposed project would create higher demands for electricity, natural gas, and would result in new transportation energy use. Operational use of energy would include heating, cooling, and ventilation of

buildings; water heating; operation of electrical systems, use of on-site equipment and appliances; and indoor, outdoor, perimeter, and parking lot lighting.

Electrical Energy

The proposed project involves the redesign and reconstruction of the existing two elementary school to one new elementary school. Electrical service to the proposed project would be provided by SMUD connections to existing off-site electrical lines and new on-site infrastructure. As shown in Table 4, *Electricity Consumption,* implementation of the proposed project would result in an increase of 837,886 kilowatt hours of electricity use per year.

Table 4 Electricity Consumption

Land Use	Electricity (kWh/year)
Proposed Project Conditions[2]	
P1 Temporary Buildings[1]	240,904
P1 Parking Lot	876
P2.1 Elementary School Buildings	528,654
P2.1 Parking Lot	13,140
P2.2 Parking Lot	54,312
Total	837,886
Total At Full Buildout	596,982

Source: CalEEMod Version 2022.1.
Notes:
1. Temporary buildings would only operate for a short time and be removed during P2.2 of construction.
2. P1 includes demolition of the existing building/asphalt and construction of interim housing, P2.1 includes the new building construction and associated site preparation, site work underground utilities and grading, and P2.2 includes demolition of the existing buildings/asphalt and installation of the fields/parking lot.

While the proposed project would result in a higher electricity demand than existing conditions onsite, it would be required to comply with the Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen). New and replacement buildings in compliance with these standards would generally have greater energy efficiency than existing buildings. Furthermore, the proposed project would receive energy through SMUD to provide renewable energy for the All-Electric buildings. Encouraging sustainable and energy-efficient building practices and using more renewable energy strategies will further reduce building-related per capita energy consumption after buildout of the campus and move closer toward achieving zero net energy. Compliance with these codes would decrease overall reliance on fossil fuels and increase reliance on renewable energy sources for electricity generation. Thus, operation of the proposed buildings would not result in wasteful or unnecessary electricity.

Natural Gas

Implementation of the proposed project would not generate an increase natural gas since the campus would encompass only All-Electric buildings onsite as require by SMAQMD's best management practices (BMPs). Furthermore, the new buildings would be consistent with the requirements of the Building Energy Efficiency Standards and would generally result in a decrease in per capita natural gas consumption than existing buildings.

Compliance with these codes would decrease overall reliance on fossil fuels and increase reliance on renewable energy sources for electricity generation. Therefore, operation of the proposed project would result in less than significant impacts with respect to natural gas usage.

Transportation Energy

The proposed project is not anticipated to increase student or adult staff capacity for the schools, and thus implementation of the proposed project would not generate additional vehicle fuel usage compared to existing conditions. Based on the traffic study, the proposed project would result in an improvement to the access and circulation system near the campus. A new parking lot and drop-off/pick-up area would be provided for the transitional kindergarten/kindergarten component of the school to separate the transitional kindergarten/kindergarten maneuvers and bus activity from the general school traffic. Making the flow of traffic more efficient would decrease transportation-related energy by increasing drop-off/pick-up zones near campus and reduce the excessive idling that now occurs.

Additionally, fuel efficiency of vehicles during the buildout year of 2025 would on average improve compared to vehicle fuel efficiencies experienced under existing conditions, thereby resulting in a lower per capita fuel consumption in 2025 assuming travel distances, travel modes, and trip rates remain the same. The improvement in fuel efficiency would be attributable to the statewide fuel reduction strategies and regulatory compliances (e.g., CAFE standards), resulting in new cars that are more fuel efficient and the attrition of older, less fuel-efficient vehicles. The CAFE standards are not directly applicable to land use development projects, but to car manufacturers. Thus, the District students and staff do not have direct control in determining the fuel efficiency of vehicles manufactured and that are made available. However, compliance with the CAFE standards by car manufacturers would ensure that vehicles produced in future years have greater fuel efficiency and would generally result in an overall benefit of reducing fuel usage by providing the population of the project site's region more fuel-efficient vehicle options.

Moreover, as discussed in greater detail under Section 3.8, *Greenhouse Gas Emissions*, the proposed project would be required to implement Mitigation Measure GHG-1, which involves the installation of electric vehicle (EV) capable and EV charging spaces consistent with the most current California Green Building Standards Code (CALGreen) Tier 2 nonresidential measures for EV capable and EV charging spaces, and would increase reliance on electricity for transportation energy demand. As electricity consumed in California is required to meet the increasing renewable energy mix requirements under the State's RPS and accelerated by SB 100, greater and greater proportions of electricity consumed for transportation energy demand envisioned under the proposed project would continue to be sourced from renewable energy sources rather than fossil fuels. Since vehicle fuel efficiencies would improve year over year through the buildout year of 2025 and result in a decrease in overall per capita transportation energy consumption, impacts would be less than significant with respect to operation-related fuel usage.

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

No Impact. The State's electricity grid is transitioning to renewable energy under California's Renewable Energy Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. Electricity production from renewable sources is generally considered carbon neutral. Executive

Order S-14-08, signed in November 2008, expanded the state's renewable portfolios standard (RPS) to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Senate Bill 350 (de Leon) was signed into law September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. Senate Bill 350 also set a new goal to double the energy-efficiency savings in electricity and natural gas through energy efficiency and conservation measures. On September 10, 2018, Senate Bill 100 (SB 100) was signed and raised California's RPS requirements to 60 percent by 2030, with interim targets, and 100 percent by 2045. The bill also established a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

The statewide RPS goal is not directly applicable to individual development projects, but to utilities and energy providers such as SMUD, which is the utility that would provide all of electricity needs for the proposed project. Compliance of SMUD in meeting the RPS goals would ensure the State in meeting its objective in transitioning to renewable energy, especially since SMUD has an ambitious goal of reaching zero carbon emissions in their power supply by 2030 (SMUD 2023). Furthermore, implementation of the proposed project would encompass only All-Electric buildings onsite as required by SMAQMD's BMP, which would generally have greater energy efficiency than existing buildings and must comply with the latest Building Energy Efficiency Standards and CALGreen.

Therefore, implementation of the proposed project would not conflict or obstruct plans for renewable energy or energy efficiency, and impacts would be less than significant.

3.7 GEOLOGY AND SOILS

Would the project:

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

3. Environmental Analysis

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

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

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

Less Than Significant Impact. The project site is not in an Alquist-Priolo Earthquake Fault Zone and no fault lines traverse the site (CDC 2022b; CDC 2022c). Therefore, impacts would be less than significant.

ii) Strong seismic ground shaking?

Less Than Significant Impact. As stated in 3.7.a.i, above, the project site is not on a known fault zone or within an earthquake fault zone. The nearest active fault to the project site is the Dunnigan Hills Fault located approximately 26.4 miles northwest of the site. The site is not on a pressure ridge, and there are no known active faults on or immediately adjacent to the site. Therefore, impacts would be less than significant.

iii) Seismic-related ground failure, including liquefaction?

Less Than Significant Impact. Liquefaction refers to loose, saturated sand, or gravel deposits that lose their load-supporting capability when subjected to intense shaking. Liquefaction potential varies based upon three main contributing factors: 1) cohesionless, granular soils having relatively low densities (usually of Holocene age); 2) shallow groundwater (generally less than 50 feet); and 3) moderate to high seismic ground shaking. According to the Sacramento County Local Hazard Management Plan, the Delta and areas of downtown Sacramento are at risk of liquefaction; however, there have been no past events of liquefaction that affected the City (Sacramento County 2021). The South Area Community Plan area has some liquefaction potential. Since the proposed project is a school rebuild, CGS and DSA would ensure

that the buildings are sufficiently evaluated for liquefaction potential. Additionally, all structures would be built to adhere to the 2022 California Building Code (CBC), or the most recent version, which provides minimum standards to protect property and public welfare by regulating design and construction to reduce the effects of adverse soil conditions. Therefore, impacts would be less than significant.

iv) Landslides?

Less Than Significant Impact. Landsliding is a type of erosion in which masses of earth and rock move downslope as a single unit. No landslides have been mapped on the site (CDC 2022d). The project site is relatively flat. Furthermore, all structures on the site would comply with the 2022 CBC, or most recent version, as well as the DSA criteria, which provides minimum standards to protect property and public welfare by regulating design and construction to reduce the effects of adverse soil conditions.

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

Less Than Significant Impact. Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved, and removed from one place and transported to another. The project site is an existing school site with paved and impervious surfaces (parking lot, buildings, hardcourts) as well as pervious surfaces (turf field, vegetation). The project site would implement structural and nonstructural best management practices before and during construction to control surface runoff and erosion to retain sediment on the project site. Once the proposed project is constructed, soil erosion would be controlled with improvements installed on the project site. Therefore, a less than significant impact would occur.

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. As discussed in 3.7.a.iii and iv, the project site is not in a liquefaction or landslide zone. Lateral spreading is a phenomenon where large blocks of intact, non-liquefied soil move downslope on a large, liquefied substratum; the mass moves toward an unconfined area, such as a descending slope or stream-cut bluff and has been known to move on slope gradients as little as one degree. The topography of the site is relatively flat, and therefore, impacts from lateral spreading would be less than significant.

Subsidence of basins attributed to overdraft of groundwater aquifers or over pumping of petroleum reserves has been reported in various parts of California. Collapsible soils may appear strong and stable in their natural (dry) state, but they rapidly consolidate under wetting, generating large and often unexpected settlements. Seismically induced settlement consists of dynamic settlement of unsaturated soil (above groundwater) and liquefaction-induced settlement (below groundwater). These settlements occur primarily in low-density sandy soil due to the reduction in volume during and shortly after an earthquake. The proposed project would not require the withdrawal of groundwater from the site, and is not within areas of land subsidence according to USGS (USGS 2022). Impacts to subsidence would be less than significant.

The proposed project would be required to comply with CBC and DSA criteria which would ensure adequate design and construction of building foundations to resist soil movement. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. Expansive soils swell when they become wet and shrink when they dry out resulting in the potential for cracked building foundations. The South Area Community Plan area has some expansive soil; the clay in particular, on the northern portion of the site, has a high likelihood of being expansive. All structures built onsite would adhere to the 2022 CBC, or most recent version. Additionally, since the site would be part of a school site, the California Geological Survey and Division of the State Architect would ensure that all potential impacts to the buildings would be sufficiently reduced. Therefore, the project site would not have less than significant impacts on exposing people or the proposed structures to adverse effects associated with expansive soils.

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

No Impact. The proposed project would not require the installation of a septic tank or alternative wastewater disposal system but would not utilize the local sewer system. Therefore, no impacts would result from soil conditions in relation to septic tanks or other on-site water disposal systems.

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

Less Than Significant Impact With Mitigation Incorporated. The project site is currently developed. The proposed project would require limited grading and other ground disturbing construction activities to accommodate the construction of the proposed project and utility requirements. Due to the ground disturbance associated with construction, there is potential that natural landform beneath the site would be encountered during construction and that subsurface resources and/or paleontological resources would be discovered. Implementation of Mitigation Measure GEO-1 would ensure that if resources are discovered during ground disturbing activities that resources would be recovered in accordance with state and federal requirements. Implementation of Mitigation Measure GEO-1 would reduce impacts to paleontological resources to a less than significant level.

