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SCHOOL CLOSURE/CONSOLIDATION PROGRAM PROJECT

Amador County Unified School District

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PLACEWORKS

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Abbreviations and Acronyms

ABBREVIATIONS AND ACRONYMS

°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
AAQS	ambient air quality standards
AAD	Amador Air District
AB	Assembly Bill
ACF	Advanced Clean Fleets
ACMC	Amador County Municipal Code
ACT	Advanced Clean Trucks
ACTC	Amador County Transportation Commission
ACUSD	Amador County Unified School District
APCD	Air Pollution Control District
APN	Assessor's Parcel Number
AQ	Air Quality
AsD	rocky silt loam
BACT	Best Available Control Technology
BCECP	Basic Construction Emission Control Practice
BES	Battery Energy Storage
BSA	Biological Study Areas
C	land use designation of Commercial
C-2	zoning of Commercial
C-3	Heavy Commercial
C-T	Commercial Transition
CAA	Clean Air Act
CAFE	Corporate Average Fuel Economy
CBC	California Building Code
CGS	California Geologic Survey
CAISO	California Independent System Operator
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CALGreen	California Green Building Standards Code
CALINE4	California Line Source Dispersion Model
CARB	California Air Resources Board
CBC	California Building Code
CCR	California Code of Regulations
CCRH	State Historical Resources Commission
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CGS	California Geological Survey
CH_4	methane

Abbreviations and Acronyms

CO_2	carbon dioxide
CO_2e	Carbon-dioxide-equivalent
CO	carbon monoxide
CPUC	California Public Utilities Commission
DPM	diesel particulate matter
DSA	Division of State Architects
DT	Downtown Transition
EAP	Energy Action Plan
Ei	Eocene Ione Formation
EIR	environmental impact report
EMFAC	On-Road Mobile-Source Emission Factors
EO	Executive Order
EPA	Environmental Protection Agency
ES	Elementary School
ESA	Endangered Species Act
GC	General Commercial
GHG	greenhouse gas
gw	gigawatts
GWP	Global warming potential
H_2S	hydrogen sulfide
HC	Historic Commercial
HCFC	Hydrochlorofluorocarbons
HCP	Habitat Conservation Plan
HFC	Hydrofluorocarbons
HRA	Health risk assessment
HS	High School
HVAC	heating, ventilation and air conditioning
IMC	Ione Municipal Code
IRP	Integrated Resource Plan
Jlp	Logtown Ridge Formation
JMC	Jackson Municipal Code
lbs/day	pounds per day
LC	Limited Commercial
LED	Light Emitting Diodes
LEED	Leadership in Energy and Environmental Design
LOS	level of service
LSAA	Lake or Streambed Alteration Agreement
LSE	load-serving entities
LTC	Local Transportation Commission
M-1	Industrial

Abbreviations and Acronyms

M-2	Industrial and Mining
MBTA	Migratory Bird Treaty Act
MCAB	Mountain Counties Air Basin
MMRP	Monitoring and Reporting Program
MMTCO2e	Million metric tons of CO_2e
Mph	miles per hour
MPO	Metropolitan Planning Organization
MSL	mean sea level
Mt	Mokelumne soils
$MTCO_2e$	Metric ton of CO_2e
NAHC	Native American Heritage Commission
NEV	Neighborhood Electric Vehicles
NMFS	National Marine Fisheries Service
NRHR	National Register of Historic Places
N_2O	nitrous oxide
NO_X	nitrogen oxides
NO_2	nitrogen dioxide
NOA	naturally occurring asbestos
NOP	notice of preparation
NPDES	National Pollutant Discharge Elimination System
O_3	ozone
OEHHA	Office of Environmental Health Hazards Assessment
OS	Open Space
P	Public
Pb	lead
PD	Planned Development
PF	Public Facilities
PFC	Perfluorocarbons
PG&E	Pacific Gas & Electric
$PM_{2.5}$	fine inhalable particulate matter
PM_{10}	coarse inhalable particulate matter
ppb	parts per billion
ppm	parts per million
PO	Professional Office
PR	Parks and Rec
PRC	Public Resources Code
PS	Public Service
R-1	One Family Dwelling
R-2	Limited Multiple Family
RbD	Red Bluff-Mokelumne complex

