April 2023 | Initial Study/Mitigated Negative Declaration

NICHOLAS ELEMENTARY SCHOOL REPLACEMENT PROJECT

Sacramento City Unified School District

Prepared for:

Sacramento City Unified School District
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PLACEWORKS

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Abbreviations and Acronyms

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

Abbreviations and Acronyms

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

Abbreviations and Acronyms

MPO	metropolitan planning organization
MT	metric ton
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 demolish the existing Nicholas Elementary School campus and replace it based on the District's Facilities Master Plan, education specifications, and 21st century educational concepts. The 10.1-acre school site is located at 6601 Steiner Drive in the Parkway community of Sacramento County. The rebuild project would address the most critical physical needs of the buildings and grounds at the campus through the rebuilding and reconfiguration of the campus. 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 approximately 10.1-acre project site encompasses the Nicholas Elementary School property at 6601 Steiner Drive in the unincorporated area of Sacramento County. The project site consists of Assessor's Parcel Number (APN) 039-0133-011-0000, and is in the Parkway community, a census-designated place in south Sacramento County. The project site is bound by residential uses that face Sitton Way to the north, residential uses and the Allegheny Wesleyan Methodist Church along Steiner Drive to the west, residential uses facing Frawley Way to the south, and residential uses and a facility owned by California American Water along Vernace Way to the east of the project site.

The County of Sacramento includes the cities of Sacramento, Elk Grove, Rancho Cordova, Folsom, Citrus Heights, Galt, and Isleton, and several populated unincorporated communities. It is bounded by Yolo County and Solano County to the west; San Joaquin County to the south; Placer County and Sutter County to the North; and El Dorado County to the east. The project site is approximately 0.6-mile to the east of State Route 99 (SR-99), 4 miles east of Interstate 5 (I-5), and 3.43 miles south of US Route 50 (US-50). 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 K-6 school and consists of 10 buildings. These include four permanent buildings constructed in 1962 and six portables that have been added to the campus between 1991 and 2003

1. Introduction

(SCUSD 2020). The campus includes a multi-purpose room, library, kitchen, administration offices, transitional kindergarten/kindergarten classrooms, classrooms for grades 1 through 6, and a separate portable building for restroom facilities (SCUSD 2020). The campus consists of 28 classrooms in total and the total square footage of the buildings onsite is 43,318 square feet. The buildings are in the northwestern portion of the site. The central area of the site, between the buildings, contains the play structures and hardcourts. Multi-use fields surround the school buildings on the eastern and southern portions of the site.

According to information provided by the Sacramento Municipal Utility District (SMUD), there is one 69 kilovolt (kV) double-circuit overhead transmission line and one 230 kV double-circuit transmission line immediately north of the existing school within a 100-foot-wide easement that extends approximately 50 feet onto the school property, as shown on Figure 3. Further to the north, SMUD owns a 115 kV double-circuit transmission line adjacent and north of the school property. The nearest high voltage (greater than 50 kV) powerlines to the existing school uses are the 230 kV and 69 kV powerlines which are on the same monopole.

California Code of Regulations (CCR), Title 5, Section 14010(c) specifies a distance setback requirement of 150 feet from 200-230 kV overhead power transmission lines for proposed school sites, if limited uses would occur within the area (e.g., parking lots, landscaping). Figure 3 shows the northern portion of the existing school site that is within the 150-foot setback area from the nearest 230 kV power line. The setback area extends approximately 120 feet onto the school site. Current school uses within the setback area include school buildings, hard courts, and grass playfields.

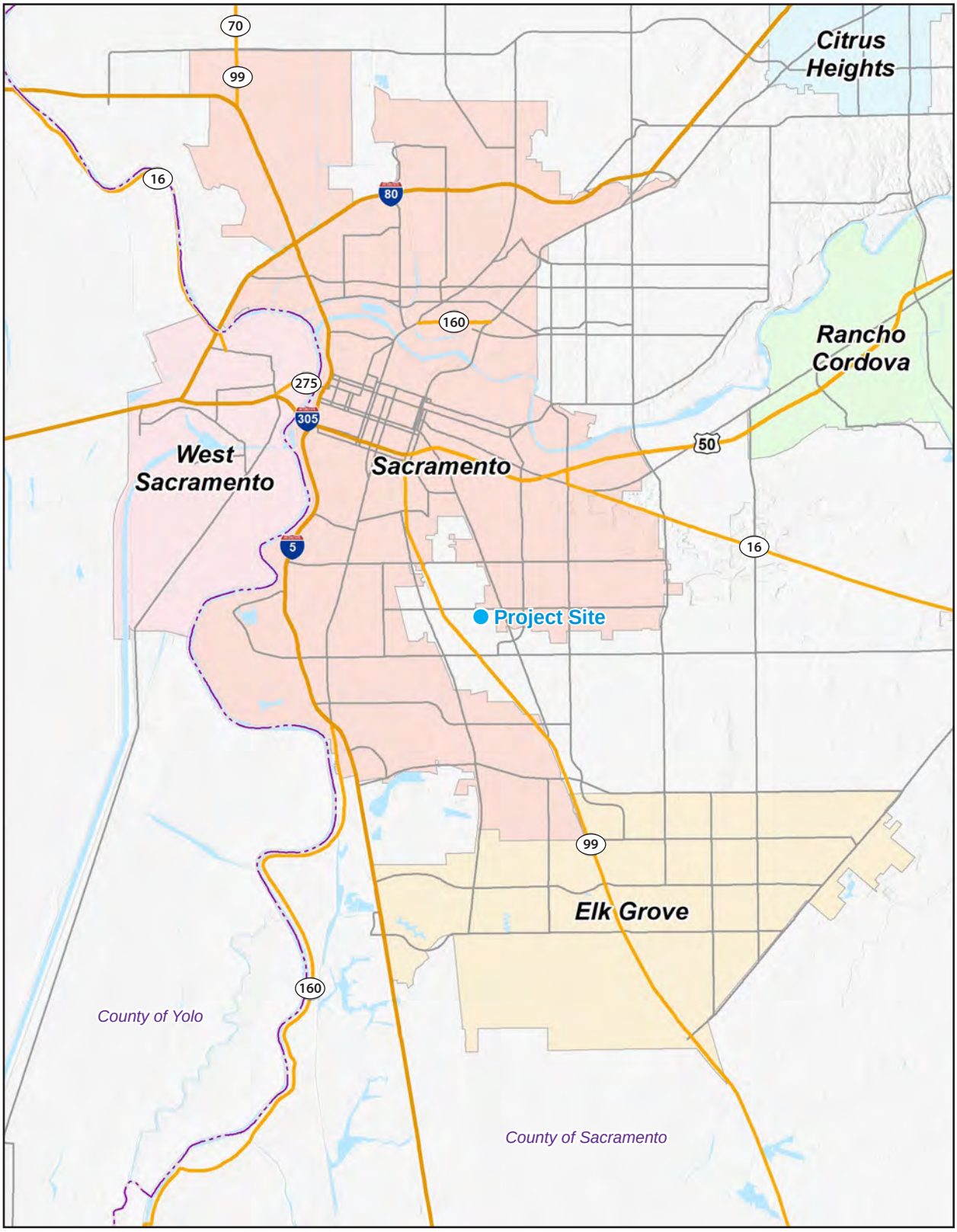
Figure 2 shows the existing site facilities from an aerial view. Figures 4a-4c, *Site Photographs,* show photos of the project site. According to the Facilities Condition Assessment for Nicholas Elementary School, all facilities, except for the restroom outbuilding, will near the end of their serviceable lives by 2024. While the Assessment did not identify any immediate needs, it noted several key findings including multiple exterior walls, windows, parking lots, and packaged rooftop units (RTUs) in poor condition (SCUSD 2020).

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

Access and Parking

The school's driveway and parking lot are located at the southwestern portion of the site. Ingress and egress to the campus is provided through two driveways on Steiner Drive, which lead to the staff surface parking lot. The staff surface parking lot contains 42 spaces. The parking lot is not accessible for student pick-up and drop-off; pick-up and drop-off occurs adjacent to the campus on the school-side of Steiner Drive (WalkSacramento 2022). Parents and visitors are directed to park and walk into the school from the opposite side of Steiner Drive, and the neighboring streets of Fawley Way and 51st Street in order to access the school (WalkSacramento 2022). The District's 2012 Sustainable Facilities Master Plan further states that the parking lot does not have a dedicated school bus lane and parent drop-off which has caused unsafe conditions when parents drop students off (SCUSD 2012).

Figure 1 - Regional Location



Note: Unincorporated county areas are shown in white.
Source: Generated using ArcMap, Inc., 2023.

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Scale (Miles)

1. Introduction

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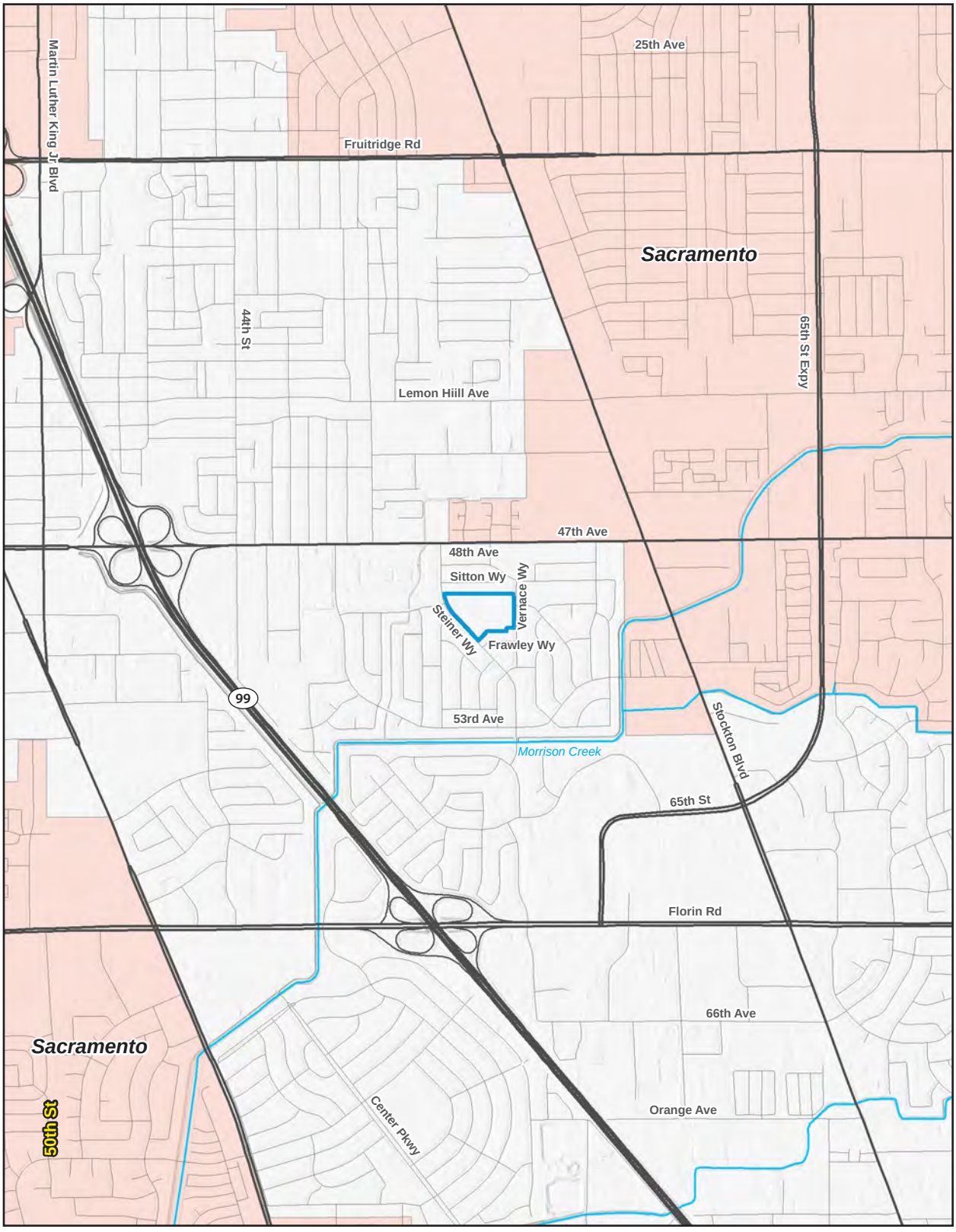
Figure 2 - Local Vicinity



Nicholas Elementary School Boundary

Note: Unincorporated county areas are shown in white.