Mitigation Measures

GEO-1 Prior to construction, the District shall identify a qualified paleontologist to be on-call. If unique paleontological resources are discovered during excavation and/or construction activities, construction shall stop within 50 feet of the find, and the qualified paleontologist shall be consulted to determine whether the resource requires further study. The paleontologist shall make recommendations to the District to protect the discovered resources. Any paleontological resources recovered shall be provided to the North Central Information

Center and California State University, Sacramento Natural History Museums, or repository willing and able to accept and house the resource to preserve for future scientific study.

3.8 GREENHOUSE GAS EMISSIONS

The analysis in this section is based in part on the following:

- *Air Quality and Greenhouse Gas Emissions Analysis,* PlaceWorks, January 2023

A complete copy of the report is included in Appendix A to this Initial Study.

Existing Conditions

The existing two elementary schools generate GHG emissions from transportation sources, energy (natural gas and purchased energy), and area sources such as landscaping equipment.

Discussion

Scientists have concluded that human activities are contributing to global climate change by adding large amounts of heat-trapping gases, known as greenhouse gases (GHGs), into the atmosphere. The primary source of these GHG is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHG—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N_2O), sulfur hexafluoride (SF_6), hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons.[2]

Information on manufacture of cement, steel, and other "life cycle" emissions that would occur as a result of the project are not applicable and are not included in the analysis. Black carbon emissions are not included in the GHG analysis because the California Air Resources Board (CARB) does not include this pollutant in the state's Assembly Bill (AB) 32 inventory and treats this short-lived climate pollutant separately. A background discussion on the GHG regulatory setting and GHG modeling can be found in Appendix A to this Initial Study.

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		**X**		

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

3. Environmental Analysis

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X	

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

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

Project-related construction GHG emissions are shown in Table 5, *Project-Related Construction GHG Emissions*. Implementation of the proposed project would result in the reconstruction and consolidation of the two existing elementary schools. Since proposed elementary school buildings square footage would be less than existing conditions, there would be a net decrease in area sources (e.g., consumer cleaning products) and energy usage (i.e., natural gas and electricity), and the proposed project would result in a decrease in student capacity. Therefore, the proposed project would not increase mobile emissions, water demand, wastewater, and solid waste generation. Since there would be reduced building square footage, a decrease in student capacity, and the new buildings would be designed to be All-Electric and more energy efficient in comparison to the existing structures, the proposed project would result in a net reduction in operational GHG emissions from existing conditions.

The SMAQMD has adopted a GHG significance threshold for GHG emissions from construction and operation of a project, which is 1,100 $MTCO_2e$ per year with implementation of best management practices (BMPs) for GHG emissions. SMAQMD's two BMPs include: (1) require all buildings to use all electric energy systems, and (2) include parking stalls with electric vehicle (EV) capable spaces consistent with the requirements of the most current California Green Building Standards Code (CALGreen) Tier 2 nonresidential measures for EV capable and EV charging spaces.

Without these BMPs, the proposed project would have the potential to have significant impacts on the environment. The SMAQMD has developed this threshold to ensure that new GHG emissions would be reviewed and assessed for mitigation, thereby contributing to GHG emissions reduction goals of AB 32, SB 32, the Scoping Plan, and Executive Order B-30-15 (SMAQMD 2021).

Annual average construction emissions for each phase were amortized over 30 years. As shown in Table 5, development and construction of the proposed project would not generate a net increase in annual emissions that would exceed the SMAQMD threshold of 1,100 metric tons of carbon dioxide equivalent ($MTCO_2e$) per year. In terms of operation, the proposed project, by design, would satisfy the first BMP of all electric energy

systems, but would not be designed to implement the second required BMP of including EV charging infrastructure consistent with the current CALGreen Tier 2 nonresidential standards. Therefore, operational GHG emissions associated with the proposed project may result in cumulative contribution to GHG emissions. Impacts would be potentially significant; therefore, Mitigation Measure GHG-1 is required.

Table 5 Project-Related Construction GHG Emissions

Source	GHG Emissions
	$MTCO_2e$ Per Year
Construction[2]	
Phase 1	
Year 2023	46
30-Year Amortized Construction[1]	2
Phase 2.1	
Year 2023	186
Year 2024	364
Year 2025	165
30-Year Amortized Construction[1]	24
Phase 2.2	
Year 2025	82
30-Year Amortized Construction[1]	3
SMAQMD GHG Threshold	**1,100 $MTCO_2e$/Yr**
Exceeds Threshold?	**No**

Source: CalEEMod, Version 2022.1., SMAQMD 2020a

Notes: MTons = metric tons; $MTCO_2e$ = metric ton of carbon dioxide equivalent

[1] Total construction emission are amortized over 30 years per SMAQMD methodology.

[2] P1 includes demolition of the existing building/asphalt and construction of interim housing, P2.1 includes the new building construction and associated site preparation, site work underground utilities and grading, and P2.2 includes demolition of the existing buildings/asphalt and installation of the fields/parking lot.

Mitigation Measures

GHG-1 The project shall comply with the 2019 California Green Building Standards Code (CALGreen) Tier 2 standards which are a requirement under the Sacramento Metropolitan Air Quality Management District (SMAQMD) Greenhouse Gas (GHG) Best Management Practices (BMPs). Plans shall identify the number of EV parking spaces with chargers that meet the 2019 CALGreen Tier 2 standards.

With implementation of Mitigation Measure GHG-1, the proposed project would be required to install the applicable number of EV charging spaces per CALGreen Tier 2 requirements for projects subject to SMAQMD's GHG BMPs. Therefore, the proposed project would implement both of the required BMPs identified in the SMAQMD CEQA Guide, by design and through the incorporation of Mitigation Measure GHG-1, and impacts would be less than significant with mitigation incorporated (SMAQMD 2020a).

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

Less Than Significant Impact. Applicable plans adopted for the purpose of reducing GHG emissions include CARB's Scoping Plan and the County's Climate Action Plan. A consistency analysis with these plans is presented below.

California Air Resources Board Scoping Plan

CARB's Scoping Plan is California's GHG reduction strategy to achieve the state's GHG emissions reduction target established by SB 32, which is to reduce GHG emissions to 40 percent below 1990 emission levels by year 2030. CARB recently adopted the 2022 Scoping Plan to achieve the state's carbon neutrality goals under EO B-55-18. The CARB Scoping Plan is applicable to state agencies and is not directly applicable to cities/counties or individual projects (i.e., the Scoping Plan does not require the school district to adopt policies, programs, or regulations to reduce GHG emissions). However, new regulations adopted by the state agencies outlined in the Scoping Plan result in GHG emissions reductions at the local level. As a result, local jurisdictions benefit from reductions in transportation emissions rates, increases in water efficiency in the building and landscape codes, and other statewide actions that affect a local jurisdiction's emissions inventory from the top down. Statewide strategies to reduce GHG emissions include the LCFS and changes in the corporate average fuel economy standards (e.g., Pavley I and Pavley California Advanced Clean Cars program).

Reconstruction of the proposed project would adhere to the programs and regulations identified by the Scoping Plan and implemented by state, regional, and local agencies to achieve the statewide GHG reduction goals of AB 32, SB 32, and AB 1279. In addition, both of the required BMPs go beyond the requirements of the current CALGreen and Building Energy Efficiency Standards in effect at the time of construction. The proposed project would also not increase student capacity and thus would not increase vehicle miles traveled (VMT). Therefore, the proposed project would be consistent with State efforts to reduce motor vehicle emissions and generate GHG emissions consistent with the reduction goals of AB 32, SB 32, and AB 1279. The proposed project would not obstruct implementation of the CARB Scoping Plan, and a less than significant impact would occur.

2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS)

SACOG adopted the 2020 MTP/SCS in November 2019, which lays out the transportation investment and land use strategy to support an economically prosperous region (SACOG 2019). The 2020 MTP/SCS provides a general idea of future land use patterns to meet the housing needs of the region and outlines transportation planning that reduces GHG emissions from vehicles consistent with state climate goals. The overarching strategy in the 2020 MTP/SCS is to foster a balance of new housing and job growth near job centers with mobility options to reduce the growth rate of vehicle miles traveled. Additionally, this plan emphasizes more frequent transit services and to build an efficient multimodal system (including bike or car share, ride-hailing options, bus, and light rail) to provide more travel choices to residents throughout the region. The projected regional development, when integrated with the proposed regional transportation network in the 2020 MTP/SCS, would reduce per-capita GHG emissions related to vehicular travel and achieve the 19 percent GHG reduction per-capita target for the SACOG region.

The 2020 MTP/SCS does not require that local general plans, specific plans, or zoning be consistent with the SCS, but does provide incentives for consistency to governments and developers. The proposed project would result in reconstruction of a new elementary school with newer, more efficient buildings that would serve the surrounding residential area. As discussed in Section 3.14, *Population and Housing*, the new students that would fill the new classrooms would be existing residents living within the District's service boundary, and the proposed project would not directly increase population growth in the area. Therefore, the proposed project would not interfere with SACOG's ability to implement the regional strategies in the 2020 MTP/SCS, and a less than significant impact would occur.

3.9 HAZARDS AND HAZARDOUS MATERIALS

Would the project:

3. Environmental Analysis

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

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

Less Than Significant Impact. Project construction would require small amounts of hazardous materials, including fuels, greases and other lubricants, and coatings such as paint. The handling, use, transport, and disposal of hazardous materials by the construction phase of the project would comply with existing regulations of several agencies–the EPA, Occupational Safety and Health Administration (OSHA), California Division of Occupational Safety and Health (Cal/OSHA), and the US Department of Transportation (DOT). The proposed project would operate as an elementary school. A Pacific Gas and Electric natural gas pipeline is present approximately 1,000 feet north of the project site and a Sacramento Municipal Utilities District natural gas pipeline is located approximately 1,030 feet northeast of the project site. A Pipeline Safety Hazard Assessment (PSHA) is being prepared to ensure the project meets applicable safety standards. The PSHA will be submitted to CDE for review and approval.

The project site is located within 1,500 feet of a railroad track easement. The dual light rail tracks located closest to the site followed by a railroad track within the easement. A Rail Safety Study is being conducted to address

these rail tracks. The study must affirm safety standards are met for the project to proceed. The study will be submitted to CDE for review and approval.

Project maintenance may require the use of cleaners, solvents, pesticides, and other custodial products that are potentially hazardous. These materials would be used in relatively small quantities, clearly labeled, and stored in compliance with state and federal requirements. With the exercise of normal safety practices, the project would not create substantial hazards to the public or the environment. Therefore, a less than significant impact would occur.

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. Construction projects typically maintain supplies onsite for containing and cleaning small spills of hazardous materials. However, construction activities would not involve a significant amount of hazardous materials, and their use would be temporary. Furthermore, project construction workers would be trained on the proper use, storage, and disposal of hazardous materials. Operation of the site would continue as existing conditions and would not warrant use of hazardous materials in quantities that could result in conditions.