Abbreviations and Acronyms

RD	Residential Duplex
RL	Low Density Residential
RM	Residential Medium Density
ROG	reactive organic gas
RPS	California Renewables Portfolio Standard
RSF	Residential Single Family
RTP	Regional Transportation Plan
RTPA	Regional Transportation Planning Agency
SAFE	Safer Affordable Fuel Efficient
SB	Senate Bill
SCMC	Sutter Creek Municipal Code
SF_6	sulfur hexafluoride
SIP	state implementation plan
SMAQMD	Sacramento Metropolitan Air Quality Management District
SPA	Special Planning Area
SO_2	sulfur dioxide
SR	State Route
RWQCB	Regional Water Quality Control Board
TAC	toxic air contaminants
TDA	Transportation Development Act
TK	Transitional Kindergarten
TOS	thresholds of significance
TRU	Transport Refrigeration Units
USC	United States Code
USDA	United States Department of Agriculture
USACE	U.S. Army Corps of Engineers
USEPA	United States Environmental Protection Agency
VMT	vehicle miles traveled
VOC	volatile organic compound
ZEV	zero-emission vehicle

Abbreviations and Acronyms

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1. Executive Summary

1.1 INTRODUCTION

This draft environmental impact report (DEIR) addresses the environmental effects associated with the implementation of the proposed School Closure/Consolidation Program Project (proposed project). The California Environmental Quality Act (CEQA) requires that local government agencies consider the environmental consequences before taking action on projects over which they have discretionary approval authority. An Environmental Impact Report (EIR) analyzes potential environmental consequences in order to inform the public and support informed decisions by local and state governmental agency decision makers.

This DEIR has been prepared pursuant to the requirements of CEQA and the Amador County Unified School District's (ACUSD or District) CEQA procedures. The ACUSD, as the lead agency, has reviewed and revised all submitted drafts, technical studies, and reports as necessary to reflect its own independent judgment, including reliance on City technical personnel from other departments and review of all technical subconsultant reports.

Data for this DEIR derive from onsite field observations, discussions with affected agencies, analysis of adopted plans and policies, review of available studies, reports, data and similar literature, and specialized environmental assessments (aesthetics, air quality, biological resources, cultural resources, energy, geological resources, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, recreation, transportation and traffic, tribal cultural resources, utilities and service systems, and wildfire).

1.2 ENVIRONMENTAL PROCEDURES

This DEIR has been prepared pursuant to CEQA to assess the environmental effects associated with implementation of the proposed project as well as anticipated future discretionary actions and approvals. CEQA established six main objectives for an EIR:

1. Disclose to decision makers and the public the significant environmental effects of proposed activities.
2. Identify ways to avoid or reduce environmental damage.
3. Prevent environmental damage by requiring implementation of feasible alternatives or mitigation measures.
4. Disclose to the public reasons for agency approval of projects with significant environmental effects.
5. Foster interagency coordination in the review of projects.
6. Enhance public participation in the planning process.

1. Executive Summary

An EIR is the most comprehensive form of environmental documentation in CEQA and the CEQA Guidelines; it is intended to provide an objective, factually supported analysis and full disclosure of the environmental consequences of a proposed project with the potential to result in significant, adverse environmental impacts.

An EIR is one of various decision-making tools used by a lead agency to consider the merits and disadvantages of a project that is subject to its discretionary authority. Before approving a proposed project, the lead agency must consider the information in the EIR; determine whether the EIR was prepared in accordance with CEQA and the CEQA Guidelines; determine that it reflects the independent judgment of the lead agency; adopt findings concerning the project's significant environmental impacts and alternatives; and adopt a statement of overriding considerations if significant impacts cannot be avoided.

1.2.1 EIR Format

Chapter 1. Executive Summary: Summarizes the background and description of the proposed project, the format of this EIR, project alternatives, any critical issues remaining to be resolved, and the potential environmental impacts and mitigation measures identified for the project.

Chapter 2. Introduction: Describes the purpose of this EIR, background on the project, the notice of preparation, the use of incorporation by reference, and Final EIR certification.

Chapter 3. Project Description: A detailed description of the project, including its objectives, its area and location, approvals anticipated to be required as part of the project, necessary environmental clearances, and the intended uses of this EIR.

Chapter 4. Environmental Setting: A description of the physical environmental conditions in the vicinity of the project as they existed at the time the notice of preparation was published, from local and regional perspectives. These provide the baseline physical conditions from which the lead agency determines the significance of the project's environmental impacts.

Chapter 5. Environmental Analysis: Each environmental topic is analyzed in a separate section that discusses: the thresholds used to determine if a significant impact would occur; the methodology to identify and evaluate the potential impacts of the project; the existing environmental setting; the potential adverse and beneficial effects of the project; the level of impact significance before mitigation; the mitigation measures for the proposed project; the level of significance after mitigation is incorporated; and the potential cumulative impacts of the proposed project and other existing, approved, and proposed development in the area.

Chapter 6. Significant Unavoidable Adverse Impacts: Describes the significant unavoidable adverse impacts of the proposed project.