Source: Generated using ArcMap, Inc., 2023.

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1. Introduction

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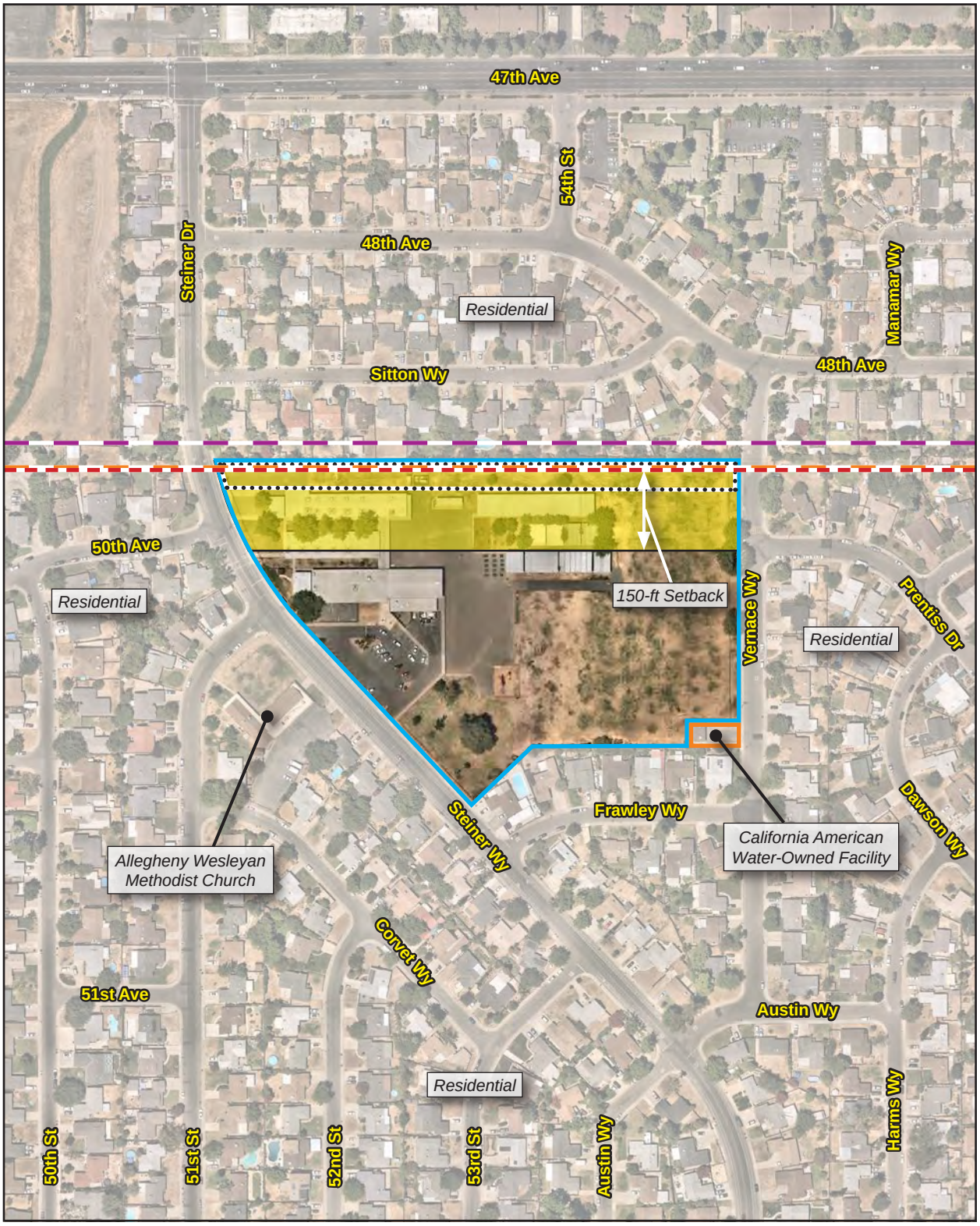
Figure 3 - Aerial Photograph



Source: Nearmap, Inc., 2023.

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Figure 4a - Site Photographs

View of Nicholas Elementary School parking lot and administration buildings.

View of Nicholas Elementary School looking southeast.

Source: PlaceWorks, 2023.

1. Introduction

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Figure 4b - Site Photographs

View of Vernace Way facing south.

View of Steiner Drive facing south.

Source: PlaceWorks, 2023.

1. Introduction

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Figure 4c - Site Photographs

View of Nicholas Elementary School portables and hardcourts.

View of Nicholas Elementary School oak tree.

Source: PlaceWorks, 2023.

1. Introduction

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Operations

Nicholas Elementary School is one of 75 schools operated by the District. Nicholas Elementary School offers transitional kindergarten/kindergarten and grades 1 through 6. Special Day Class (SDC) Kindergarten classes start at 9 AM and are dismissed at 12:20 PM on Mondays through Fridays. "PM Kindergarten" (afternoon Kindergarten) classes start at 11:40 AM and are dismissed at 3:12 PM on Mondays through Wednesdays, and Fridays; on Thursday PM Kindergarten classes are dismissed at 2:12 PM. Grades 1 through 6 start school at 9 AM and are dismissed at 3:12 PM on Mondays through Wednesdays, and Fridays; on Thursdays grades 1 through 6 are dismissed at 2:12 PM (Nicholas Elementary School 2022).

The 2021-2022 school year enrolled 541 students. Nicholas Elementary School's highest enrollment of 660 students occurred during the 2012-2013 school year, and over the last 10 school years, the school had an average enrollment of 627 students. Table 1, *Nicholas Elementary School 10-Year Enrollment History,* shows the 10-year enrollment history for Nicholas Elementary School.

Table 1 Nicholas Elementary School 10-Year Enrollment History

School Year	Enrollment
2021-2022	541
2020-2021	571
2019-2020	618
2018-2019	636
2017-2018	651
2016-2017	655
2015-2016	653
2014-2015	636
2013-2014	652
2012-2013	660
10-Year Average Enrollment:	627

Source: CDE 2022

The total current capacity of the school is 28 classrooms (683 students).

1.2.2 Surrounding Land Use

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

- **North:** Sitton Way and single-family residences.
- **East:** Vernace Way, single-family residences, and a facility owned by California American Water.
- **South:** Frawley Way, single-family residences.
- **West:** Steiner Drive, single-family residences, and Allegheny Wesleyan Methodist Church.

1.3 EXISTING ZONING AND GENERAL PLAN

The County of Sacramento General Plan Land Use Designation for the project site is Low Density Residential (Sacramento County 2013). The project site is zoned Residential Density (RD-5) (Sacramento County 1978). Under the RD-5 zone, public educational facilities for grades K-12 are a permitted primary use, according to Sacramento County Zoning Code Section 3.2.5, Allowed Uses in All Zoning Districts, Table 3.1, Allowed Uses. "Permitted Primary Use" is a use allowed by right, subject to complying with the regulations of the respective zoning district in which the use is located, including Design Review. Additionally, the District may exempt the site from local zoning under its authority under Government Code 53094. All areas surrounding the school site are also designated Low Density Residential and zoned RD-5.

1.4 DISTRICT ACTION REQUESTED

The Initial Study/Mitigated Negative Declaration examines the potential environmental impacts of the proposed Nicholas Elementary School Replacement 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 Nicholas Elementary School. The capacity of the school after the rebuild would decrease by one classroom though capacity would remain the same, resulting in 27 classrooms and 683 students. Pedestrian access to the site would be provided via Steiner Drive and Vernace Way.

As explained in Section 1.2.1, *Existing Land Use*, the project site contains one 69 kV double-circuit overhead transmission line and one 230 kV double-circuit transmission line that are within a 100-foot wide easement. Approximately 50 feet of this easement is within the school property. A chain link fence would be placed at the southern edge of the SMUD easement to restrict access to the utility right-of-way. Consistent with State

guidelines and requirements, all proposed buildings would be set back approximately 150 feet from the southern edge of this easement and approximately 175 feet from the nearest 230 kV transmission line. Under the proposed site plan, portions of the northern parking lot, basketball courts, and soccer field would be within the 150-foot setback area, while all proposed buildings are outside of the setback area.

The District will not seek matching state funds at this time. The District seeks to submit plans to California Division of the State Architect (DSA) on May 1, 2023 for the site work, and July 15, 2023 for the buildings/final site plan. Construction is estimated to start approximately August 2023 and construction activities would end approximately June 2025. School opening would be planned for Fall 2025. Figure 5, *Conceptual Site Plan,* shows the proposed improvements and the location of the new facilities.

Facilities

The proposed project would reduce the current number of classrooms onsite from 28 to 27 classrooms, while maintaining the same student capacity of 683 students. Classrooms would be housed in eight separate buildings. Two buildings would contain the kindergarten and transitional kindergarten classrooms totaling 7,451 square feet (see the buildings labeled "BLDG B" in Figure 5); two buildings would contain first and fifth-grade classrooms totaling 7,367 square feet (see "BLDG C"); three buildings would contain second, third, and fourth-grade classrooms totaling 11,392 square feet (see "BLDG E"); and one additional building consisting of 3,175 square feet would contain sixth-grade classrooms (see "BLDG D"). The total square footage of these classroom buildings would be 29,385 square feet. The site would feature outdoor learning spaces for the classroom buildings. The classroom buildings, in addition to a garden, would be concentrated on the southeastern end of the campus.

The proposed project also includes a 4,973 square-foot multi-purpose room, 5,000 square feet of administration uses, a 1,755-square-foot kitchen, a 1,060-square-foot P.E./After School room, a 763-square-foot food storage area, and a 1,435-square-foot community room totaling 14,986 square feet that would be housed in one building on the western portion of the campus (see "BLDG A"). The campus would also feature an outdoor dining area with access to the multi-purpose room. South of this building would be a 2,287 square-foot-library, a 1,829-square-foot-visual and performing arts space, and a 1,420-square-foot-resource-specialist program space, housed in one building totaling 5,536 square feet (see "BLDG F").

The total building square footage of the proposed campus buildings is 49,907 square feet. This an increase of 6,589 square feet from the existing building square footage of 43,318 square feet. Building exterior façades would consist of stucco, concrete, and punched windows in a storefront system with single-ply and standing seam metal roofs. All proposed buildings would be designed to be all-electric and will include solar panels as required by the 2022 California Building Standards Code (CBC).

Access and Circulation

The school's existing parking lot would be replaced with a larger lot and relocated to the northern portion of the campus, west of the proposed basketball courts and soccer field. A total of 97 parking spaces would be provided at this parking lot, including electric vehicle (EV)-charging stations as required by the 2022 CBC. Access to this parking lot would be provided via two driveways on Steiner Drive. The parking lot would include

a dedicated drop-off zone, in bus drop-off area, and a Kindergarten park-and-walk zone. An additional drop-off zone is also proposed on the eastern edge of campus along Vernace Way. These improvements would reduce circulation and congestion issues by allowing drop-off and pick-up to occur away from the main roadways.

A service entrance on Steiner Drive, adjacent to the building housing the kitchen facilities (BLDG A), would be provided to accommodate kitchen deliveries.