The proposed project would be required to be constructed in accordance with the Storm Water Pollution Prevention Plan (SWPPP) which includes best management practices (BMPs) to reduce or eliminate pollutants in stormwater discharges. BMPs for hazardous materials may include, but are not limited to, off-site refueling, placement of generators on impervious surfaces, establishing cleanout areas for cement, etc. While the risk of exposure to hazardous materials cannot be eliminated, adherence to existing regulations would ensure compliance with safety standards related to the use and storage of hazardous materials and with the safety procedures mandated by applicable federal, state, and local laws and regulations.

There is a Pacific Gas and Electric natural gas pipeline approximately 1,000 feet north of the project site and a Sacramento Municipal Utilities District natural gas pipeline approximately 1,030 feet northeast of the project site. A Pipeline Safety Hazard Assessment (PSHA) is being prepared to confirm the site meets all the safety standards. The PSHA will be submitted to CDE for review.

Based on a review of historical aerial photographs, the site was utilized for agricultural purposes (grass crops) from at least 1937 to about 1957. Based on the site history, the District will perform a Preliminary Environmental Assessment (PEA) to evaluate the potential for residual pesticides and metals to be in shallow soil and submit the PEA to DTSC for review. The District will comply with the requirements of the DTSC during the PEA process in accordance with a forthcoming Environmental Oversight Agreement between the District and DTSC.

Compliance with these regulations would ensure that risks resulting from the routine transportation, use, storage, or disposal of hazardous materials or hazardous wastes associated with the proposed project and the potential for accident or upset is 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?

No Impact. There are no schools located within 0.25-mile of the project site. Furthermore, the project site would operate as an elementary school and would not emit hazardous emissions or handle hazardous materials or substances. Therefore, no impact would occur.

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?

Less Than Significant Impact. The project site is not listed on GeoTracker but is listed on EnviroStor as the site was part of a 10-acre existing elementary school, and the parcel was covered with grass and surrounded by a chain link (DTSC 2022; SWRCB 2022). EnviroStor noted that the construction of the addition to the school was nearing completion when a site visit (May 11, 2001) was conducted. The cleanup status for Kemble Elementary School was "No Action Required" as of June 13, 2001. Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The project site is 1.6 miles southeast of the Sacramento Executive Airport. As with the existing conditions, the proposed project would operate as an educational institution and no changes to the uses onsite would occur. As such, the students and staff at the project site would not be exposed to safety hazards or noise in excess to what they are exposed to under existing conditions. The project site is not within a safety zone (SACOG 1999). Therefore, impacts would be less than significant.

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

Less Than Significant Impact. The proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project site and surrounding properties during construction and operation. Both the City Fire Marshal and DSA would be required to approve fire access around the site. As part of the DSA process, a Fire and Life Safety Review would be conducted when DSA would review building construction and how occupants can safely exit the buildings in case of a fire. The proposed project would not result in inadequate emergency access, and impacts would be less than significant.

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

Less Than Significant Impact. The project site is not located in a very high fire hazard severity zone (VHFHSZ) (CAL FIRE 2022). The project site is located in an urbanized portion of the City. The proposed

project would be required to comply with the 2022 CBC and 2022 California Fire Code (CFC). Therefore, impacts would be less than significant.

3.10 HYDROLOGY AND WATER QUALITY

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
X. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?			X	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?			X	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in a substantial erosion or siltation on- or off-site;			X	
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;			X	
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			X	
iv) impede or redirect flood flows?			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	

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

Less Than Significant Impact. The project site is within the jurisdiction of the Central Valley Regional Water Quality Control Board (RWQCB). Drainage and surface water discharges during construction and operation of the proposed project would not violate any water quality standards or waste discharge requirements. However, site preparation and other soil-disturbing activities during construction of the project could temporarily increase the amount of soil erosion and siltation entering the local stormwater drainage system.

The proposed project would disturb approximately 8.71 acres. Pursuant to Section 402 of the Clean Water Act, the US Environmental Protection Agency has established regulations under the National Pollution Discharge

Elimination System (NPDES) program to control direct stormwater discharges. In California, the State Water Resources Control Board administers the NPDES permitting program and is responsible for developing permitting requirements. The NPDES program regulates industrial pollutant discharges, including construction activities for sites larger than one acre. Since implementation of the proposed project would disturb more than one acre, the proposed project would be subject to the NPDES Construction General Permit requirements (Order No. 2009-0009-DWQ).

Construction

Clearing, grading, excavation, and construction activities associated with the project have the potential to impact water quality through soil erosion and increasing the amount of silt and debris carried in runoff. Additionally, the use of construction materials such as fuels, solvents, and paints may present a risk to surface water quality. To minimize these potential impacts, the proposed project would be required to comply with the NPDES Construction General Permit as well as the best management practices (BMPs) to control erosion and prevent any discharge of sediments from the site to reduce potential impacts to less than significant levels.

Operation

For site operations, structural BMPs, such as landscaping, would reduce runoff. Therefore, a less than significant impact to water quality standards would occur.

The proposed project would also be required to comply with applicable federal, state, and local regulations. Provided that the standard BMPs are implemented, the proposed project would not substantially degrade water quality. A less than significant impact would occur.

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

Less Than Significant Impact. The proposed project does not propose groundwater wells that would extract groundwater from an aquifer, nor would the proposed project affect recharge capabilities for the basin, as there are no wetlands onsite. Therefore, a less than significant would occur.

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

i) Result in a substantial erosion or siltation on- or off-site?

Less Than Significant Impact. The proposed project would not alter the course of a stream or river. Construction of the project would increase the potential for erosion and siltation. However, the proposed project would include BMPs such as landscaping, which would reduce runoff, and improvements would be constructed over a short period of time. Therefore, a less than significant impact would occur.

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

Less Than Significant Impact. The proposed project would not alter the course of a stream. Project implementation would include pervious and impervious surfaces on site. With the use of BMPs and compliance with local, state, and federal regulations, to ensure that drainage patterns and stormwater runoff are maintained, impacts would be less than significant.

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

Less Than Significant Impact. Project implementation would include pervious and impervious surfaces on site. With the proposed BMPs, impacts associated with impervious surfaces would be reduced. The proposed project would be required to comply with local, state, and federal regulations pertaining to stormwater. Therefore, the proposed project would not exceed the capacity of existing or planned stormwater drainage systems. Impacts would be less than significant.

iv) Impede or redirect flood flows?

Less Than Significant Impact. The project site is developed with an existing school and is within Zone X, Area with Reduced Flood Risk Due to Levee (Flood Insurance Rate Map ID #06067C0305H) (FEMA 2012). Since the likelihood of floods in the project area is low, the proposed project would have a less than significant impact on impeding or redirecting flood flows.

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

Less Than Significant Impact. A seiche is a surface wave created when a body of water is shaken, usually by earthquake activity. Seiches are of concern relative to water storage facilities because inundation from a seiche can occur if the wave overflows a containment wall, such as the wall of a reservoir, water storage tank, dam or other artificial body of water. Although there are no large water tanks in the area that could impact the proposed project site, there are dams in the region that could create flooding impacts. Thirteen dams in the greater Los Angeles area moved or cracked during the 1994 Northridge earthquake. However, none were severely damaged. This low damage level was due in part to completion of the retrofitting of dams and reservoirs pursuant to the 1972 State Dam Safety Act. According to the Department of Water Resources' California Dam Breach Inundation Maps, the project site is not within the inundation zone of any dams or reservoirs (DWR 2022). The nearest dam to the project site is the Nimbus Dam, approximately 17 miles northeast of the project site. Given the distance and varying topography, impacts of seiche affecting the project site is less than significant.

A tsunami is earthquake-induced flooding that is created from a large displacement of the ocean floor. The site is over 80 miles east of the Pacific Ocean; therefore, the likelihood of a tsunami impacting the project site is not likely. No impact would occur.

A mudflow is a landslide event in which debris, land mass, and soils are saturated during their displacement. The project site is relatively flat, with no slopes near the site that are capable of generating a mudflow. No mudflow impacts would occur.

3. Environmental Analysis

Provided that standard BMPs are implemented, the proposed project would not substantially degrade water quality. As impacts related to the occurrence of site inundation by seiche, tsunami, or mudflow are less than significant, the release of pollutants would be 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 proposed project would not obstruct or conflict with the implementation of a water quality control plan or sustainable water management plan. The proposed project would comply with the water quality and use requirements of these plans through the implementation of BMPs. Therefore, impacts would be less than significant.

3.11 LAND USE AND PLANNING

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. LAND USE AND PLANNING. Would the project:				
a) Physically divide an established community?				X
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?			X	

a) Physically divide an established community?

No Impact. The project site is surrounded by residential uses and Kemble Park. The proposed project consists of rebuilding school buildings within the project site boundaries and installing a temporary fence at Kemble Park during construction activities. Therefore, the proposed project would not divide an established community and no impact would occur.

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

Less Than Significant Impact. The project site is currently zoned R-1 and the existing land use designation is Public/Quasi-Public. Implementation of the proposed project would not change the zoning or land use designations of the site. The proposed project would not change the uses on site, and impacts would be less than significant.

3.12 MINERAL RESOURCES

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?				X
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				X

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

No Impact. There are four mineral resources zones (MRZ):

- **MRZ-1.** Adequate information indicates that no significant mineral deposits are present or likely to be present.
- **MRZ-2.** Adequate information indicates that significant mineral deposits are present or there is a high likelihood for their presence, and development should be controlled.
- **MRZ-3.** The significance of mineral deposits cannot be determined form the available data.
- **MRZ-4.** There is insufficient data to assign any other MRZ designation.

The project site is in MRZ-3, where the known or inferred mineral occurrences of undetermined mineral resource significance exists (CDC 2022e). The project site and its surroundings areas are not developed for mineral extractions. The areas surrounding the project site are developed with buildings, and therefore, no loss of known resources would result from project implementation. No impact would occur.

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. The policies in the City of Sacramento Environmental Resources Element indicate that mineral resource extractions occur in the MRZ-2 zones of the City. The project site currently operates as a school and no mining activities occur onsite. Therefore, the proposed project would not result in a loss of availability of a mining site, and no impact would occur.

3.13 NOISE

The analysis in this section is based in part on the following:

- *Noise Analysis,* PlaceWorks, January 2023

A complete copy of the report is included in Appendix C to this Initial Study.

Noise Fundamentals

Noise is defined as unwanted sound and is known to have several adverse effects on people, including hearing loss, speech and sleep interference, physiological responses, and annoyance. Based on these known adverse effects of noise, both the state, and city governments have established criteria to protect public health and safety and to prevent the disruption of certain human activities, such as classroom instruction, communication, or sleep. Additional information on noise and vibration fundamentals and applicable regulations are contained in Appendix C.

Environmental Setting

Existing Noise Environment

Located to the east and west of the project site is State Route 99 Freeway (1.5 miles) and Interstate 5 (2 miles), respectively.