Fencing

As shown in Figure 5, chain link fencing would be installed along the boundary of the powerline easement, around the perimeter of the kindergarten buildings and play area, and at the southern boundary of campus bordering the facility owned by California American Water. Ornamental fencing would be installed along the eastern boundary of Vernace Way, at the front entrance to campus from the new parking lot, and along the western boundary of campus at Steiner Drive. A cement masonry unit (CMU) wall would be constructed at the southern boundary of the campus, along the fence line of the residential uses on Frawley Way.

Recreational Amenities

The proposed recreational facilities include hardcourts located directly north of the classroom buildings, three basketball courts (total of 11,955 SF) adjacent to a soccer field (57,000 SF), and a separate playground for kindergarten classes (12,047 SF) The classrooms would be separated from the hardcourts by landscaping. Access to the soccer field and basketball courts would be provided for community use. However, it is anticipated that the parking lot would not be accessible after school hours unless otherwise permitted by the school beforehand.

Lighting

No lighting is proposed for the field. The school walkways and parking areas would have motion-detected lighting for security and safety purposes. Exterior lights would be designed to meet DSA photometric requirements. Afterschool programming would end by 6:30 PM.

Off-Site Improvements

The proposed project would also consist of improvements to sidewalks and driveway curb cuts, as well as the replacement of underground utility connections, if needed.

1.5.2 Project Phasing

The existing students that would attend Nicholas Elementary School during construction of the new campus would temporarily attend school at the Clayton B. Wire Elementary School, located at 5100 El Paraiso Avenue, approximately half a mile north from Nicholas Elementary School. Construction would last approximately 22 months. Wire Elementary School was closed after the 2012-2013 school year and is currently available for interim use (SCUSD 2022). Figure 6, *Interim School Location,* shows the location of Wire Elementary School.

Busing to Wire Elementary School would be provided via five to six buses for students in the attendance area of Nicholas Elementary School with pick-up tentatively scheduled for 8:30 AM and drop-off at 3:00 PM.

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. Proposed improvements would occur on- and off-site. Construction is proposed to take place between the hours stated in Section 6.68.090, Exemptions, of the County'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.

Construction activities would occur in one phase lasting from August 2023 through June 2025.

The estimated construction phasing and duration is as follows:

- Pre-construction: Demolition, grading, site preparation, parking lot lift, and undergrounding of utilities. August 2023 – November 2023 (3 months)
- New Construction: Building construction, landscaping, off-site improvements. November 2023 – June 2025 (19 months).

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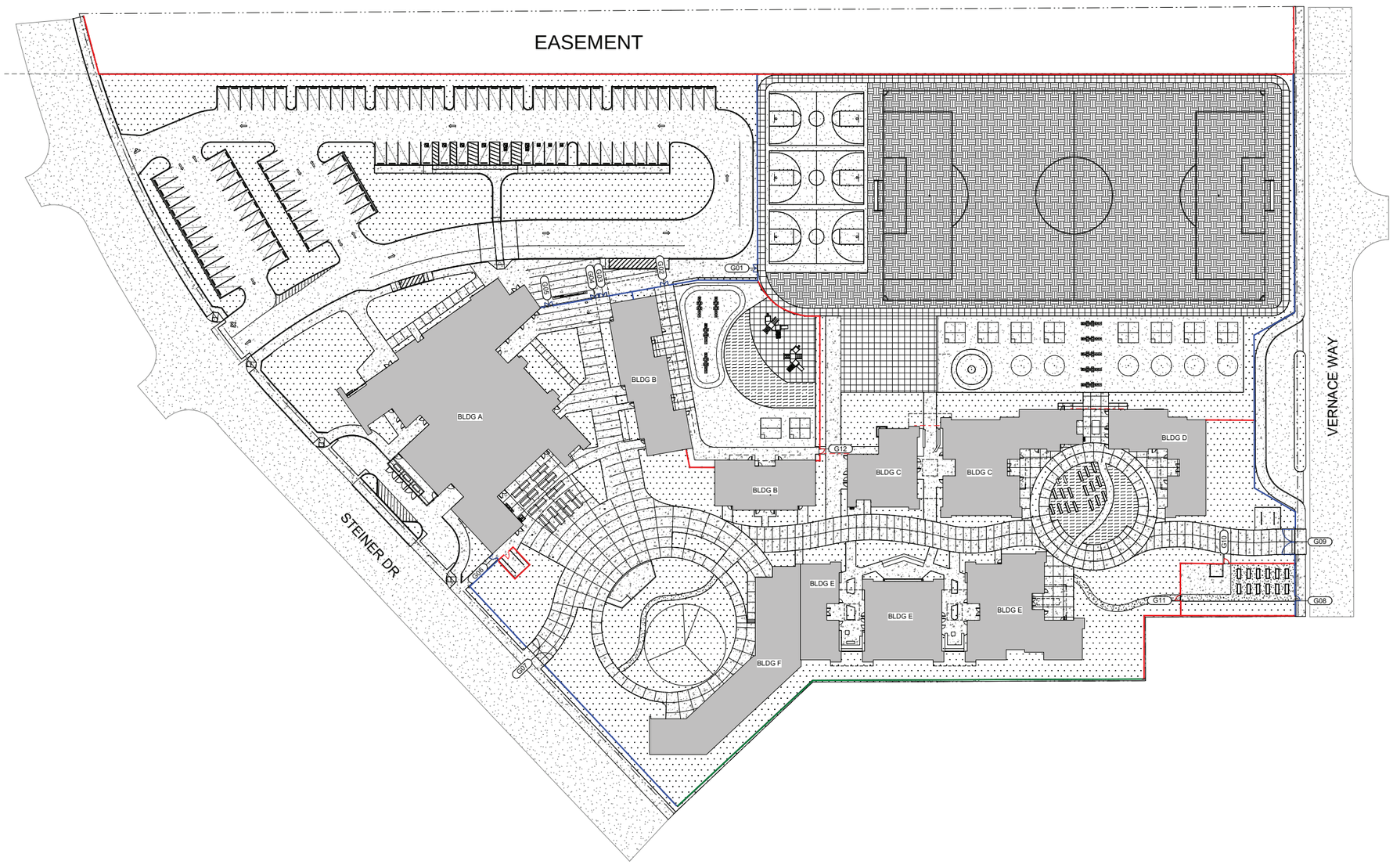
Figure 5 - Conceptual Site Plan



Building Breakdown

Building A – Admin, Community Room, Multipurpose Room

Building B – Transitional Kindergarten & Kindergarten Classrooms

Building C – 1st & 5th Grade Classrooms

Building D – 6th Grade Classroom

Building E – 2nd, 3rd, & 4th Grade Classrooms

Building F – Library, Visual and Performing Arts, and Resource Specialist Program

LEGEND

- APPROXIMATE LIMIT OF WORK. REFER TO ADDITIONAL DRAWINGS FOR WORK WHICH MAY EXTEND BEYOND THIS APPROXIMATE LIMIT OF WORK LINE.
- PROPERTY LINE
- BUILDING FOOTPRINT
- CONCRETE PAVEMENT
- ASPHALT
- LANDSCAPE
- GRASS
- ARTIFICIAL TURF
- DG
- RUBBER
- FIRE LANE
- FIRE HYDRANT - SEE CIVIL DRAWINGS
- CHAIN LINK FENCE
- ORNAMENTAL METAL FENCE
- SLIDING CHAIN LINK GATE
- CMU WALL

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Scale (Feet)

Source: HMC Architects, 2022.

1. Introduction

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Figure 6 - Interim School Location

Nicholas Elementary School Boundary

Clayton B. Wire Elementary School Boundary

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Scale (Feet)

Source: Nearmap,Inc., 2023.

1. Introduction

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2. Environmental Checklist

2.1 PROJECT INFORMATION

1. **Project Title:** Nicholas 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 project site is on the Nicholas Elementary School campus at 6601 Steiner Drive in the community of Parkway in the County of Sacramento, California (APN 039-0133-011-0000).

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

6. **General Plan Designation:** Low Density Residential

7. **Zoning:** Residential Density (RD-5)

8. **Description of Project:**
   The Sacramento City Unified School District plans to fully rebuild the Nicholas Elementary School. The number of classrooms would decrease by one, however, the capacity would remain the same (683 seats). The total square footage of building space would increase by 6,589 square feet. Access to the site would be via driveways on Steiner Drive.

9. **Surrounding Land Uses and Setting:**
   The project site is surrounded by single-family residences to the north, south, east and west of the project site. A church is located to the west of the project site. A facility owned by California American Water is located adjacent to the southeast corner of the project site.

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

- County 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 21082.3(c) contains provisions specific to confidentiality.

Per District policy, the District sent Assembly Bill 52 (AB 52) 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. The Wilton Rancheria Tribe responded, and their recommendations have been incorporated into the IS/MND. See Section 3.18, *Tribal Cultural Resources,* for more information.

2. Environmental Checklist

2.2 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

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

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

2.3 DETERMINATION (TO BE COMPLETED BY THE LEAD AGENCY)

On the basis of this initial evaluation:

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

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

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

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

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

Nathaniel H. Browning — 4/14/2023

Signature — *Date*

2.4 EVALUATION OF ENVIRONMENTAL IMPACTS

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

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

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

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

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

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

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

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

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

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

2. Environmental Checklist

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

9. The explanation of each issue should identify:

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

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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. There are no designated scenic vistas in the vicinity of the project site according to the Sacramento County General Plan and the South Sacramento Area Community Plan. The County General Plan Circulation Element designates a portion of State Route 160 as a scenic highway and the County roads of Isleton Road and River Road as scenic corridors. The project site is not visible from this highway or these roads. The project site is in an urbanized area with flat topography. Views from the site and surrounding properties are limited to the foreground and include dense suburban residential development. 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. The proposed project would have a less than significant impact on scenic vistas.

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), which terminates approximately 4.5 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 portion of the County with development surrounding the site in all directions. The project site currently contains an elementary school and upon project completion, the site would continue to be used as an elementary school. The proposed project is therefore consistent with its RD-5 zoning which includes K-12 public schools as a permitted primary use. The project site is surrounded by residential uses and a church, and there are no scenic resources visible from the campus.

Additionally, 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 exterior façades consisting of stucco, concrete, and punched windows in a storefront system. The roofs would consist of single-ply and standing seam metal. Although the visual qualities of the project site during construction would not appear better than the existing condition of the property, the construction worksite would be temporary. The finished project would include landscaping; new drop-off areas; and new buildings with siding, paint, and windows, and exterior finishes that complement the design and color of the surrounding development.

The current developed areas are concentrated on the northwestern portion of the site while most of the site area contains muti-use fields and other connected lawn areas. The proposed project would reconfigure the campus buildings across the central area of the site, developing a large portion of the site that currently contains the multi-use fields; a new single soccer field would replace the existing field at the northeast portion of the site. 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 consist of cement and stucco exteriors that are not reflective. School walkways and parking areas would have motion-detected lighting for security and safety purposes. 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, and landscaping would surround the site. 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

3. Environmental Analysis

Issues	Potentially Significant Impact	Less Than Significant With Mitigation Incorporated	Less Than Significant Impact	No Impact
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?				X

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 RD-5, which is most widely used for single-family residential zoning. 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 RD-5. 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 and shrubs. 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, Greenhouse Gas Emissions Analysis, and Health Risk Assessment,* PlaceWorks, April 2023

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

The Air Quality section addresses the impacts of the proposed project on ambient air quality and the exposure of people, especially sensitive individuals, to unhealthy 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, Greenhouse Gas Emissions Data, and Health Risk Assessment*.

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 toxic air contaminants (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 propose development consistent with the growth anticipated or development that is less dense that is associated with the Sacramento County 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 regional growth projections.

The proposed project involves the redesign and reconstruction of Nicholas Elementary School. As discussed in Section 3.14, *Population and Housing*, the capacity of the school would remain the same under the rebuild, so the proposed project would not directly increase population growth in the area. The project site is currently designated Low Density Residential, 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 Sacramento County Zoning Ordinance and is permitted under County approval and issuance of a site plan review.

Additionally, based on the scope and nature of the proposed project, it is anticipated to generate fewer than 1,000 new jobs and would develop less than 500,000 square feet of new 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 with Mitigation Incorporated. 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.

3. Environmental Analysis

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, ROGs, 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, ROG, 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 onsite 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 $PM_{2.5}$.

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*, that would reduce impacts related to fugitive dust generated during project construction. Nonetheless, the SMAQMD's current CEQA guidance recommends that the SMAQMD's Basic Construction Emission Control Practices (BMPs) be included as part of a project's Mitigation Monitoring and Reporting Program for the project to be measured against the SMAQMD's non-zero PM significance threshold. Should a project not implement these BMPs, the SMAQMD significance threshold for construction-generated PM would be zero. As such, Mitigation Measure AQ-1 would be required to ensure the SMAQMD's Basic Construction BMPs are incorporated into project construction 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 activities. Analysis of construction emissions is based on the preliminary construction duration 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 buildings and asphalt onsite, site preparation, grading, new building construction, landscaping, and installation of fields and parking lot.

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 District and default equipment mix for each construction phase. Construction is assumed to begin in August 2023 and last until June 2025. All construction activities were modeled under the assumption that no overlap between the activities would occur, consistent with CalEEMod's default construction scheduling.

Potential construction-related air quality impacts are determined by comparing the maximum daily criteria air pollutants emissions generated by project construction to the SMAQMD significance thresholds in Table 2, *Maximum Daily Regional Construction Emissions*. Maximum daily emissions shown therein are based on the highest maximum daily emission rates between Winter and Summer seasonal modeling results. Annual criteria air pollutant emissions generated by project construction are compared against the applicable SMAQMD significance thresholds in Table 3, *Annual Regional Construction Emissions*. As previously mentioned, because the proposed project would be required to implement dust control measures under Mitigation Measure AQ-1, the applicable significance threshold for PM_{10} would be 80 pounds per day and 14.6 tons per year and $PM_{2.5}$ would be 82 pounds per day and 15 tons per year, rather than a significance threshold of zero for all construction-generated PM. It is important to note that the annual significance thresholds for construction only apply to PM_{10} and $PM_{2.5}$. As such, Table 3 is limited to annual emission estimates for PM.

Table 2 Maximum Daily Regional Construction Emissions

Construction Activity	Maximum Daily Criteria Air Pollutants (lbs/day)[1, 2]			
	ROG	NO_X	Total PM_{10}	Total $PM_{2.5}$
Year 2023				
Demolition	2.94	29.13	10.62	2.25
Site Preparation	4.05	40.47	78.56	12.53
Grading	2.11	20.52	42.14	6.07
Building Construction	1.36	12.45	0.84	0.58
Year 2024				
Building Construction	1.31	11.81	0.79	0.53
Year 2025				
Building Construction	1.22	10.96	0.72	0.47
Paving	1.03	7.51	0.5	0.36
Architectural Coating	13.45	0.89	0.07	0.04
Maximum Daily Construction Emissions	13.45	40.47	78.56	12.53
SMAQMD Max. Daily Project-Level Thresholds	NA	85	80	82
Exceeds Max. 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 South Coast AQMD 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. Environmental Analysis

Table 3 Annual Regional Construction Emissions

Construction Activity	Annual Criteria Air Pollutants (tons/year)[1, 2]	
	Total PM_{10}	Total $PM_{2.5}$
Year 2023		
Demolition	0.16	0.04
Site Preparation	0.59	0.09
Grading	0.64	0.09
Building Construction	0.01	0.01
Annual Construction Emissions (tons/year)	1.4	0.23
Year 2024		
Building Construction	0.11	0.07
Annual Construction Emissions (tons/year)	0.11	0.07
Year 2025		
Building Construction	0.02	0.01
Paving	0.01	< 0.005
Architectural Coating	< 0.005	< 0.005
Annual Construction Emissions (tons/year)	0.03	0.01
SMAQMD Annual Project-Level Thresholds	14.6	15
Exceeds Annual Threshold?	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 South Coast AQMD 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.

As shown above in Table 2 and Table 3, criteria air pollutant emissions from construction equipment exhaust would not exceed the SMAQMD maximum daily or annual significance thresholds. In addition, fugitive dust impacts would be reduced by implementation of Mitigation Measure AQ-1. Therefore, impacts from project-related construction activities to the regional air quality would be less than significant with mitigation.

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. The proposed project involves a redesign and reconstruction of Nicholas Elementary School and would result in no change to student capacity. The SMAQMD has adopted operational screening criteria to determine whether new land use development projects would present a potential to exceed SMAQMD significance thresholds (SMAQMD 2018). As the proposed project is the reconstruction of an elementary school, the appropriate SMAQMD screening criteria would be the Educational, Elementary School land use criteria, listed below:

- Ozone Precursor Screening Level: 365,000 square feet, or 4,350 students.
- PM Screening Level: 760,000 square feet, or 9,100 students.

The proposed project would not involve any increase in student enrollment beyond existing conditions. Moreover, the proposed project would constitute the demolition of the existing buildings totaling approximately 43,318 square feet and construction of new buildings totaling approximately 49,907 square feet, for an approximate increase of 6,589 square feet. As both the new student enrollment (0 students) and new building space (6,589 square feet) would be less than the SMAQMD's applicable screening criteria, the proposed project would be considered to generate operational criteria air pollutant and ozone precursor emissions below the SMAQMD significance thresholds. Therefore, impacts to the regional air quality associated with operation of the project would be less than significant.

Mitigation Measures

AQ-1 The project shall implement the following Basic Construction Best Management Practices recommended by the Sacramento Metropolitan Air Quality Management District (SMAQMD). Grading plans for the project shall clearly list these requirements:

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.
- Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1].
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

With implementation of Mitigation Measure AQ-1, the proposed project would implement applicable dust control BMPs to reduce the generation of fugitive dust during project construction. By implementing these BMPs, the proposed project is considered to have a less than significant impact related to construction-generated $PM_{2.5}$ and PM_{10}, as discussed above and illustrated in Table 2 and Table 3.

3. Environmental Analysis

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact with Mitigation Incorporated. 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 the SMAQMD does not currently have adopted CO hotspot screening guidance, guidance from the Bay Area Air Quality Management District (BAAQMD) is utilized herein to determine whether the proposed project may result in potentially significant impacts related to CO hotspot generation. 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 there would be no increase in traffic volumes and as the proposed project would be well below the CEQA VMT threshold of 110 net 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. Most land use development 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 proposed project would elevate concentrations of TACs (i.e., DPM) in the vicinity of sensitive land uses during temporary construction activities that would use offroad equipment operating onsite, and at different levels depending on the type of activity (for example, limited to none during installation of utilities, and more during grading activities). Construction modeling considered years 2023-2025 for the duration of project construction.

The nearest receptor types to the project site are offsite residents surrounding the project site, offsite workers across Steiner Drive at Allegheny Wesleyan Methodist Church, and offsite students at Calvary Christian and Sacramento Accelerated Academy north of the project site across 47th Avenue. A site-specific construction Health Risk Assessment (HRA) of TACs was prepared to quantify potential health risk emissions during project construction (see Appendix A). The results of the analysis are shown in Table 4, *Unmitigated Construction Risk Summary,* and demonstrates that the SMAQMD's significance thresholds could be exceeded without mitigation.

Table 4 Unmitigated Construction Risk Summary

Receptor	Cancer Risk (per million)	Chronic Hazards
Maximum Exposed Receptor – Off-site Resident [1]	28.1	0.025
Maximum Exposed Receptor – Off-site Students [2]	0.2	0.001
Maximum Exposed Receptor – Off-site Workers	0.2	0.005
SMAQMD Threshold	10	1.0
Exceeds Threshold?	Yes	No

Source: Appendix A

[1] In accordance with the latest 2015 OEHHA guidance, the calculated total cancer risk conservatively assumes that the risk for the residential MER consists of a pregnant woman in the third trimester that subsequently gives birth to an infant during the approximately 1.88-year construction period; therefore, calculated risk values were multiplied by a factor of 10.

[2] The calculated risk values for the students were multiplied by a factor of 3.

As illustrated in Table 4, the proposed project would exceed the cancer risk significance threshold of 10 in one million for the maximum exposed off-site residential receptor at an estimated 28.1 per one million. As shown in Table 4, none of the other nearby receptors would experience a cancer risk that exceeds SMAQMD significance thresholds and none of the identified nearby receptors would experience a chronic hazard that exceeds SMAQMD significance thresholds during project construction. Because off-site residential receptors could experience a cancer risk greater than the SMAQMD's significance threshold, Mitigation Measure AQ-2 would be required to ensure that project construction utilizes Tier 4 Interim engines for equipment greater than 50 horsepower to reduce the localized concentrations of DPM. The mitigated HRA results specifically for maximum exposed off-site residential receptor, which incorporate implementation of Mitigation Measure AQ-2, are presented in Table 5, *Mitigated Construction Risk Summary*.

3. Environmental Analysis

Table 5 Mitigated Construction Risk Summary[1]

Receptor	Cancer Risk (per million)	Chronic Hazards
Maximum Exposed Receptor – Off-site Resident [2]	5.7	0.005
SMAQMD Threshold	10	1.0
Exceeds Threshold?	No	No

Source: Appendix A

[1] Modeling includes Mitigation Measure AQ-2, which requires the use of Tier 4 Interim engines for construction equipment greater than 50 horsepower.

[2] In accordance with the latest 2015 OEHHA guidance, the calculated total cancer risk conservatively assumes that the risk for the residential MER consists of a pregnant woman in the third trimester that subsequently gives birth to an infant during the approximately 1.88-year construction period; therefore, calculated risk values were multiplied by a factor of 10.

As shown in Table 5, implementation of Mitigation Measure AQ-2 would reduce cancer risk impacts at the maximum exposed off-site residential receptor from 28.1 in one million to 5.7 in one million, below the SMAQMD's significance threshold.

Because cancer risks for all nearby receptor types would be below SMAQMD significance thresholds after mitigation, construction activities associated with the proposed project are less than significant with mitigation.

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 $PM_{2.5}$, ROG, 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 1.0 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 0.068 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 0.30 incidence, or 0.002 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 2.1 incidence, or 0.005 percent of the total 44,766 incidences for this category in the Five-Air-District Region.

Estimated health effects related to ROG 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 0.38 incidence, or 0.007 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 0.005 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 0.068 incidence, or <0.001 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 0.044 incidence, or <0.001 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 $PM_{2.5}$, ROG, 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 K-12 schools.

The proposed project involves the demolition and reconstruction of the Nicholas Elementary School campus facilities. 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 of the project site.[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.

[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.

Mitigation Measures

AQ-2 Construction contractors shall, at minimum, use equipment that meet the United States Environmental Protection Agency's (EPA) Tier 4 Interim emissions standards for off-road diesel-powered construction equipment of 50 horsepower, unless it can be demonstrated to the Sacramento Unified School District that such equipment is not commercially available. For purposes of this mitigation measure, "commercially available" shall mean the availability of Tier 4 Interim engines similar to the availability for other large-scale construction projects in the city occurring at the same time and taking into consideration factors such as (i) potential significant delays to critical-path timing of construction and (ii) geographic proximity to the project site of Tier 4 Interim equipment. Where such equipment is not commercially available, as demonstrated by the construction contractor, Tier 3 equipment retrofitted with a California Air Resources Board's Level 3 Verified Diesel Emissions Control Strategy (VDECS) shall be used. This requirement shall apply to all activities (e.g., foundation, pile driving, vertical construction) related to construction of the proposed project.

In addition, the following shall also be completed:

- Prior to construction, the project engineer shall ensure that all construction (e.g., grading and building) plans clearly show the requirement for EPA Tier 4 Interim emissions standards for construction equipment of 50 horsepower or more.
- The construction equipment list shall state the makes, models, Equipment Identification Numbers, Engine Family Numbers, and number of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations.
- To the extent that equipment is available and cost-effective, contractors shall use electric, hybrid, or alternate-fueled off-road construction equipment.
- Contractors shall use electric construction tools, such as saws, drills, and compressors, where grid electricity is available.
- Construction contractors shall ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9.