The proposed project is an existing school consisting of two elementary schools, (Chavez Elementary and Kemble Elementary). The project site is in a predominantly residential area with a noise environment influenced primarily by transportation noise from local roadways, State Route 99 approximately 1.5 miles to the east, Interstate 5 approximately 5 miles to the west, and rail noise from of the project site. Noise from nearby residential uses (e.g., property maintenance and parking lot noise) also contribute to the total noise environment intermittently in the project vicinity as well as flights from the Sacramento Executive Airport approximately 1.5 miles northwest.

The City of Sacramento General Plan's Noise Element includes future noise contours to assess the noise and land use compatibility of a project site. According to the future noise contour table, the project site is within the 65 to 60 dBA CNEL contour for roadway noise from the State Route 99 Freeway, which is considered "normally acceptable" per the City's community noise and land use standards for schools (Sacramento 2015b).

Based on available Federal Rail Association (FRA) data, the railroad easement that is approximately 1,080 feet east of the project site is owned and operated by the Sacramento County Regional Transit District (SCRT). They operate light rail trains (powered electrically by overhead catenary wires) on two of the four tracks. According to the latest schedule, there are 25 southbound and 25 northbound trains traveling along these tracks during school hours (9:00 AM to 3:00 PM). The speed limit in the vicinity of the school site is 40 mph.

There also are two tracks on which Union Pacific (UP) freight trains operate in the same easement. The tracks are part of the Sacramento Subdivision. Freight traffic along these lines have decreased significantly, with 3 freight trains passing by the vicinity of the school during daytime hours.

Existing rail noise was evaluated using the FRA Transit Noise Assessment Model. It was assumed that there would be 50 light rail trains per day and 3 freight trains per day passing by the school site during school hours. Modeling results indicate a noise level of 41 dBA Ldn/CNEL which is considered "normally acceptable" per the City's community noise and land use standards for schools. In terms of rail horn noise, all crossings in the vicinity of the school site are designated as Quiet Zones so there would be no locomotive horn blowing at these intersections. Because this is a modernization project, the noise from the trains east of the existing school site would not be exacerbating existing conditions.

Sensitive Receptors

Certain land uses are particularly sensitive to noise and vibration. These uses include residences, schools, hospital facilities, houses of worship, and open space/recreation areas where quiet environments are necessary for the enjoyment, public health, and safety of the community. Sensitive receptors surrounding the project site are adjacent residences to the southwest and residences approximately 60 feet from the edge of the project site

to the north, east, and west. In addition, Edward Kemble Park is directly adjacent to the south and Hampton Park is approximately 315 feet to east of the project site

Applicable Standards

State Noise Regulations

Title 5, Section 14040(q) California Department of Education

Under Title 5, the California Department of Education (CDE) regulations require the school district to consider noise in the site selection process. As recommended by CDE guidance, if a school district is considering a potential school site near a freeway or other source of noise, it should hire an acoustical engineer to determine the level of sound that the site is exposed to and to assist in designing the school should that site be chosen.

California Building Code

The State of California regulates freeway noise, sets standards for sound transmission, provides occupational noise control criteria, identifies noise standards, and provides guidance for local land use compatibility. State law requires that each county and city adopt a general plan that includes a noise element which is to be prepared according to guidelines adopted by the Governor's Office of Planning and Research. The purpose of the noise element is to "limit the exposure of the community to excessive noise levels."

The California Green Building Standards Code (CALGreen) has requirements for insulation that affect exterior-interior noise transmission for nonresidential structures. Pursuant to CALGreen Section 5.507.4.1, Exterior Noise Transmission, an architectural acoustics study may be required when a project site is within a 65 dBA CNEL or L_{dn} noise contour of an airport, freeway or expressway, railroad, industrial source or fixed-guideway source. Where noise contours are not readily available, if buildings are exposed to a noise level of 65 dBA L_{eq} during any hour of operation, specific wall and ceiling assembly and sound-rated windows may be necessary to reduce interior noise to acceptable levels.

City of Sacramento General Plan Noise Standards

Exterior Noise Standards

The City has developed policies related to noise and land use compatibly based on Federal and State exterior noise abatement criteria. The proposed project is a redevelopment of an existing school, and The City of Sacramento General Plan finds an exterior noise level of 70 dBA CNEL to be acceptable for schools and churches, and 60 dBA CNEL to be normally acceptable for single-family residential as shown in table EC-1 in the general plan.

EC 3.1.2 Exterior Incremental Noise Standards. The City shall require noise mitigation for all development that increases existing noise levels by more than the allowable increment shown in Table 6, *City of Sacramento Existing Exterior Noise Standards Allowable Increase,* to the extent feasible.

Table 6 City of Sacramento Existing Exterior Noise Standards Allowable Increase

Residence and Buildings where People Normally Sleep[a]		Institutional Land Uses with Primarily Daytime and Evening Uses[b]	
Existing L_{dn}	Allowable Noise Increment	Existing Peak Hour Leq	Allowable Noise Increment
45	8	45	12
50	5	50	9
55	3	55	6
60	2	60	5
65	1	65	3
70	1	70	3
75	0	75	1
80	0	80	0

Source: City of Sacramento General Plan 2030, Table EC-2, Exterior Incremental Noise Impact Standards for Noise-Sensitive Uses (dBA)
Notes:
[a] This category includes homes, hospitals, and hotels where a nighttime sensitivity to noise is assumed to be of utmost importance.
[b] This category includes schools, libraries, theaters, and churches where it is important to avoid interference with such activities as speech, meditation, and concentration on reading material.

EC 3.1.5 Interior Vibration Standards. The City shall require construction projects anticipated to generate a significant amount of vibration to ensure acceptable interior vibration levels at nearby residential and commercial uses based on the current City or Federal Transit Administration (FTA) criteria.

EC 3.1.10 Construction Noise. The City shall require development projects subject to discretionary approval to assess potential construction noise impacts on nearby sensitive uses and to minimize impacts on these uses, to the extent feasible.

City of Sacramento Noise Municipal Code

Exterior Noise Standards

The Sacramento Municipal Code includes noise regulations in Title 8 – Health and Safety, Chapter 8.68 – Noise Control (referred to generally as the Noise Ordinance). Of the regulations in Chapter 8.68, not all are applicable to the Proposed Project. The following regulations would apply to the Proposed Project:

Section 8.68.060 sets standards for cumulative exterior noise levels at residential and agricultural properties, including exterior noise standards of 55 dBA from 7:00 a.m. to 10:00 p.m., and 50 dBA from 10:00 p.m. to 7:00 a.m. Per Section 8.68.060(b), the allowable decibel increase above the exterior noise standards in any one hour are:

- 0 dBA for cumulative period of 30 minutes per hour (L_{50});
- 5 dBA for cumulative period of 15 minutes per hour(L_{25});
- 10 dBA for cumulative period of 5 minutes per hour(L_8);
- 15 dBA for cumulative period of 1 minutes per hour(L_2);
- 20 dBA not to be exceeded for any time per hour(L_{max}).

3. Environmental Analysis

In addition, per Section 8.68.060(c), each of the noise limits above shall be reduced by 5 dBA for impulsive or simple tone noises, or for noises consisting of speech or music. If the ambient noise level exceeds that permitted by any of the first four noise limit categories specified in subsection (b) above, the allowable noise limit shall be increased in five dBA increments in each category to encompass the ambient noise level. If the ambient noise level exceeds the fifth noise level category, the maximum ambient noise level shall be the noise limit for that category.

Exemptions

Section 8.68.080 exempts certain activities from Chapter 8.68, including "noise sources due to the erection (including excavation), demolition, alteration or repair of any building or structure" as long as these activities are limited to between the hours of 7 a.m. and 6 p.m. Monday through Saturday, and between the hours of 9 a.m. and 6 p.m. on Sunday. Section 8.68.080 also requires the use of exhaust and intake silencers for internal combustion engines and provides for construction work to occur outside of the designated hours if the work is of urgent necessity and in the interest of public health and welfare for a period not to exceed three days.

Federal Transit Administration

The City of Sacramento does not have a quantified threshold for temporary construction noise and vibration. Therefore, to determine impact significance, the following FTA criteria are adopted.

A vibration or construction noise impact would occur if:

- Vibration levels would exceed 0.20 inches/second (in/sec) peak particle velocity (PPV) at the façade of a non-engineered structure (e.g., wood-frame residential). Additionally, the FTA's threshold of 72 vibration velocity (VdB) for frequent events will be used to assess vibration annoyance to residences at the nearby sensitive receptors.

- Project construction activities would generate noise levels greater than 80 dBA L_{eq} at the sensitive receptor property line.

Would the project result in:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIII. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?		X		
b) Generation of excessive groundborne vibration or groundborne noise levels?			X	

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X	

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.

Construction Noise

The total duration for project construction is anticipated to be approximately 27 months. Construction equipment for the proposed project would include equipment such as concrete saws, excavators, dozers, tractors, loaders, graders, cranes, lifts, rollers, pavers, and air compressors.

Two types of short-term noise impacts could occur during construction: (1) mobile-source noise from transport of workers, material deliveries, and debris and soil haul and (2) stationary-source noise from use of construction equipment.

Construction Vehicles

The transport of workers and materials to and from the construction site would incrementally increase noise levels along site access roadways. Individual construction vehicle pass-bys including haul trucks may create momentary noise levels of up to approximately 85 dBA L_{max} at 50 feet. However, these occurrences would generally be infrequent and short-lived.

Worker and vendor trips would total a maximum of 66 daily trips during overlapping building construction, paving, and architectural coating of Phase 2 and up to 22 daily haul truck trips during demolition of Phase 1.[3] Based on available data published by the city's traffic counts, existing average daily traffic (ADT) in the project area are approximately 3,463 (29th street between Meadowvale Avenue and Utah Avenue). The addition of up to 66 daily construction trips would result in a noise increase less than 0.1 dBA CNEL over existing conditions which would an indiscernible increase to nearby sensitive receivers. Therefore, construction-related trip noise would result in a less-than-significant impact.

Construction Equipment

Noise generated by onsite construction equipment is based on the type of equipment used, its location relative to sensitive receptors, and the timing and duration of noise-generating activities. Each stage of construction

[3] Based on information provided by Sacramento School District and the project air quality modeling.

involves different kinds of equipment and has distinct noise characteristics. Noise levels from construction activities are typically dominated by the loudest equipment. The dominant equipment noise source is typically the engine, although work-piece noise (such as dropping of materials) can also be noticeable.

The noise produced at each activity phase is determined by combining the L_{eq} contributions from each piece of equipment used at a given time, while accounting for the ongoing time-variations of noise emissions. Heavy equipment, such as a dozer or a loader, can have maximum, short-duration noise levels of up to 85 dBA at 50 feet. However, overall noise emissions vary considerably, depending on the specific activity performed at any given moment. Noise attenuation due to distance, the number and type of equipment, and the load and power requirements to accomplish tasks at each construction phase would result in different noise levels from construction activities at a given receptor. Since noise from construction equipment is intermittent and diminishes at a rate of at least 6 dBA per doubling of distance (conservatively ignoring other attenuation effects from air absorption, ground effects, and shielding effects), the average noise levels at noise-sensitive receptors could vary considerably, because mobile construction equipment would move around the site with different loads and power requirements.