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 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 offsite 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 Nicholas Elementary School Replacement Project*, ECORP Consulting, Inc., February 21, 2023

A complete copy of the search results 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**

3. Environmental Analysis

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 County. The project site is surrounded by residential uses to the north, south, east and west, in addition to a church to the east. 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.

An Arborist Report was prepared for the project site to identify, map, and assess the general condition of all trees on the project site (ECORP 2023). The report inventoried a total of 73 trees that are considered "Protected Trees" under the County's guidelines. This included 13 Chinese privet (*Ligustrum sinense*), ten Chinese pistache (*Pistacia chinensis*), seven California sycamore, four Chinese hackberry (Celtis sinensis), four crepe myrtle (*Lagerstroemia indica*), three incense cedar (*Calocedrus decurrens*), three camphor tree (*Cinnamomum camphora*), three mulberry (Morus sp.), three Callery pear (*Pyrus calleryana*), three wild plum (*Prunus americana*), three zelkova (*Zelkova sp.*), two fig (*Ficus carica*), two oleander (*Nerium oleander*), one pineapple guava (*Acca sellowiana*), one Japanese maple (*Acer palmatum*), one Judas tree (*Cercis siliquastrum*), one citrus (*Citrus sp.*), one English walnut (*Juglans regia*), one liquidambar (*Liquidambar styraciflua*), one European olive (*Olea europaea*), one date palm (*Phoenix dactylifera*), one cherry (*Prunus sp.*), one valley oak, one red oak (*Quercus rubra*), one interior live oak, one Mexican fan palm (*Washingtonia robusta*) (ECORP 2023).

The proposed project would remove 58 trees. Of the 58 trees proposed for removal, seven have a high biological value, 19 have a moderate biological value, and 32 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 2:1 ratio or higher. In the event that trees are transplanted from the project site, it is recommended that transplanting occur during the dormant season (November through February) and that citrus trees are replanted in soils that match the pH of their current location. While none of the trees found in

the project site 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 have been identified onsite (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, 73 trees were inventoried on the project site; 58 of these trees would be removed from the project site during construction (ECORP 2023). Nine of the inventoried trees (tag numbers 15, 959, 960, 964, 970, and 984 through 987; see Figure 7, *Arborist Survey Results*) are considered County trees under the County Guidelines.

Based on the limits of work, 58 of the 73 trees found during the inventory are proposed for removal. The remaining 15 trees have trunks located on private property or are proposed for protection (Tree 964, which is

a heritage tree) and would have indirect impacts, which means that there would be impacts at the soil level within the Protected Zone of the tree through ground-disturbance (ECORP 2023). Of the 58 trees proposed for removal, seven have high biological value, 19 have a moderate biological value, and 32 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 2:1 ratio or higher. In the event that trees are transplanted from the project site, it is recommended that transplanting occur during the dormant season (November through February) and that citrus trees are replanted in soils that match the pH of their current location.

While the provisions of the County's Tree Preservation Code (Section 19.12.130, Development Control Measures and Section 19.12.160, Grading Beneath Tree Driplines) do not apply to the District's property, they provide standards for protection and replacement of trees on County and private property. The District has chosen to follow these standards by implementing Mitigation Measure BIO-1 and Mitigation Measure BIO-2 to ensure no potentially significant impacts to the heritage tree (tag #964) would occur.

Mitigation Measures

BIO-1 The project shall implement the following development standards for tree number 964 during construction activities:

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

BIO-2 The project shall implement the following development standards for tree number 964 during grading activities:

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

- 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?

No Impact. The project site is located within the Urban Development Area of the South Sacramento Habitat Conservation Plan (SSHCP). However, school districts are not subject to the regulatory authority of a local Land Use Authority Permittee (Sacramento County 2018). Additionally, the project site is currently developed, and the proposed project would redevelop the site with the same uses; the project site is surrounded by urban uses. Therefore, the proposed project would not be required to comply with the measures of the SSCHP, and no impact would occur.

3. Environmental Analysis

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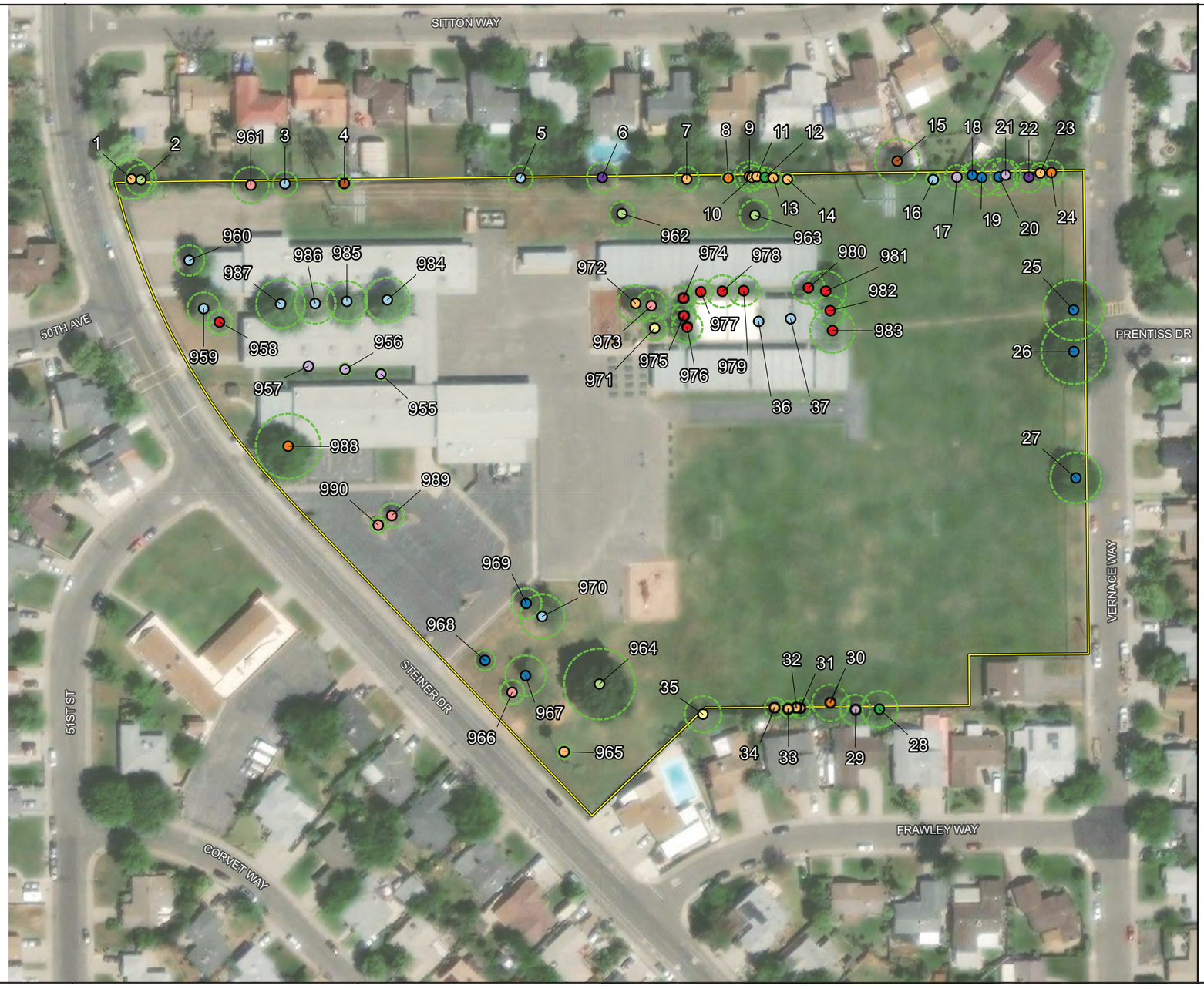
Figure 7 - Arborist Survey Results



Map Contents

- Study Area - 9.90 ac.
- Tree Protection Zone

Tree Species (Quantity)

- California Sycamore (7)
- Callery Pear (3)
- Camphor Tree (3)
- Cherry (1)
- Chinese Hackberry (4)
- Chinese Pistache (10)
- Chinese Privet (13)
- Citrus (1)
- Crepe Myrtle (4)
- Date Palm (1)
- English Walnut (1)
- European Olive (1)
- Fig (2)
- Incense Cedar (3)
- Interior Live Oak (1)
- Japanese Maple (1)
- Judas Tree (1)
- Liquidambar (1)
- Mexican Fan Palm (1)
- Mulberry (3)
- Oleander (2)
- Pineapple Guava (1)
- Red Oak (1)
- Valley Oak (1)
- Wild Plum (3)
- Zelkova (3)

0 115
Scale (Feet)

Source: ECORP Consulting, Inc., 2023

3. Environmental Analysis

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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:

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

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

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

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

The project site contains Nicholas Elementary School, which opened in 1962. 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 the off-site improvements (sidewalks, curb cuts, utility undergrounding). 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. As shown in Figure 12 of the Sacramento County General Plan Conservation Element Background Report, the project site is not located within an area of moderate or high sensitivity for prehistoric cultural

resources (Sacramento County 1993a). Although the project site is already developed, potential buried resources could be unearthed during ground disturbing activities. 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 preferred contact for 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 existing Nicholas 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 nonessential 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 (i.e., restrictions on equipment, labor, types of activities, etc.). The proposed utility infrastructure would connect to the existing water, sewer, storm drain system, 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

Operational use of energy associated with the proposed project would include heating, cooling, and ventilation of buildings; water heating; operation of electrical systems and use of onsite equipment and appliances;

transportation by staff, students, and parents driving to and from the school; and indoor, outdoor, perimeter, and parking lot lighting.

Electrical Energy

The proposed project involves the redesign and reconstruction of an existing elementary school. Electrical service to the proposed project would be provided by SMUD connections to existing offsite electrical lines and new onsite infrastructure.

While the proposed project would result in approximately 6,589 square feet more building space than existing conditions onsite, the entire 49,907 square feet of building space would be constructed compliant with the current Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen). New and replacement building space 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, and the proposed project would be required to include photovoltaic (PV) systems, consistent with the 2022 California Building Standards Code. 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 in natural gas consumption since the campus would encompass only All-Electric buildings onsite. Therefore, no natural gas would be consumed as part of the proposed buildings' operation.

Transportation Energy

The proposed project is not anticipated to increase student or 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. The two existing midblock driveways on Steiner Drive would be replaced with two driveways on Steiner Drive that align with 50th Avenue and 51st Street. The new, larger parking lot would also provide a student drop-off/pick-up zone and a short-term parking area for kindergarten parents. These activities currently occur at on-street curb areas. In addition, a bus loading/unloading area would be provided in the new parking lot and a separate onsite bus loading/unloading area is being considered on the east side of the school campus adjacent to Vernace Way. 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 applicable 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?

Less Than Significant 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 (CARB 2023).