Average noise levels from project-related construction activities are calculated by modeling the three loudest pieces of equipment per activity phase. Equipment for grading and site preparation is modeled at spatially averaged distances (i.e., from the acoustical center of the general construction site to the property line of the nearest receptors) because the area around the center of construction activities best represents the potential average construction-related noise levels at the various sensitive receptors for mobile equipment. Similarly, construction noise from paving, asphalt demolition, and building demolitions is modeled from the center of nearest paving and demolition areas.

The project is anticipated to be constructed in two developmental phases. The construction analysis modeled the worst-case scenario of the activity phases within each development phase. For example, Phase 1 and Phase 2 both have demolition activity, but demolition under Phase 1 is the worst case because it is closer to sensitive receptors and equipment mix averaged slightly louder than under Phase 2. Construction equipment for building construction and architectural coating is modeled from the edge of the proposed building to the nearest sensitive receptors.

The expected construction equipment mix was categorized by construction activity using the Federal Highway Administration (FHWA) Roadway Construction Noise Model (RCNM). The associated, aggregate sound levels—grouped by construction activity—are summarized in Table 7, *Project-Related Construction Noise, dBA Leq*. RCNM modeling input and output worksheets are included in Appendix C.

Table 7 Project-Related Construction Noise, dBA Leq

Construction Activity Phase	RCNM Reference Noise Level	Nearest Off-campus Receptors			
		Residences to the North	Residences to the East	Edward Kemble Park to the South	Residences to the West
Distance in feet	50	315	230	280	600
Phase 1 Demolition	85	71	66	69	67
Phase 1 Site Prep	83	69	64	67	65
Phase 1 Grading	85	71	66	69	67
Distance in feet	50	135	72	95	490
Phase 2 Building Construction	83	74	80	77	63
Architectural Coating	74	65	71	68	54
Distance in feet	50	80	50	75	570
Phase 1 Paving	85	81	85	82	64
Maximum dBA L_{eq}		**81**	**85**	**82**	**67**
Exceeds 80 dBA L_{eq} Threshold?		**Yes**	**Yes**	**Yes**	**No**

Notes: Calculations performed with the FHWA RCNM software are included in Appendix C.

Off-Campus Receptors

Residential Receptors

Construction is proposed to take place during the municipal code allowable hours of 7:00 AM to 6:00 PM, Monday through Saturday and between the hours of 9:00 AM to 6:00 PM on Sundays. However, as shown in Table 7, on average noise levels would not exceed the FTA threshold of 80 dBA L_{eq} at the nearest residential property line, except for residences to the north, east, and south during paving activity. This exceedance would result in a potentially significant.

Edward Kemble Park

The park is adjacent to the school property to south. Average construction noise could reach up to 82 dBA L_{eq} at the park from paving activity. Construction noise levels are therefore anticipated to exceed 80 dBA L_{eq} at Edward Kemble Park. Therefore, this would be a potentially significant impact.

With the implementation of Mitigation Measure N-1 noise from construction at the nearby impacted sensitive receptors would be reduced to a less than significant impact. Implementation of Mitigation Measure N-1 would reduce noise levels by at least 6 dBA with the use of the best available noise control techniques, specifically the use of proper engine mufflers. A study prepared for the US Department of Transportation found that in cases where a particular piece of equipment either does not have or has a very poor muffler the application of a good muffler will reduce the overall noise by 6 to 12 dBA (Toth 1979). The construction equipment modeled is assumed to not have any mufflers or sound attenuating devices installed. Therefore, reducing noise levels from the highest noise level produced of 85 dBA to 79 dBA L_{eq}. Thus, noise levels would be below the FTA criteria for temporary construction noise of 80 dBA L_{eq}.

3. Environmental Analysis

Mitigation Measures

N-1 The Sacramento City Unified School District shall adopt a Construction Noise Control Plan, including, but not be limited to the following:

- Limit construction to the hours allowed by the City of Sacramento (7:00 AM to 6:00 PM, Monday through Saturday and between the hours of 9:00 AM to 6:00 PM on Sundays) and prohibit construction on federal holidays.
- At least 30 days prior to the start of construction activities, all off-site businesses and residents within 300 feet of the project site shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the Sacramento City Unified School District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint.
- At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the Sacramento City Unified School District Facility Department's project hotline number and contractor's authorized representatives contact information that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall investigate, take appropriate corrective action, and report the action to the Sacramento City Unified School District.
- During the entire active construction period, equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds).
- Require the contractor to use impact tools (e.g., jack hammers and hoe rams) that are hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools.
- During the entire active construction period, stationary noise sources shall be located as far from sensitive receptors as possible, and they shall be muffled.
- During the entire active construction period, noisy operations shall be combined so that they occur in the same time period as the total noise level produced would not be significantly greater than the level produced if the operations were performed separately (and the noise would be of shorter duration).
- Select haul routes that avoid the greatest amount of sensitive use areas.

- Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes.
- During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws.

On-Campus Receptors - Interim Portable Classrooms

Students would be temporarily relocated to portable classrooms on site, while development of the remodeled school commences for the eastern half of the project site. Once phase one of developing the project site is completed, students would be allowed to move into the new buildings constructed during phase one; the portable classrooms along with the western half of the project site would be demolished and redeveloped during phase two. Students would be exposed to onsite construction noise during both phases. Most construction equipment could operate within 50 to 100 feet of temporary portable classrooms. As shown in Table 7, exterior construction noise levels can reach up to 85 dBA L_{eq}. Typical exterior to interior noise transmission loss (attenuation) is 25 dBA with windows closed. Thus, interior noise levels at classrooms are estimated to be 60 dBA or less. Construction noise from portable installation would be temporary and minimal equipment would be used (mainly the use of a crane to unload prefabricated portables from trucks). Portable installation and related trips would occur during the allowable hours of 7:00 AM to 6:00 PM, Monday through Saturday and between the hours of 9:00 AM to 6:00 PM on Sundays. This would be a less-than-significant impact.

Operational Noise

Traffic Noise

With the planned school remodel, the proposed project would not result in an increase in students. Additionally, there are no planned roadway upgrades associated with the proposed project. Therefore, the project would not result in a significant change in long-term traffic volumes. Therefore, traffic noise increases from the proposed project on nearby roadway segments would be less than significant and no mitigation measures are necessary.

Mechanical Equipment

The construction of new buildings would have mechanical HVAC systems. HVAC equipment would be new, and it is anticipated that the associated noise would be similar to existing HVAC equipment or quieter. For reference, typical HVAC noise is 72 dBA at 3 feet and the nearest sensitive receptors are residences approximately 95 feet to the west of the proposed buildings. At that distance, HVAC noise levels would attenuate to 42 dBA or less. This would not exceed the municipal code exterior noise limits for single-family residences at any time of day or night as shown in section 8.68.060 of the Sacramento Municipal Code (e.g., 55 dBA daytime and 50 dBA nighttime). This impact would be less than significant.

3. Environmental Analysis

Recreational Noise

The project includes the following:

- A new outdoor soccer field to the west of the project site where the existing Edward Kemble transitional kindergarten/kindergarten currently are located;
- Reconfiguration of the existing transitional kindergarten/kindergarten and elementary playgrounds, and basketball hardcourts to the center portion of the site;

These additions and reconfigurations could change the existing noise environment during outdoor student recreation activities. The reconfiguration of the existing transitional kindergarten/kindergarten and elementary playgrounds and hardcourts to be relocated to the center of the project site would not cause a significant noise increase or change in use from its existing outdoor recreational uses. Under the proposed project, the reconfiguration of outdoor recreational uses would be located further away from some of the surrounding residences than currently located under existing conditions. However, the addition and use of the new proposed soccer field could increase noise levels recreational noise levels at nearby sensitive receptors. PlaceWorks staff have collected noise measurements that relate to soccer activity on a soccer field. Noise measurements data show that at a distance of 15 feet noise levels from soccer field activities are 60 dBA L_{eq}. The nearest sensitive receptor to the proposed soccer field would be located approximately 60 feet to the west. At that distance, noise from the proposed soccer field would attenuate to 48 dBA L_{eq}. Therefore, noise from the new soccer field to the nearest residence would be below the City of Sacramento's exterior noise standards as set in the municipal code in section 8.68.060 for residential land uses for both day and nighttime criteria (55 and 50 dBA L_{eq} respectively). Therefore, recreational noise would be less than significant.

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

Less Than Significant Impact.

Operational Vibration

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

Construction Vibration

Vibration Annoyance

Groundborne vibration is rarely annoying to people who are outdoors, so it is usually evaluated in terms of indoor receivers. For annoyance, vibration is typically noticed nearby when objects in a building generate noise from rattling windows or picture frames. Since construction activities are typically distributed throughout the project site, vibration annoyance impacts are typically based on average vibration levels (levels that would be experienced by sensitive receptors most of the time). Therefore, to represent the average vibration level, distances to the nearest sensitive receptor buildings are measured from the center of the construction zone. For vibration annoyance, the FTA vibration level limit of 72 VdB will apply to the surrounding residential receptors.

Table 8, *Average Annoyance Vibration Levels from Construction Equipment,* shows the vibration levels from typical earthmoving construction equipment at the nearest receptors. As shown in the table, construction-generated vibration levels would not exceed 72 VdB at any nearby sensitive receptors. Additionally, vibration-related construction activities would occur in the daytime when residential land uses are least susceptible to vibration annoyance. Therefore, impacts related to construction vibration annoyance would be less than significant.

Table 8 Average Annoyance Vibration Levels from Construction Equipment

	Vibration Levels (VdB)				
Equipment	Reference Levels at 25 feet	Residences to North at 325 feet	Residences to East at 465 feet	Residences to South at 375 feet	Residences to West at 450 feet
Vibratory Roller	94	61	56	59	56
Large Bulldozer	87	54	49	52	49
Loaded Trucks	86	53	48	51	48
Jackhammer	79	46	41	44	41
Small Bulldozer	58	25	20	23	20
FTA Threshold	-	72	72	72	72
Exceeds Threshold?	-	**No**	**No**	**No**	**No**

Source: FTA 2006.
Bold numbers indicate values that exceed the FTA annoyance criteria.
Distances are from the center of the overall construction zone to the nearest receptor building within each land use type.

Vibration Damage

Construction Vibration

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

For reference, a vibration level of 0.2 in/sec PPV is used as the limit for non-engineered timber and masonry buildings (which would apply to the surrounding residential structures) (FTA 2018). Vibration damage is measured from the edge of the project site to the nearest structure (home) façade because vibration damage, unlike human vibration perception or annoyance, is determined by measuring instantaneous peak particle velocity generated by equipment. However, for receptors located to the south of the project site vibration damage is measured from the northern end of the parking lot rather than from the edge of the project site as the parking lot remains largely untouched, except for an expansion of a drop off lane on the northern side of the parking lot. Table 9, *Vibration Damage Levels for Typical Construction Equipment,* summarizes vibration levels for typical construction equipment at a reference distance of 25 feet and at the nearest sensitive receptors. As shown in Table 9, typical construction equipment can generate vibration levels up to 0.21 in/sec PPV at 25 feet. At distances greater than 25 feet, vibration levels would be less than 0.2 in/sec PPV.

Table 9 Vibration Damage Levels for Typical Construction Equipment

Equipment	PPV (in/sec)				
	FTA Reference at 25 feet	Residences to the north at 60 feet	Residences to the east at 55 feet	Residences to the south at 100 feet	Residences to the west at 65 feet
Vibratory Roller	0.21	0.056	0.064	0.026	0.050
Static Roller	0.05	0.013	0.015	0.006	0.012
Large Bulldozer	0.089	0.024	0.027	0.011	0.021
Loaded Trucks	0.076	0.020	0.023	0.010	0.018
Jackhammer	0.035	0.009	0.011	0.004	0.008
Small Bulldozer	0.003	0.001	0.001	0.000	0.001

Sources: Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual,* September 2018. New Zealand Transport Agency 2012.
NA= Not Applicable
Bold = Threshold exceedance

As shown in Table 9, vibration levels would not cause an exceedance of 0.2 in/sec PPV at any of the nearby sensitive receptors to the proposed remodeling, resulting in a less than significant impact.

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 proposed project is located approximately 1.6 miles southeast from the Sacramento Executive Airport. According to the Sacramento Airport Land Use Commission Plan (ALUCP) Noise Contour the project site is located outside the 65 dBA CNEL contour for the Sacramento Executive Airport (Sacramento 2022). As shown in the Sacramento 2030 General Plan, normally acceptable noise levels for schools would be 70 dBA CNEL. Therefore, since the project is located outside of the 65 dBA CNEL contour of the Sacramento Executive Airport, the project would not expose people working in the project area to excessive aircraft noise levels above the standards set in the Sacramento General Plan. Thus, the impact would be less than significant.

3.14 POPULATION AND HOUSING

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				X
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				X

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

No Impact. The proposed project would decrease capacity from 1,338 students to 850 students. It is expected that the students that would fill the new classrooms would be existing residents living within the District's service boundary, and the proposed project would not directly increase population growth in the area. No construction of home or businesses is proposed, nor extension of roads or other infrastructure. Project implementation would not induce population growth. No impact would occur.

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

No Impact. Project construction would be restricted to the existing campuses, with the exception of temporary fencing at Kemble Park, and no housing would be displaced replaced. No impact would occur.

3.15 PUBLIC SERVICES

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

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

3. Environmental Analysis

a) Fire protection?

Less Than Significant Impact. The closest fire station to the project site is the Sacramento Fire Department Station 16, located at 7363 24th Street in the City of Sacramento, approximately 0.35-mile northwest of the project site. Both the City Fire Marshal and DSA would be required to approve fire access around the site. Therefore, project implementation would not substantially affect the Department's response times or require expansion of fire protection services such that new or physically altered fire stations would be required. Impacts would be less than significant.

b) Police protection?

Less Than Significant Impact. Law enforcement and police protection services are provided by the Sacramento Police Department at 5770 Freeport Boulevard in Sacramento, approximately 2.65 miles northwest of the site. The improved parking and circulation onsite would reduce congestion in the adjacent neighborhood, potentially reducing response times to the site. Therefore, project implementation would not warrant additional law enforcement facilities. Impacts to police protection services would be less than significant.

c) Schools?

No Impact. School service needs are related to the size of a residential population, geographic area served, and community characteristics. The proposed project would completely rebuild the project site and combine the two existing schools into one school. Once constructed, the new school facilities would continue to serve the existing programs of Kemble Elementary School (grades TK-3) and Chavez Elementary School (grades 4-6), and students in the District's attendance area. No negative impact on school facilities or services would occur.

d) Parks?

Less than Significant Impact. The proposed project would not generate a demand for park space, which is typically caused by population and/or employment growth. The proposed project would improve the project site's recreational facilities and would allow for community use of the proposed soccer field with an approved permit. As such, impacts would be less than significant.

e) Other public facilities?

No Impact. The need for public services and facilities (e.g. libraries, hospitals, childcare, teen or senior centers) is typically caused by residential uses. As the project site is an existing school, and would continue to operate as a school, it would not result in the need for new or expanded public facilities. No impact would occur to public facilities.

3.16 RECREATION

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. RECREATION.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?			X	
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. Similar to existing conditions, operation of the project site would not require students to use existing neighborhood or regional parks. However, during construction activities, students would use Kemble Park as a playfield until construction activities end. Kemble Park would be temporarily fenced to ensure student safety; the fencing would be removed upon the completion of the proposed project. The proposed project would enhance and update the school's outdoor recreational spaces. Impacts to offsite recreational facilities as a result of the proposed project would not result in negative impacts. Impacts would be less than significant.

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?

Less Than Significant Impact. As discussed in section 3.16(a), the proposed project would not require construction of offsite recreational facilities to accommodate its program. The proposed project includes the rebuilding and enhancing of the recreational facilities at the project site. The environmental effects related to the whole project, including the recreational facility improvements and additions, are discussed throughout this Initial Study. Impacts would be less than significant.

3.17 TRANSPORTATION

Would the project:

3. Environmental Analysis

Issues	Potentially Significant Impact	Less Than Significant 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 § 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

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

No Impact. The proposed consolidation of the two existing elementary schools (Kemble Elementary School and Chavez Elementary School) would not adversely affect the school's vehicular, pedestrian, or bicycle access, not the onsite circulation system. The proposed project would result in an improvement to the access and circulation system. The two existing driveways on 29th Street would be consolidated into a single ingress/egress driveway that would align with the 29th Street/Flores Way intersection and would provide access to the project site for staff and parent's vehicles, as well as bicycles and pedestrians. The driveway on 32nd Street would remain in place and continue and continue to accommodate inbound and outbound traffic, as well as pedestrian and bicycle access.

The parking lot would extend along the entire southern edge of the campus and a recessed student drop-off/pick-up area would be provided on the northside of the parking lot at approximately the center of the campus. In addition, a new parking lot and drop-off/pick-up area would be provided for the transitional kindergarten/kindergarten component of the school on the north side of the campus, with access via two driveways on Torrance Avenue (an inbound driveway at the west end of the parking lot and an outbound driveway at the east end of the lot). An exclusive off-street bus loading/unloading area would be provided on the eastern portion of the site, adjacent to 32nd Street. This proposed configuration would separate the transitional kindergarten/kindergarten maneuvers and the bus activity from the general school traffic, which is a desirable design relative to access and circulation. The configuration is also more organized than the existing layout and would be more user-friendly to motorists because it provides an expanded parking lot and drop-off/pick-up system and accommodates ingress and egress from the east and west sides of the campus. The existing schools have a combined capacity of 1,338 students, and the design capacity of the proposed school is 850 students which is a decrease in students.

The pedestrian and bicycle access patterns to and from the school would remain unchanged as the streets in the immediate vicinity of the school have sidewalks along both sides of the street and have marked yellow pedestrian crosswalks at the most-directly affected intersections which are 29th Street at Loma Verde Way, 29th Street at Flores Way, 29th Street at 69th Avenue, 29th Street at Torrance Avenue, Torrance Avenue at 32nd

Street, and 32nd Street at Loma Verde Way. Pedestrians and bicyclists would enter the school campus from 29th Street, 32nd Street, and Torrance Avenue and proceed to their destinations within the campus. Bike racks would be provided on the school campus to accommodate student and staff members who would ride bicycles to and from the school. The school consolidation project would not significantly affect any public transportation facilities or operation because the proposed project would result in a decrease in capacity, and therefore, a decrease in public transit users.

In summary, the proposed project would not adversely affect traffic conditions on the study area street network or internal circulation system, nor would it affect the performance of any transit or non-motorized transportation facilities. The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway bicycle, and pedestrian facilities. Therefore, no impact would occur.

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

No Impact. Vehicle delays and levels of service (LOS) have historically been used as the basis for determining the significance of traffic impacts as standard practice in California Environmental Quality Act (CEQA) documents. On September 27, 2013, SB 743 was signed into law, starting a process that fundamentally changed transportation impact analyses as part of CEQA compliance. SB 743 eliminate auto delay, LOS, another similar measures of vehicular capacity or traffic congestion as the sole basis for determining significant impacts under CEQA. As part of the new CEQA Guidelines, the new criteria "shall promote the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099(b)(1)).

Pursuant to SB 743, the California Natural Resources Agency adopted revisions to the CEQA Guidelines on December 28, 2018, to implement SB 743. CEQA Guidelines Section 15064.3 describes how transportation impacts are to be analyzed after SB 743. Under the new Guidelines, metrics related to "vehicle miles traveled" (VMT) were required beginning July 1, 2020, to evaluate the significance of transportation impacts under CEQA for development projects, land use plans, and transportation infrastructure projects. The State provided an "opt-in period" and did not require lead agencies to apply for a VMT metric until July 1, 2020. However, in January 2020, State courts stated that under the Public Resources Code Section 21099, subdivision (b)(2), "automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment" under CEQA, except for roadway capacity projects.

As stated in the "Technical Advisory on Evaluating Transportation Impact in CEQA" (California Office or Planning and Research, December 2018) and the "Vehicle Miles Traveled – Focused Transportation Impact Study Guide (Caltrans, May 20, 2020), projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact and can be screened from a CEQA VMT analysis because they fall into the small project category.

While the proposed project would not result in an increase in the number of students at the project site, and would result in a reduced student capacity, the traffic associated with these students and staff would be traveling on the area's roadway network regardless of the status of the proposed project. The demand is generated by

the number of eligible and age-appropriate students in the area and is not generated by the size of the school's buildings. As there would be no increase in traffic volumes and as the proposed project is well below the CEQA VMT threshold of 110 trips per day, the proposed project can be screened from any further CEQA VMT analysis and would not result in a significant impact relative to VMT.

In addition to the State of California screening methodology, the "Transportation Analysis Guidelines" used by the County of Sacramento state that a project can be screened from requiring a CEQA VMT analysis if the project is a "Local-Serving Public Facilities/Services" type of land use, which includes a public K-12 school. As the proposed project falls into that category, it can be screened from any further VMT analysis.

Therefore, the proposed project would have no VMT impacts. No significant impact would occur.

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

No Impact. The proposed project would not provide any on- or off-site access or circulation features that would create or increase any design hazards or incompatible uses. Access to the school site for vehicles, bicyclists, and pedestrians would continue to occur via properly designed driveways, sidewalks, and onsite pedestrian pathways. The streets, intersections, driveways, and onsite circulation system are designed to accommodate the anticipated levels of vehicular and pedestrian activity and have historically been accommodating school-related traffic on a daily basis. They would continue to be compatible with the design and operation of a school. Additionally, the design of internal drive aisles, access driveways, and other circulation improvements would be required to adhere to the requirements of the Division of the State Architect and the City of Sacramento Fire Department. Compliance with established design standards would ensure that hazards due to design features would not occur and that the placement of the circulation improvements would not create a conflict for motorists, pedestrians, or bicyclists traveling within or around the project site. As the proposed project would not result in adverse changes to the access or circulation features at the project site or surrounding areas, and would improve access and circulation, no impacts would occur.

d) Result in inadequate emergency access?