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	
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 potentially active fault is the Dunnigan Hills Fault located approximately 26.7 miles northwest of the site. According to the California Geologic Survey's Earthquake Shaking Potential for California Map, Sacramento experiences lower levels of shaking less frequently than most areas of California (CGS 2016). 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 County (Sacramento County 2021a). However, based on a review of the Sacramento County General Plan, the vicinity of the project site may have some liquefaction potential. Since the project is a proposed 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) 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 zone and is not within a mapped hazard zone (CDC 2022c). 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 site has a low potential for expansive soils based on its soil type association, the San Joaquin association (USDA 2018). All structures built onsite would adhere to the 2022 CBC, or the 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 the buildings are 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 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, Greenhouse Gas Emissions Analysis, and Health Risk Assessment*, PlaceWorks, April 2023

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

Existing Conditions

The existing elementary school generates 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 emissions is fossil fuel use. The Intergovernmental Panel on Climate Change (IPCC) has identified four major GHGs—water vapor, carbon dioxide (CO_2), methane (CH_4), and ozone (O_3)—that are the likely cause of an increase in global average temperatures observed within the 20th and 21st centuries. Other

GHG identified by the IPCC that contribute to global warming to a lesser extent include nitrous oxide (N2O), sulfur hexafluoride (SF6), 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		
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 6, *Project-Related Construction GHG Emissions*. Implementation of the proposed project would result in the demolition and reconstruction of an existing elementary school. The proposed elementary school buildings square footage would increase by 6,589 square feet when compared to the existing building square footage. As such, there may be a net increase in area sources (e.g., consumer cleaning products) and energy usage (i.e., electricity). However, the proposed project would not result in an increase in student capacity and therefore would not result in an increase of mobile emissions. While building square footage would increase when compared to the existing structures onsite, the new buildings would be designed to be All-Electric and would be compliant with the current California Building Standards Code and, thus, would be more energy-efficient in comparison to the existing structures. Therefore,

[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.

the energy consumption per square foot of building space under the proposed project is expected to be less than that of the existing structures onsite.

Impacts During Construction

The SMAQMD has adopted a construction GHG significance threshold of 1,100 metric tons of carbon dioxide ($MTCO_2e$) per year. Should a land use development project exceed this amount of GHG emissions in a given year, it would present a potentially significant impact warranting mitigation. As shown in Table 6, construction of the proposed project would not generate annual GHG emissions that would exceed the SMAQMD threshold of 1,100 $MTCO_2e$ per year.

Table 6 Project-Related Construction GHG Emissions

Source	GHG Emissions
	$MTCO_2e$ Per Year
Construction	
Year 2023	192
Year 2024	344
Year 2025	104
Annual Maximum	344
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

Long-Term Impacts During Operation

The SMAQMD has adopted a GHG significance threshold for GHG emissions from operation of a project, which is 1,100 $MTCO_2e$ per year with implementation of best management practices (BMPs) for GHG emissions. To assess a project's potential to exceed the 1,100 $MTCO_2e$ per year significance threshold, the SMAQMD has adopted operational screening criteria to qualitatively assess a project's potential GHG emissions impacts (SMAQMD 2018). As the proposed project is the reconstruction of an elementary school, the appropriate SMAQMD screening criteria would be the Educational, Elementary School land use criteria, listed below:

- GHG Screening Level: 57,000 square feet, or 676 students.

The proposed project would not involve any increase in student enrollment beyond existing conditions. Moreover, the proposed project would constitute the demolition of the existing buildings totaling approximately 43,318 square feet and construction of new buildings totaling approximately 49,907 square feet, for an approximate increase of 6,589 square feet. As both the new student enrollment (0 students) and new building space (6,589 square feet) would be less than the SMAQMD's applicable screening criteria, the proposed project would be considered to generate operational GHG emissions below the SMAQMD significance threshold of 1,100 $MTCO_2e$ per year.

In addition to the above significance threshold, the SMAQMD has two BMPs that must be included in the project for impacts to be determined less than significant:

- Require all buildings to use all electric energy systems, and
- Include parking stalls with electric vehicle (EV) charging infrastructure consistent with the requirements of the applicable California Green Building Standards Code (CALGreen) Tier 2 nonresidential measures.

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).

The proposed project, by design, would satisfy the first BMP of an All-Electric building design but would not be designed to implement the second required BMP of including EV charging infrastructure consistent with the current CALGreen Tier 2 nonresidential measures. 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 to ensure the proposed project incorporates EV charging infrastructure consistent with the current CALGreen Tier 2 nonresidential measures.

Mitigation Measures

GHG-1 The project shall comply with the applicable 2022 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 2022 CALGreen Tier 2 standards.

With implementation of Mitigation Measure GHG-1, the proposed project would be required to install the applicable number of EV parking 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 SACOG's 2020 MTP/SCS. 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, the required SMAQMD GHG BMPs, which the proposed project would either include by design or is required to incorporate by Mitigation Measure GHG-1, go beyond the requirements of the current CALGreen and Building Energy Efficiency Standards in effect at the time when applying for building permits. 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:

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. 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, impacts with respect to the transport, use and disposal of hazardous materials would be less than significant impact.

According to information provided by the SMUD, there is one 69 kV double-circuit overhead transmission line and one 230 kV double-circuit transmission line immediately north of the existing school within a 100-foot-wide easement that extends approximately 50 feet onto the school property. While the health risks associated with electromagnetic field (EMF) exposure remain undetermined, the CDE has decided to employ the precautionary principle and limit exposure to EMF for students and staff at California schools. As such, California Code of Regulations (CCR), Title 5, Section 14010(C) specifies a distance setback requirement of 150 feet from 200-230 kV overhead power transmission lines for proposed school sites if limited activity uses would occur within the area (e.g., parking lots, landscaping, etc.). However, per CDE policy, modernization projects or new construction at existing school sites do not trigger Title 5 EMF setback requirements; though the District must certify that they are not creating or significantly exacerbating an existing safety hazard related to transmission lines.

As described in Section, 1.5.1, *Proposed Land Use,* all proposed buildings would be set back approximately 150 feet from the easement boundary and approximately 175 feet from the nearest 230 kV transmission line. Under the proposed site plan, portions of the norther parking lot, basketball courts, and soccer field would be within the 150-foot setback area, while all proposed buildings (i.e., unlimited activity uses) would be outside of the setback area.

Under the CDE Power Line Setback Exemption Guidance Policy, parking lots are considered 'limited activity uses' because exposure to EMF would be limited in duration. Playfields are considered 'unrestricted uses' under the CDE Guidance but because the proposed basketball and soccer field are similar to the existing uses in this portion of the site, safety hazards related to the high voltage transmission lines would not be exacerbated by the proposed project. As such, impacts with regard to EMF exposure from the existing transmission lines would be less than significant.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. 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.

Based on a review of historical aerial photographs, the project site was utilized for agricultural purposes (grass crops) from at least 1947 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. The District would comply with any requirements the Department of Toxic Substances Control (DTSC) recommends 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 EnviroStor or GeoTracker (DTSC 2022; SWRCB 2022). 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?

No Impact. The project site is not within two miles of a public use airport; the project site is approximately 2.1 miles east of the Sacramento Executive airport (Airnav 2023). Therefore, no impacts would occur.

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[3] and DSA would be required to approve fire access around the site. As part of the DSA process, a Fire and Life Safety Review

[3] The project site is within the Pacific Fruitridge Fire Protection District which contracts services from the City of Sacramento Fire Department.

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 up to 10.1 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, including 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. The proposed project would include pervious and impervious surfaces on-site. The use of BMPs and compliance with local, state, and federal regulations would ensure that drainage patterns and stormwater runoff are maintained. Therefore, a less than significant impact would occur.

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 the 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. The proposed project would take place within the footprint of the project site, which is within Zone X, Areas with Reduced Flood Risk Due to Levee (Flood Insurance Rate Map ID #06067C0190H) (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. Based on maps from the Office of Emergency Services, the site is within dam inundation zone for the Folsom Dam (OES 2015). Folsom Dam is located approximately 21 miles northeast of the project site. As such, a Dam Inundation Study is recommended for the 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 approximately 82 miles east of the Pacific Ocean; therefore, the likelihood of a tsunami impacting the project site is low. No impacts 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.

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 a church. The proposed project consists of demolishing and rebuilding school buildings within the project site; adding an additional drop-off zone on the east portion of the site on Vernace Way; and additional off-site improvements, driveways curb-cuts, sidewalks, and replacement of underground utility connections. Therefore, the proposed project would not divide an established community. 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 RD-5 and the existing land use designation is Low Density Residential. Under the RD-5 zone, public educational facilities for grades K-12 are a permitted primary use. 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 2018). 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. According to the Sacramento County Conservation Element, the project site does not overlie any significant mineral deposits, as shown in Figures 1 and 3 in the Conservation Element (Sacramento County 1993b). Furthermore, 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 on pare on the following:

- *Noise Analysis*, PlaceWorks, March 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, federal, state, and local 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.

3. Environmental Analysis

Environmental Setting

Existing Noise Environment

The proposed project is an existing school, Nicholas Elementary School, at 6601 Steiner Drive in the unincorporated area in Sacramento County. The project site is in a predominantly residential area with a noise environment influenced primarily by transportation noise from local roadways, and State Route 99 approximately 0.66 mile to the west. Noise from nearby residential uses (e.g., property maintenance and vehicle noise) also contribute to the total noise environment intermittently in the project vicinity.

The City of Sacramento 2035 General Plan's Noise Element includes projected future traffic noise contours to assess the noise and land use compatibility of a project site (which also includes contour distances that expand into the unincorporated areas of Sacramento, including the project site). According to the projected future traffic noise contour table in the City's General Plan, the project site is within the future 65 dBA CNEL contour for roadway noise from the State Route 99 Freeway, which is acceptable under the County's exterior standards for schools. The school's outdoor recreation areas and sports fields are also outside of the 65 dBA CNEL noise contour from all surrounding roadways (Sacramento 2015).

Sensitive Receptors

The closest sensitive receptors are the residences adjacent to the north and south project site boundary. The Cedar Creek Inn is located approximately 325 feet northwest of the project. The Allegheny Wesleyan Methodist Church is located approximately 65 feet west of the site across Steiner Drive. The closest residences to the project site are single-family homes approximately 5 feet south along Frawley Way.

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.

Sacramento County General Plan Noise Standards

Exterior Noise Standards

The County has developed policies related to noise and land use compatibly based on Federal and State exterior noise abatement criteria. The proposed project is the redevelopment of an existing school, and the Sacramento County General Plan finds an exterior noise level of 65 dBA CNEL/L_{dn} to be acceptable for schools and churches, and single-family residences as shown in Table 1 in the General Plan (Sacramento County 2022).

Sacramento County Municipal Code Noise Ordinance

Exterior Noise Standards

The Sacramento County Municipal Code includes noise regulations in Title 6 – Health and Sanitation, Chapter 6.68 – Noise Control (referred to generally as the Noise Ordinance). Of the regulations in Chapter 6.68, not all are applicable to the proposed project. The following regulations would apply to the proposed project:

Section 6.68.070 sets standards for cumulative exterior noise levels at residential properties, including exterior noise standards of 55 dBA from 7:00 AM. to 10:00 PM, and 50 dBA from 10:00 PM. to 7:00 AM. (This can also be found in the Sacramento County General Plan Noise Element under Table 2). Per Section 8.68.070(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}).

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.

3. Environmental Analysis

Exemptions

Section 8.68.090 exempts certain activities from Chapter 8.68, including "provides that noise sources associated with construction, repair, remodeling, demolition, paving or grading of any real property, are exempt from maximum noise level requirements, provided said activities do not take place between the hours of 8 PM and 6 AM on weekdays and Friday commencing at 8 PM through and including 7 AM on Saturday; Saturdays commencing at 8 PM through and including 7 AM on the next following Sunday and on each Sunday after the hour of 8 PM." Section 8.68.090 also exempts any activities conducted on parks, public playgrounds and school grounds, provided such parks, playgrounds and school grounds are owned and operated by a public entity or private school. Which would therefore exempt many new/existing noise sources within the project site, however, they are still analyzed below to show they do not cause an exceedance from the County's exterior noise standards at nearby land uses.

Federal Transit Administration

The County 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**		
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 22 months. Construction equipment for the proposed project would include equipment such as concrete saws, excavators, dozers, tractors, loaders, graders, generators, forklifts, 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 on off-site roadways leading to the project site and (2) stationary-source noise from use of construction equipment on the Project site.

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 lasting less than a few minutes.