No Impact. The proposed access and circulation features at the project site, including the driveways, onsite circulation roads, parking lots, and fire lanes, would accommodate emergency ingress and egress by fire trucks, police units, and ambulance/paramedic vehicles. The proposed project would accommodate emergency access to all areas of the campus. Additionally, the design of internal drive aisles, access driveways, and other circulation improvements would be required to adhere to the requirements of the Division of the State Architect and the City of Sacramento Fire Department. Compliance with established design standards would ensure emergency access within the site is adequate. Therefore, no impact would occur.

3.18 TRIBAL CULTURAL RESOURCES

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

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

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

No Impact. The project site contains Kemble Elementary School and Chavez Elementary School; the project site is not identified as a state or national historic resource, as indicated in Section 3.5(a), above. Construction of the proposed project would be within the footprint of the project site's boundaries, with the exception of the installation of the temporary fencing at Kemble Park. Therefore, there would be no impacts to historical resources.

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

3. Environmental Analysis

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. As part of the AB 52 process, Native American tribes must submit a written request to the District to be notified of projects within their traditionally and culturally affiliated area. The District must provide written, formal notification to those tribes within 14 days of deciding to undertake a project. The tribe must respond to the District within 30 days of receiving this notification if they want to engage in consultation on the project, and the District must begin the consultation process within 30 days of receiving the tribe's request. Consultation concludes under these circumstances: 1) the parties agree to mitigation measures to avoid a significant effect on a tribal cultural resources; 2) a party, acting in good faith and after reasonable effort, concludes mutual agreement cannot be reached; or 3) a tribe does not engage in the consultation process or provide comments.

The District has not been contacted, per AB 52, and the consultation process has not been triggered. However, per District policy, the District sent notification letters to the following tribes on March 15, 2023: Wilton Rancheria, Buena Vista Rancheria, Shingle Springs Rancheria, Upper Lake Rancheria, and the United Auburn Indian Community of the Auburn Rancheria.

On March 24, 2023, the Wilton Rancheria Tribe responded stating that the project site falls within the Tribe's ancestral territory, and provided mitigation measures should inadvertent discoveries be made during construction, which have been incorporated in Mitigation Measure TCR-1. The Wilton Rancheria Tribe indicated that they do not have any concerns with the project but would like to discuss the possibility of adding interpretive/education signage to recognize the indigenous history of the area.

The United Auburn Indian Community of the Auburn Rancheria Tribe conducted background search for the identification of Tribal Cultural Resources for the proposed project, which included a review of pertinent literature, historic maps, and a records search using United Auburn Indian Community of the Auburn Rancheria Tribe's Tribal Historic Information System (THRIS). United Auburn Indian Community of the Auburn Rancheria Tribe's THRIS database is composed of United Auburn Indian Community of the Auburn Rancheria Tribe's areas of oral history, ethnographic history, and places of cultural and religious significance, including United Auburn Indian Community of the Auburn Rancheria Tribe Sacred Lands that are submitted to the Native American Heritage Commission. The THRIS resources shown in this region also include previously recorded indigenous resources identified through the California Historic Resources Information System Center as well as historic resources and survey data.

The United Auburn Indian Community of the Auburn Rancheria Tribe is a federally recognized Tribe comprised of both Miwok and Maidu (Nisenan) Tribal members who are traditionally and culturally affiliated with the project area. The Tribe has a deep spiritual, cultural, and physical ties to their ancestral land and are contemporary stewards of their culture and landscapes. The Tribal community represents a continuity and endurance of their ancestors by maintaining their connection to their history and culture. It is the Tribe's goal to ensure the preservation and continuance of their cultural heritage for current and future generations.

On March 27, 2023, the United Auburn Indian Community of the Auburn Rancheria Tribe responded stating that their records do not indicate the presence of any known tribal cultural resources, and have provided standard mitigation measure, which has been incorporated in Mitigation Measure TCR-1.

The project site is not identified as historically significant in a California Register of Historic Resources or meets any of the criteria for listing in the National Register of Historic Places. The proposed project would reconstruct the project site and combining both schools to create an elementary school. Although the project site is currently developed and is not within an archaeological sensitive area, as the proposed project would include ground-disturbing activities, there is a potential to discover previously unidentified subsurface tribal cultural resources. Therefore, Mitigation Measure TCR-1 has been incorporated to reduce impacts to a less than significant level.

Mitigation Measures

TCR-1 Prior to any ground disturbing construction activities, a Wilton Rancheria Native American monitor shall be identified to be on call.

Upon discovery of any tribal cultural resources, construction activities shall cease within 100 feet of the find until the tribal monitor can assess the find and provide recommendations. The evaluation of all tribal cultural resources unearthed by project construction activities shall be evaluated by the tribal monitor. If the resources are Native American in origin, the tribal monitor shall coordinate with the District regarding treatment of these resources as well as notifying local tribes of the find. Typically, the tribe(s) will request reburial, preservation in place within the landscape, the minimization of handling of the objects, construction monitoring of any further activities, or returning objects to a location within the project area where they will not be subject to future impacts. The District may continue work on other parts of the project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). Work in the area(s) of the cultural find may only proceed after all necessary investigation and evaluation of the discovery under the requirements of CEQA, including AB 52, have been satisfied, as well as with authorization from the District in coordination with the Tribe. If the tribal monitor determines a resource to constitute a "historical resource" or "unique archaeological resource," time and funding sufficient to allow for implementation of avoidance measures or appropriate mitigation must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Section 21083.2(b) for unique archaeological resources.

The project contractor shall implement any measures deemed by the District to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a tribal cultural resource may include tribal monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil.

If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis for curation, only if specifically requested by the Tribe. The District shall be responsible for ensuring that a public, nonprofit institution with a research interest in the materials, such as the North Central Information Center and California State University, Sacramento Natural History Museums, curate any historic archaeological material that is not Native American in origin if such an institution agrees to accept the material. If no institution accepts the archaeological material, the District shall offer it to a local historical society for educational purposes or retain the material and use it for educational purposes. The Wilton Rancheria contact information is as follows:

Wilton Rancheria – Cultural Preservation Department
Tel: 916.683.6000
cpd@wiltonrancheria-nsn.gov

3.19 UTILITIES AND SERVICE SYSTEMS

Would the project:

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			X	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?			X	
c) Result in a determination by the waste water treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			X	
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	

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

Less Than Significant Impact. The proposed project involves rebuilding and consolidation of the two schools on the project site. The proposed project would result in a decrease in capacity. The proposed project would demolish and reconstruct all utilities onsite. Therefore, as utilities would not be expanded or relocated, impacts would be 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 proposed project is within the Central Valley Regional Water Quality Control Board region. As student capacity at the site would decrease, the water needs are expected to decrease compared to existing conditions; therefore, water supply is anticipated to be sufficient for the proposed project and impacts would be less than significant.

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

Less Than Significant Impact. The City of Sacramento is responsible for the collection of wastewater within the City. The proposed project would result in a decrease in capacity; therefore, it is anticipated that the wastewater facilities would continue to have adequate capacity to serve the proposed project. Therefore, impacts would be less than significant.

d) Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. Waste from the proposed project would be transported to the Sacramento County Landfill at 12701 Kiefer Boulevard in Sloughhouse, California. The Sacramento County Landfill has a maximum daily permitted disposal rate of 10,815 tons per day (CalRecycle 2019). The Landfill has a remaining capacity of 112,900,000 cubic yards and a cease operation date of January 1, 2026 (CalRecycle 2019).

The proposed improvements would not result in an increase in the student or staff populations, but result in a decrease in capacity, and therefore, generation of waste during operational activities would be less than existing conditions. Project impacts on landfill capacity would be less than significant.

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

Less Than Significant Impact. Solid waste would be generated during construction and operation of the proposed project. The proposed project would comply with all regulations pertaining to solid waste, such as the California Integrated Waste Management Act. The District and its construction contractor would comply with all applicable laws and regulations and make every effort to reuse and/or recycle the construction debris

that would otherwise be taken to a landfill. Hazardous waste, such as paint used during construction, would be disposed of only at facilities permitted to receive them in accordance with local, state, and federal regulations. The proposed project would comply with all applicable local, state, and federal statutes and regulations related to solid waste disposal. Therefore, impacts would be less than significant.

3.20 WILDFIRE

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

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
XX. WILDFIRE. If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?			X	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?			X	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?			X	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?			X	

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

Less Than Significant Impact. The proposed project would not conflict with adopted emergency response or evacuation plans. The surrounding roadways would continue to provide emergency access to the project site and surrounding properties during construction and operation. Both the City Fire Marshal and DSA would be required to approve fire access around the site. As part of the DSA process, a Fire and Life Safety Review would be conducted when DSA would review building construction and how occupants can safely exit the buildings in case of a fire. The proposed project would not result in inadequate emergency access, and impacts would be less than significant.

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

Less Than Significant Impact. There are three primary factors used in assessing wildfire hazards—topography, weather, and fuel. The project site is relatively flat and is in a predominantly urbanized environment. The proposed project would not impact weather or topography. At project completion, the site would include pervious and impervious surfaces. According to CAL FIRE, the project site is not within a VHFHSZ (CAL FIRE 2022). Therefore, the project and site conditions would not contribute to an increase in exposure to wildfire risk. By complying with the CBC and CFC, impacts would be less than significant.

3. Environmental Analysis

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

Less Than Significant Impact. Due to the reconfiguration of buildings onsite, the proposed project would require changes to the connections to utilities such as electricity, water, and sewer. The utilities would be installed to meet service requirements. The construction of infrastructure improvements for the project would not directly fire risk. The project site is currently developed and located in an urbanized portion of the City. Impacts would be less than significant.

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

Less Than Significant Impact. The project site is relatively flat. No landslides have been mapped on the site (CDC 2022d). Additionally, the project site is developed with an existing school and is within Zone X, Area with Reduced Flood Risk Due to Levee (Flood Insurance Rate Map ID #06067C0305H) (FEMA 2012). Construction activities related to the proposed project would be subject to compliance with the CBC and would include BMPs. Therefore, with implementation of BMPs and compliance with the CBC, impacts would be less than significant.

3.21 MANDATORY FINDINGS OF SIGNIFICANCE

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

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

Less Than Significant Impact With Mitigation Incorporated. The proposed project would improve the facilities on the project site, and consolidate the two schools into one. The proposed project would result in a decrease in student capacity. The proposed project would comply with the MBTA bird nesting season restrictions and therefore would not result in impacts to nesting regulatory birds protected by the MBTA. The proposed project would occur within the school's existing fence line, with the exception of the temporary fencing at Kemble Park; no sensitive animal or plant species would be impacted. Mitigation Measures BIO-1 and BIO-2 would be implemented to mitigate damage to the preserved trees onsite. Additionally, the implementation of Mitigation Measures CUL-1, GEO-1, and TCR-1 would ensure that archaeological, paleontological, and tribal cultural resources, respectively, are protected and preserved. Therefore, impacts would be less than significant with mitigation incorporated.

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable

when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Less Than Significant Impact. The proposed project would improve the existing school facilities and consolidate both schools into one school on the project site. The proposed project would result in a decrease in capacity at the school. The proposed project would improve parking and queuing onsite, thereby reducing congestion on the surrounding roadways. Therefore, the proposed project would not result in cumulative impacts in the surrounding area.

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. The proposed project would improve the facilities at the school and would improve parking and queuing onsite. The proposed circulation changes would provide access to the site for staff and parent's vehicles, as well as bicycles and pedestrians. The proposed configuration would separate the transitional kindergarten/kindergarten maneuvers and bus activity from the general school traffic which would result in a more organized and user-friendly circulation system. The proposed project would result in a decrease in student capacity. As demonstrated in this Initial Study, the proposed project would not substantially increase environmental effects that would directly or indirectly affect human beings. The proposed project would implement Mitigation Measure N-1 which would adopt a Construction Noise Control Plan to reduce noise impacts on sensitive receptors. Impacts would be less than significant with mitigation incorporated.

4. References

AirNav.com. 2022. Airports. https://www.airnav.com/airports/KSAC.

Bay Area Air Quality Management District (BAAQMD). 2017a, May. California Environmental Quality Act Air Quality Guidelines. 2017a (revised). http://www.baaqmd.gov/~/media/files/planning-and-research/ceqa/ceqa_guidelines_may2017-pdf.

California Air Resources Board (CARB). 2018, October 25, 2018. 2018 Updates to the California State Implementation Plan. https://www.arb.ca.gov/planning/sip/2018sipupdate/2018updat e.pdf?_ga=2.19332344.1366902301.1669752473-1515111945.1627578145, accessed November 30, 2022.

———. 2023. Proposed Advanced Clean Cars II Regulations: All New Passenger Vehicles Sold in California to be Zero Emissions by 2035. https://ww2.arb.ca.gov/our-work/programs/advanced-clean-cars-program/advanced-clean-cars-ii.

California Department of Conservation (CDC). 2022a. California Important Farmland Finder. https://maps.conservation.ca.gov/dlrp/ciff/

_____. 2022b. Alquist-Priolo Site Investigation Reports. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps

_____. 2022c. Fault Activity Map of California. https://maps.conservation.ca.gov/cgs/fam/

_____. 2022d. CGS Warehouse. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps

_____. 2022e. CGS Information Warehouse – Mineral Lands Classification. Mineral Land Classification Map of Concrete Aggregate in the Greater Sacramento Area Production-Consumption Region. https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=regulatorymaps

California Department of Education (CDE). 2022a. Data Quest – Kemble Elementary Report (34-67439-6033914). https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=34674396033914&agglevel=school&year=2021-22.

_____. 2022b. Data Quest – Chavez Intermediate Report (34-67439-6119440). https://dq.cde.ca.gov/dataquest/dqcensus/EnrGrdLevels.aspx?cds=34674396119440&agglevel=school&year=2021-22.

4. References

California Department of Transportation (Caltrans). 2022. Scenic Highways. https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways

California Office of Historic Places (OHP). 2022. California Historical Resources. https://ohp.parks.ca.gov/ListedResources/?view=county&criteria=34.

California Department of Forestry and Fire Protection (CAL FIRE). 2022 (accessed). FHSZ Viewer. https://egis.fire.ca.gov/FHSZ/

California Department of Resources and Recovery (CalRecycle). 2019. SWIS Facility Detail: Sacramento County Landfill (34-AA-0001). https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2070?siteID=2507

Department of Toxic Substances Control (DTSC). 2022. Envirostor. Database. https://www.envirostor.dtsc.ca.gov/public/.

California Department of Water Resources (DWR). 2022. Dam Breach and Inundation Maps. https://fmds.water.ca.gov/webgis/?appid=dam_prototype_v2

ECORP Consulting, Inc. (ECORP). 2023, February 21. Arborist Survey Report for the Edward Kemble and Cesar Chavez Elementary Schools Project.

Federal Emergency Management Agency (FEMA). 2012, August 16. Flood Map Service. Flood Insurance Rate Map ID #06067C0305H. https://msc.fema.gov/portal/search?AddressQuery=7500%2032nd%20street%20sacramento%20ca#searchresultsanchor

Federal Highway Administration. 2006, August. *Construction Noise Handbook*.

Federal Highway Administration (FHWA). 2006, January. FHWA Roadway Construction Noise Model (RCNM) User's Guide.

Federal Transit Administration (FTA). 2018, September. *Transit Noise and Vibration Impact Assessment*.

National Parks Service (NPS). 2020, September. National Register of Historic Places. https://www.nps.gov/maps/full.html?mapId=7ad17cc9-b808-4ff8-a2f9-a99909164466

New Zealand Transport Agency 2012. *Ground Vibration from Road Construction*.

Office of Environmental Health Hazard Assessment (OEHHA). 2015, February. Air Toxics Hot Spots Program, Risk Assessment Guidelines: Guidance Manual for Preparation of Health Risk Assessments, https://oehha.ca.gov/media/downloads/crnr/2015guidancemanual.pdf, accessed December 20, 2022.

4. References

Pacific Gas & Electric (PG&E). 2022. PG&E's Climate Strategy Report, https://www.pge.com/en_US/about-pge/environment/what-we-are-doing/pge-climate-goals/pge-climate-goals.page, accessed December 16, 2022.

PlaceWorks. 2023a, January. Air Quality and Greenhouse Gas Emissions Analysis.

———. 2023b, January. Noise Analysis.

Sacramento.aero. 2022. Sacramento Executive Airport Noise Contour. https://sacramento.aero/scas/environment/noise/executive_airport_sac/noise_contours1

Sacramento Area Council of Governments (SACOG). 1999, May. Sacramento Executive Airport Comprehensive Land Use Plan. https://www.sacog.org/sites/main/files/file-attachments/sacramentoexecclup.pdf

_____. 2019, November. 2020 Metropolitan Transportation Plan/Sustainable Communities Strategy (MTP/SCS), https://www.sacog.org/sites/main/files/file- attachments/2020_mtp-scs.pdf?1580330993, accessed December 16, 2022.

Sacramento City Unified School District (SCUSD). 2020a, June 8. Facility Condition Assessment – Chavez Elementary School. https://dl.airtable.com/.attachments/09f7a0475c7d31eeb0e7814f04401933/dbc7825b/136988.19R000-014.322-CesarE.ChavezElementarySchool-SacramentoCA-FCAFinal.pdf

_____. 2020b, June 9. Facility Condition Assessment – Kemble Elementary School. https://dl.airtable.com/.attachments/c2b9d0e71b1e74ec662819b0339fbec9/c005b2e0/136988.19R000-019.322-EdwardKembleElementarySchool-SacramentoCA-FCAFinal.pdf

Sacramento, City of. 2009. 2030 Sacramento General Plan: https://www.cityofsacramento.org/Community-Development/Planning/Long-Range/General-Plan/2030-General-Plan.

_____. 2015a. 2035 Sacramento General Plan – Environmental Resources Background Report. http://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/General-Plan/2035-GP/Chapter-6---Environmental-Resources.pdf?la=en

_____. 2015b. 2035 Sacramento General Plan Future Noise Contours (Appendix C): https://www.cityofsacramento.org/-/media/Corporate/Files/CDD/Planning/General-Plan/2035-GP/Appendix-C---Noise-Contours.pdf?la=en.

_____ 2022, November. Sacramento, California Noise Municipal Code. https://library.qcode.us/lib/sacramento_ca/pub/city_code/item/title_8-chapter_8_68?view=all#title_8-chapter_8_68-article_ii.

_____. 2023, January 13 (accessed). Sacramento, California Traffic Counts. http://www.cityofsacramento.org/public-works/transportation/traffic-data-maps/traffic-counts.

4. References

Sacramento, County of. 2021 Local Hazard Mitigation Plan. Appendix F – City of Sacramento. https://waterresources.saccounty.gov/stormready/Pages/2021-Local-Hazard-Mitigation-Plan.aspx

_____. 2022, August. Climate Action Plan, https://planning.saccounty.net/PlansandProjectsIn-Progress/Documents/Climate%20Action%20Plan/Final%20Climate%20Action%20Plan.pdf, accessed December 19, 2022.

Sacramento Metropolitan Air Quality Management District (SMAQMD). 2009. Guide to Air Quality Assessments in Sacramento County (CEQA Guide), https://www.airquality.org/businesses/ceqa-land-use-planning/ceqa-guidance-tools, accessed December 20, 2022.

———. 2020a. CEQA Guide Chapter 2: Environmental Review, Thresholds of Significance Table, https://www.airquality.org/LandUseTransportation/Documents/CH2ThresholdsTable4-2020.pdf, accessed January 10, 2023.

———. 2020b. CEQA Guide Chapter 5: Toxic Air Contaminants, https://www.airquality.org/LandUseTransportation/Documents/Ch5TAC4-2020.pdf, accessed December 19, 2022.

———. 2020c. October. Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District. https://www.airquality.org/LandUseTransportation/Documents/SMAQMDFriant RanchFinalOct2020.pdf, accessed January 11, 2023.

———. 2021. CEQA Guide Chapter 6: Greenhouse Gases, https://www.airquality.org/LandUseTransportation/Documents/Ch6GHG2-26-2021.pdf, accessed December 19, 2022.

———. 2022. Federal Planning, https://www.airquality.org/residents/air-quality-plans/federal-planning, accessed December 19, 2022.

Sacramento Municipal Utility District (SMUD). 2022. Clean Energy FAQs, https://www.smud.org/en/Corporate/Environmental-Leadership/2030-Clean-Energy-Vision/Zero-carbon-frequently-asked-questions, accessed December 16, 2022.

———. 2023. Our 2030 Clean Energy Vision, https://www.smud.org/en/Corporate/Environmental-Leadership/2030-Clean-Energy-Vision.

State Water Resources Control Board (SWRCB). 2022. Geotracker. Database. https://geotracker.waterboards.ca.gov/.

Toth, William J. 1979, August (Toth 1979). Noise Abatement Techniques for Construction Equipment. Prepared for US Department of Transportation National Highway Traffic Safety Administration.

United States Fish and Wildlife Service (USFWS). 2022. Wetlands Mapper. https://fwsprimary.wim.usgs.gov/wetlands/apps/wetlands-mapper/

4. References

United States Geological Survey (USGS). 2022. (accessed). Areas of Land Subsidence in California. https://ca.water.usgs.gov/land_subsidence/california-subsidence-areas.html.

5. List of Preparers

LEAD AGENCY

Nathaniel Browning, Facilities Director, Facilities Support Services

PLACEWORKS

Dwayne Mears, Principal

Jasmine A. Osman, Associate II

Lance Park, Air Quality and Greenhouse Gas, Senior Associate

Alejandro Garcia, INCE-USA, Noise and Vibration, Senior Associate

Emily Parks, Air Quality and Greenhouse Gas, Associate I

Abdul Khan, Noise and Vibration, Project Planner

Cary Nakama, Graphic Artist

KITCHELL ARCHITECTS

Dan Porter, Program Director

Eli Gero, Project Manager

ECORP CONSULTING, INC.

Krissy Walker-Berry, Arborist

Levon Bajakian, Biologist

GARLAND AND ASSOCIATES

Richard Garland, PE, Traffic Engineer

5. List of Preparers

This page intentionally left blank.