Worker and vendor trips would total a maximum of 36 trips and up to 18 one-way truck trips would occur during the Site Preparation phase over a 15-workday period. Based on the latest student enrollment for the year 2021 to 2022, approximately 541 students attend the school. Therefore, when accounting each student enrolled as a single trip generated and integrating the worker, vendor, and haul trips into "existing trips", the additional 54 daily trips from construction activity would result in a noise increase less than 0.4 dBA CNEL over existing conditions. As stated before, existing conditions only encompasses trips from student attendance and not from the nearby residences within the neighborhood. Therefore, impacts from construction trips would be much lower than estimated above if trip data was available for the adjacent local roadways. Nonetheless, at 0.4 dBA CNEL, the increase would be 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 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 period, 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 (Lmax) at 50 feet. However, overall noise emissions vary considerably, depending on the specific activity

performed at any given moment, with the acoustical usage factor (AUF) included for each equipment. 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 (from a point source, 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 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	Residences to the South	Wesleyan Methodist Church to the West
Distance in feet	50	295	465	220	340
Demolition	85	69	65	72	68
Site Prep	83	67	63	70	66
Grading	85	69	65	72	68
Distance in feet	50	210	125	25	100
Building Construction	85	73	77	91	79
Architectural Coating	74	61	66	80	68
Distance in feet	50	145	65	205	80
Paving	84	74	81	71	79
Maximum dBA L_{eq}		74	81	91	79
Exceeds 80 dBA L_{eq} Threshold?		No	Yes	Yes	No

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

Off-Campus Receptors

Construction is proposed to take place during the municipal code allowable hours, as stated in Section 6.68.090 of the County Municipal Code. However, as shown in Table 7, on average noise levels would not exceed the

FTA threshold of 80 dBA L_{eq} at the nearest sensitive receptors, except for residences to the south and to the east during building construction and paving respectively. This exceedance would result in a potentially significant.

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. Furthermore, a temporary sound barrier would be required along the southern project site boundary. A sound barrier with sufficient height to block the direct line-of-sight between the noise source and the receiver would provide at least a 5 dBA reduction. As a rule of thumb, any material weighing 20 kg/m^2 (4 lbs/ft^2) or more has a transmission loss of at least 20 dB(A). Such material would be adequate for a noise reduction of at least 10 dB(A) due to diffraction. Note that a weight of 20 kg/m^2 (4 lbs/ft^2) can be attained by lighter and thicker, or heavier and thinner materials. The greater the density of the material, the thinner the material may be. Transmission loss also depends on the stiffness of the barrier material and frequency of the source (FHWA 2017). Therefore, with a 10-foot-high temporary sound barrier along the southern project site boundary constructed with materials which would result in a minimum reduction of 10 dBA when in direct line of site or 5 dBA due to diffraction along the edges of the sound barrier, construction noise for residences adjacent to the southern project site boundary would be below the 80 dBA L_{eq} FTA construction noise threshold. Therefore, reducing noise levels from the highest noise level produced of 91 dBA to be as low as 75 dBA L_{eq} or up to 80 dBA L_{eq} when considering noise diffraction. Thus, noise levels would be at or below the FTA criteria for temporary construction noise of 80 dBA L_{eq}.

Mitigation Measures

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

- Limit construction to the hours that are allowed by Sacramento County, per Section 6.68.090 of the County Municipal Code.
- 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 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 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 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.
- Implementation of a temporary sound barrier along the southern project site boundary adjacent to the single-family residences which would be required to achieve at least a direct line of sight reduction of 10 dBA and is at least 10 feet high.

On-Campus Receptors - Interim Relocation to Clayton B. Wire Elementary School

Students would be temporarily relocated to a currently closed Clayton B. Wire Elementary School approximately 0.28-mile north of the proposed project., while redevelopment of the school occurs. Therefore, construction noise would not impact students or faculty. However, it would increase the traffic noise for

sensitive receptors that surround Clayton B. Wire Elementary School. The District, however, has implemented a program to incorporate up to six temporary school busses which would be used to allow parents to drop students off at Nicholas Elementary School and for the District to then use those busses to transport the students to the interim school. Therefore, reducing the trips produced and reducing the effect of the increase in traffic noise to the sensitive receptors surrounding the interim school. Thus, impacts to the students and surrounding residences at Clayton B. Wire Elementary School would be less than significant.

Operational Noise

Traffic Noise

With the planned school remodel, the proposed project would not result in an increase in students. Additionally, the proposed project would result in a dedicated pickup/dropoff lane within the project site boundary. Therefore, reducing the noise levels at the nearby sensitive receptors by reducing the number of curbside pickups and drop-offs and increasing the distance from said receptors with the dedicated lane being located within the project site. Additionally, pickups and drop-offs with the proposed project would be allowed to occur on either the eastern or western end of the project, whereas previously, pickups and drop-offs only occurred on the western end of the project site. By allowing pickups and drop-offs on both the eastern and western end of the proposed project, the traffic strain from pickup and drop-off, which was primarily occurring to the west would be displaced to the east and the west. Thereby reducing noise levels at the western project site boundary from this activity. The increase in traffic noise level due to pickup and drop-off on the eastern project site over the existing condition would be small and less than 3 dBA (i.e., it takes doubling of the traffic volume to generate a 3 dBA increase in traffic noise). 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 Noise

Heating, ventilation, and air conditioning (HVAC) systems would be installed on the roof of the proposed building. The nearest sensitive receptor property line to the proposed school building is approximately 13 feet to the south. Typical HVAC equipment generates noise levels ranging up to 52 dBA L_{eq} at distance of 50 feet (Berger 2015). At 35 feet from the center of the nearest proposed building to the nearest sensitive receptor boundary to the south, noise levels would attenuate to at 55 dBA L_{eq} or less at distances greater than 35 feet. Therefore, noise from the new HVAC equipment on the proposed buildings to the nearest sensitive receptors would be below the Sacramento County exterior noise standards as set in the municipal code in section 8.68.070 for residential land uses for the daytime criteria of 55 dBA. Therefore, mechanical equipment noise would be less than significant.

Public Address System (PA)

The school remodel intends to integrate PA system(s) within the project site boundary. At the time of creating this document, specifications or placement of the PA system(s) were unknown and not provided to Placeworks. Typically, school PA systems can be varied with small PA systems located in classrooms, medium PA systems on the outside of select buildings (or inside buildings in hallways and corridors that lead to classrooms), and either a single or multiple large PA systems (typically located in the front of the school or in the center) to be heard sitewide where a small or medium PA system would not be heard or present. However, a typical school

3. Environmental Analysis

PA system generates a sound power level (PWL) of 90 to 96 dBA, at a reference distance of one foot. At a distance of 50 feet, the sound pressure level (SPL) perceived by a receiver will be attenuated to 56 to 62 dBA. The school PA system would direct the speakers inwards towards the school site and away from the adjacent residences. Directional reduction of the PA system would further reduce the sound by 3 to 5 dBA. The nearest school building façade facing inwards within the project site, and is also the closest to a sensitive receptor, is Building F, which is approximately located 50 feet north from the exterior of the residences south of the project site boundary. Assuming the worst-case scenario of the PA system being on the louder end of 96 dBA at 1 foot, therefore, 62 dBA at 50 feet, noise generated from the PA system would be louder than the Sacramento County exterior noise standards for residential land uses for the daytime criteria of 55 dBA. However, as stated previously since PA systems are directional a reduction of 3 to 5 dBA would occur, which would reduce noise levels from 62 dBA to 59 dBA by conservatively applying a 3 dB reduction. Furthermore, installation of school PA systems are typically installed somewhere along the building façade, therefore, the façade of the school building becomes a permanent sound barrier to the opposite end of the PA system. Thus, when assuming the lowest reduction a sound barrier provides, which is 5 dB, the PA system would be reduced from 59 dBA to 54 dBA or more. Finally, PA systems would usually be used very sparingly throughout the day (e.g., morning announcements, requesting students to come to the office, etc.) which would not last longer than 5 minutes at most, at a single time. Section 8.68.070 sets standards for cumulative exterior noise levels at residential properties, including exterior noise standards of 55 dBA from 7:00 AM to 10:00 PM, and 50 dBA from 10:00 PM to 7:00 AM. Per Section 8.68.070(b), the allowable decibel increase above the exterior noise standards in any one hour would be adjusted by 10 dBA if the sound lasts less than 5 minutes in any hour during the daytime hours. The adjusted noise threshold would then be (55 + 10 = 65 dBA). Thus, sound from the proposed school PA system wouldn't affect the nearby sensitive receptors for long periods of time, but rather in short instantaneous periods within the hour. Under those given circumstances noise produced from the PA system would be less than significant and no mitigation would be required as it would be below the Sacramento County exterior 55 dBA daytime criteria for the nearest residences.

Student Recreational Noise

As shown in in Figure 5, the school campus outdoor amenities would include a garden, natural turf and seating areas, walkways, hardcourts, and a soccer field. Abutting the southern end of the main building would be the garden. A natural turf soccer field would be provided along the northeastern boundary of the campus. Abutting the southern and western ends of the soccer field would be hard courts. The primary noise source associated with the exterior uses of the proposed school would be from students playing at the hardcourts and playfields during the daytime hours (no nighttime lighting or amplified equipment is proposed, however the playfield and certain areas of the school would remain open until 6:30 PM for after hour school activities).

These additions and reconfigurations could change the existing noise environment during outdoor student recreation activities. The reconfiguration of the existing elementary playgrounds and hardcourts to be relocated within 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 either at the same distance or 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 recreational noise levels at nearby sensitive receptors to the northeast of the project site. 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 is around 54 dBA L_{50} (which means half of the time sound from the soccer field exceeds this sound level and half of the time it is below this sound level). The nearest sensitive receptor to the proposed soccer field would be located approximately 65 feet to the north, adjacent to the northern project site boundary. At that distance, noise from the proposed soccer field would attenuate to 42 dBA L_{50}. Therefore, noise from the new soccer field to the nearest residence would be below the Sacramento County exterior noise standards as set in the municipal code in section 8.68.070 for residential land uses for both day and nighttime criteria (55 and 50 dBA L_{50} respectively). Therefore, recreational noise would be less than significant.

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

Less Than Significant Impact with Mitigation Incorporated.

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 worst-case scenario of vibration levels, distances to the nearest sensitive receptor buildings are measured from the closest distances the equipment below might occur to the sensitive receptor. As a result, the north, east, and west calculations were done from the project site boundary. However, the distance to the south receptor was measured from the edge of the southern playground (as that is where demolition and paving would occur for the proposed project). For vibration annoyance, the FTA vibration level limit of 72 VdB will apply to the surrounding residential receptors as well as to the Church.

Table 8, *Worst-Case 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 potentially exceed 72 VdB at any nearby sensitive receptors. Therefore, impacts related to construction vibration annoyance would be potentially significant. However, with the implementation of Mitigation Measure N-2, these results would be reduced to less than significant.

3. Environmental Analysis

Table 8 Worst-Case Annoyance Vibration Levels from Construction Equipment

Equipment	Vibration Levels (VdB)				
	Reference Levels at 25 feet	Residences to the north at 60 feet	Residences to the east at 80 feet	Residences to the south at 130 feet	Wesleyan Methodist Church to the west at 80 feet
Vibratory Roller	94.0	82.6	78.8	72.5	78.8
Large Bulldozer	87.0	NA	71.8	65.5	71.8
Loaded Trucks	86.0	NA	70.8	NA	70.8
Static Roller	82.0	70.6	66.8	60.5	66.8
Jackhammer	79.0	67.6	63.8	57.5	63.8
Small Bulldozer	58.0	46.6	42.8	36.5	42.8
FTA Threshold	-	72	72	72	72
Exceeds Threshold?	-	Yes	Yes	Yes	Yes

Source: FTA 2018.
Bold numbers indicate values that exceed the FTA annoyance criteria.
NA= Not Applicable
Distances are from the nearest distance from where these equipment pieces may be used 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. 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. The nearest structure to proposed construction activities is the residences approximately 6 feet or less both to the north and south of the project site. If paving, demolition, grading, and earthwork equipment operates within approximately 5 feet or less of the residences, the 0.2 in/sec PPV threshold would be exceeded.

Table 9 Vibration Damage Levels for Typical Construction Equipment

Equipment	PPV (in/sec)				
	FTA Reference at 25 feet	Residences to the north at 40 feet	Residences to the east at 61 feet	Residences to the south at 6 feet	Wesleyan Methodist Church to the west at 65 feet
Vibratory Roller	0.21	0.104	0.055	**1.786**	0.052
Static Roller	0.05	0.025	0.013	**0.425**	0.012
Large Bulldozer	0.089	NA	0.023	NA	0.022
Loaded Trucks	0.076	NA	0.020	NA	0.019
Jackhammer	0.035	0.017	0.009	NA	0.009
Small Bulldozer	0.003	NA	0.001	NA	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 result in an exceedance of 0.2 in/sec PPV at nearby sensitive receptors to the south due to the proposed remodeling, resulting in a potentially significant impact, however, with implementation of Mitigation Measure N-2 these results would be reduced to less than significant.

Mitigation Measures

N-2 The Sacramento Unified School District shall ensure the following occur during construction activities:

- Vibratory compaction that is within 10 to 65 feet of any surrounding residential structure shall use a static roller in lieu of a vibratory roller. At a distance greater than 25 feet, a vibratory roller would no longer exceed 0.20 in/sec PPV but would exceed 72 VdB. Therefore, a static roller shall be used within 140 feet where levels would be reduced to 72 VdB or less and mitigate both vibration damage and vibration annoyance impacts.
- Paving activities within 10 feet of a residential structure will employ self-compacting pea gravel for the base and a concrete finish as to not require vibratory compaction nor static roller.
- Grading and earthwork activities within 15 feet of adjacent residential structures shall be conducted with off-road equipment that is limited to 100 horsepower or less.

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

No Impact. The proposed project is located approximately 2.1 miles west from the Sacramento Executive Airport (Airnav 2023). The proposed project would not expose people working in the project area to excessive aircraft noise levels. Thus, no impact would occur.

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 not increase the capacity of Nicholas Elementary School; student capacity would remain the same at 683 students. Therefore, the proposed project would not directly increase population growth in the area. No construction of homes or businesses is proposed, nor extension of roads or other infrastructure. Project implementation would not induce population growth and not 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 campus, with the exception of offsite improvements and the surrounding streets and sidewalk. No housing would be displaced or 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

a) Fire protection?

Less Than Significant Impact. The project site would be served by the Pacific Fruitridge Fire Protection District (PFFP); PFFP contracts with the City of Sacramento Fire Protection District for services. The closest fire station to the project site is Sacramento Fire Department Station 56, located on 3720 47th Street, in the unincorporated Sacramento County, approximately 1.10 miles northwest of the project site. The proposed project would not increase the number of students or staff onsite, and the site would continue to operate as a school. Both the City Fire Marshal and DSA would be required to approve fire access around the site. Additionally, the improvement of the onsite parking and queuing would remove congestion in the adjacent neighborhood. 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 Sheriff's Department at 7000 65th Street, in the City of Sacramento, approximately 0.6-mile southeast of the site. The student capacity of the proposed project would remain unchanged, and the site would continue to operate as a school. Furthermore, the improved parking onsite and queuing would remove congestion in the adjacent neighborhood, potentially reducing the response time 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 address the most critical physical needs of

buildings and grounds at the campus through the rebuilding and reconfiguration of buildings onsite. Once constructed, the new school facilities would continue to serve the existing Nicholas Elementary School program 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 Nicholas Elementary School's recreational facilities that are available for community use. The proposed project would provide a new soccer field that would be available to the public during non-school hours. A walking track would also be constructed around the perimeter of the field and the adjacent hardcourts. 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 Nicholas Elementary school would not require students to use existing neighborhood or regional parks. The proposed project would enhance and update the school's outdoor recreational spaces. The reconfiguration of the site would result in a new soccer field and basketball courts on the northeastern corner of the site. The new soccer field and basketball courts would also provide new recreational space for community use. Additionally, the proposed project would include hard courts and playgrounds available for student use. The student capacity would remain

unchanged after project implementation and impacts to offsite recreational facilities as a result of the proposed project would not result in negative impacts.

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. The proposed project includes the rebuilding and enhancing of 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:

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?

Less Than Significant With Mitigation Incorporated. –The proposed reconstruction of the elementary school would not adversely affect the school's vehicular facilities. The proposed modifications would, instead, result in an improvement to the school's site access, parking, and circulation system. The two existing midblock driveways on Steiner Drive would be replaced with two driveways on Steiner Drive that align with 50th Avenue and 51st Street. These intersection locations would improve safety and operations for motorists entering and exiting the parking lot. The new, larger parking lot would also provide a student drop-off/pick-up zone and a short-term parking area for kindergarten parents. These activities currently occur at on-street curb areas. In addition, a bus loading/unloading area would be provided in the new parking lot and a separate on-site bus loading/unloading area is being considered on the east side of the school campus adjacent to Vernace Way. These access, circulation, and parking improvements would result in increased safety for motorists and pedestrians.

3. Environmental Analysis

There is an existing signalized crosswalk on Steiner Drive midway between 50th Avenue and 51st Street. The traffic signal remains green until a pedestrian push button activates a red light for vehicular traffic and a "Walk" symbol for pedestrians to cross the street. The existing midblock crosswalk location would result in vehicle-pedestrian conflicts and safety issues as pedestrians using the crosswalk would have to walk across the entry driveway and thereby cross the travel route of incoming vehicles. With the implementation of Mitigation Measure TRAF-1, safety issues would be reduced to less than significant.

With regard to traffic impacts, there would be no change in the overall volumes of traffic that would be generated by the school because the new school would not result in an increase in the number of students or staff. The existing school and the new school both have a capacity of 683 students. During construction of the new school, students would attend Clayton B. Wire Elementary School, which is currently vacant. Parents would, however, have the option of dropping off and picking up students at the existing Nicholas Elementary School site. The students would be transported to and from the interim school in buses. The off-site pedestrian and bicycle access patterns to and from the school would remain largely unchanged, except for the recommended relocation of the crosswalk on Steiner Drive. The streets in the immediate vicinity of the school have sidewalks along both sides of the street and bike lanes are in place on both sides of Steiner Drive. Pedestrians and bicyclists would primarily enter the school campus from Steiner Drive at the new parking lot entrance and there would be secondary pedestrian entrances on Steiner Drive south of 51st Street and on Vernace Way on the east side of the school 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.

Sacramento Regional Transit District (SacRT) operates two bus routes in the vicinity of the Nicholas Elementary School campus. The bus route nearest the school is Route 68, which runs along 47th Avenue, which is approximately 750 feet north of the school site, and along Stockton Boulevard, which is approximately one-half mile east of the school site. Route 51 also runs along Stockton Boulevard. The school reconstruction project would not affect any public transportation facilities or operations; construction would occur within the project site, with the exception of offsite improvements (e.g., driveway cuts), and the number of students and staff would not change.

Mitigation Measures

TRAF-1 Subject to approval by the County of Sacramento, the signalized crosswalk on Steiner Drive midway between 50th Avenue and 51st Street shall be eliminated and replaced with a new crosswalk on Steiner Drive at 51st Street on the southside of the intersection. To ensure safety for pedestrians and vehicular traffic, three-way stop signs shall be installed at the Steiner Drive and 51st Street intersection (entrance to the new parking lot).

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 under CEQA. 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 eliminates auto delay, LOS, and other similar measures of vehicular capacity of 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. 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 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 describe 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 Impacts in CEQA" and the "Vehicle Miles Traveled – Focused Transportation Impact Study Guide," 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. As the proposed project would not result in an increase in the number of students at the school (683 existing and 683 proposed student capacity), the proposed project would have no impact on vehicle miles traveled, 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 outlined above, according to the County's Guidelines, the proposed project would have less than significant VMT impacts since it meets the screening criteria for local-serving public facilities/services. Since the proposed project would have no impact on VMT, it is screened out from further review. No impacts 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 occur via properly designed driveways, sidewalks, and on-site pedestrian pathways. The streets, intersections, driveways, and on-site circulation system are designed to accommodate the anticipated levels of vehicular and pedestrian activity and the public streets have historically been accommodating school-related traffic on a daily basis. The transportation system would be compatible with the design and operation of a school and would result in improved conditions relative to vehicular and pedestrian safety.

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 Fire Marshal. 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 any adverse changes to the access or circulation features at the school or on the surrounding streets and would, in fact, improve the access and circulation system at the school, there would be no impacts involving increased hazards due to a geometric design feature or incompatible uses.

d) Result in inadequate emergency access?

No Impact. The proposed access and circulation features at the school, including the driveways, on-site 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 school campus. Emergency vehicles could easily access the new buildings and all other areas of the school via on-site travel corridors. 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 Fire Marshal. Compliance with established design standards would ensure emergency access within the site is adequate. The proposed project would not, therefore, result in inadequate emergency access.

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 section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		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 Nicholas Elementary School; the project site is not identified as a state or national historic resource. Construction of the proposed project would be within footprint of the project and include offsite improvements (e.g. driveway cuts). 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 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 prehistory of the area.

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 replace the school's existing facilities with new facilities. Although the project site is currently developed, and is not within an area of moderate or high sensitivity for prehistoric cultural resources, 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 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 landscapes, 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 the redesign and reconstruction of Nicholas Elementary School, which is not expected to increase in capacity. Under the proposed project, the site would be reconfigured, requiring the site's utility connections to be reconfigured. As such, the proposed project would remove all existing utilities onsite and provide new utilities in addition to replacing existing connections off-site. 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 (RWQCB) (Region 5). California American Water provides the water service to the area of the County containing the project site (Sacramento County 2021b). As student capacity at the school would remain unchanged, the water needs of the school are expected to be similar 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 wastewater treatment provider, which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. The Sacramento Area Sewer District is responsible for the collection of wastewater within the portion of the County that contains the project site. Wastewater is treated at the Sacramento Regional Wastewater Treatment Plant which has an average dry weather flow capacity of 181 million gallons per day (CRWQCB 2021). The proposed project would not increase capacity at the school; 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, and therefore, generation of waste during operational activities would be similar to 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 and the County's recycling and waste programs. 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 post-construction. Additionally, 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 project site would include pervious and impervious surfaces. According to CAL FIRE, the project site is not within a Very High Fire Hazard Severity Zone (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 California Building and Fire Codes, impacts would be less than significant.

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

Less Than Significant Impact. 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 increase fire risk, and 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. The project site not within a mapped landslide hazard area (CDC 2022d). Additionally, the project site is located within Zone X, Areas with Reduced Flood Risk Due to Levee (Flood Insurance Rate Map ID #06067C0190H) (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 school site as well as improve parking and queuing onsite. The proposed project would not result in an increase in student capacity. The 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 off-site improvements to sidewalks and driveway curb cuts and the potential replacement of underground utilities. No sensitive animal or plant species would be impacted. Additionally, the implementation of Mitigation Measures BIO-1, BIO-2, CUL-1, GEO-1, and TCR-1 would ensure that biological, 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 facility. The proposed project would not result in an increase 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 implementation of Mitigation Measure TRAF-1 would replace the signalized crosswalk on Steiner Drive with a new crosswalk on Steiner Drive at 51st Street, and install three-way stop signs. The new, larger parking lot would also provide a student drop-off/pick-up zone and a short-term parking area for kindergarten parents. These activities currently occur at on-street curb areas. In addition, a bus loading/unloading area would be provided in the new parking lot and a separate on-site bus loading/unloading area is being considered on the east side of the school campus adjacent to Vernace Way.

The proposed project would not result in an increase 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. The proposed project would also adopt Mitigation Measure N-2 which provides standards that would implemented during construction to reduce vibration impacts. Impacts would be less than significant with mitigation incorporated.

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