Chapter 7. Alternatives to the Proposed Project: Describes the alternatives and compares their impacts to the impacts of the proposed project. Alternatives include the No Project Alternative, School Consolidation at Ione Junior High School, Amador High School, and Argonaut High School, and School Consolidation at Amador High School and Argonaut High School.

Chapter 8. Impacts Found Not to Be Significant: Briefly describes the potential impacts of the project that were determined not to be significant and were therefore not discussed in detail in this EIR.

Chapter 9. Significant Irreversible Changes Due to the Proposed Project: Describes the significant irreversible environmental changes associated with the project.

Chapter 10. Growth-Inducing Impacts of the Project: Describes the ways in which the proposed project would cause increases in employment or population that could result in new physical or environmental impacts.

Chapter 11. Organizations and Persons Consulted: Lists the people and organizations that were contacted during the preparation of this EIR.

Chapter 12. Qualifications of Persons Preparing EIR: Lists the people who prepared this EIR for the proposed project.

Appendices: The appendices for this document comprise these supporting documents:

- Appendix A: NOP
- Appendix B: NOP Public and Agency Comments
- Appendix C: Air Quality and Greenhouse Gas Modeling
- Appendix D: Archaeological Resources and Architectural History Inventory and Evaluation Report
- Appendix E: Biological Resources Assessment
- Appendix F: Paleontological Assessment Memorandum
- Appendix G: EPA Correspondence
- Appendix H: Noise Impact Assessment
- Appendix I: Response to Service Letters
- Appendix J: CEQA Transportation Memorandum
- Appendix K: Transportation Operations Memorandum
- Appendix L: VMT Memo for Alternatives

1.2.2 Type and Purpose of This DEIR

This DEIR has been prepared as a "Project EIR," defined by Section 15161 of the CEQA Guidelines (California Code of Regulations, Title 14, Division 6, Chapter 3). This type of EIR examines the environmental impacts of a specific development project and should focus primarily on the changes in the environment that would result from the development project. The EIR shall examine all phases of the proposed project including planning, construction, and operation.

1.3 PROJECT LOCATION

1.3.1 Regional Location

ACUSD is the only public school district serving Amador County. The county is located approximately 45 miles southeast of Sacramento in the Sierra Nevada Mountain Range. The county is surrounded by El Dorado County to the north, Alpine County to the east, Calaveras County to the south, San Joaquin County to the southwest, and Sacramento County to the west. The northeast portion of the county is within The Eldorado National Forest.

1.3.2 Project Site

The proposed project would affect eight of ACUSD's school campuses: Amador High School (HS), Argonaut HS, Ione Junior HS, Jackson Junior HS, Ione Elementary School (ES), Jackson ES, and Sutter Creek ES.[1]

Amador High School

Amador HS is located at 330 Spanish Street, Sutter Creek, California, 95685, in the northern part of the city. The site has an Assessor's Parcel Number (APN) of 018-020-029-000. It is approximately 0.3 miles east of State Route 49 (SR 49) and is immediately south of Sutter Creek ES.

Argonaut High School

Argonaut HS is located at 501 Argonaut Lane, Jackson, California, 95642, in the northwest corner of the city. The site has an APN of 044-100-009-000. It is approximately 0.47 miles west of State Route 88 (SR 88) and 0.5 miles south of SR 49. Sutter Creek is located approximately 0.2 miles south of the campus.

Ione Junior High School

Ione Junior HS is located at 450 South Mills Street, Ione, California, 95640, in the southern part of the city. The site has an APN of 004-250-001-000. It is approximately 0.08 miles west of State Route 124 (SR 124) and approximately 0.18 miles south of Dry Creek. This campus is approximately 0.17 miles east of Ione ES.

Jackson Junior High School

Jackson Junior HS is located at 747 Sutter Street, Jackson, California, 95642, in the western part of the city. The site has an APN of 020-161-001-000. It is approximately 0.09 miles west of SR 88 and approximately 0.3 miles north of Jackson Creek.

[1] Sutter Creek ES has two campuses.

Ione Elementary School

Ione ES is located at 415 South Ione Street, Ione, California, 95640, in the southern part of the city. The site as an APN of 004-261-002-000. It is directly west of State Route 104 (SR 104) and approximately 0.15 miles east of SR 124. This campus is 0.17 miles east of Ione Junior HS.

Jackson Elementary School

Jackson ES is located at 220 Church Street, Jackson, California, 95642, in the center of the city. The site has an APN of 020-198-017-000. It is approximately 0.14 miles east of SR 49 and approximately 0.2 miles west of SR 88. Jackson Creek is located approximately 0.2 miles south of the campus.

Sutter Creek Elementary School

Sutter Creek ES has two campuses. One is located at 340 Spanish Street, Sutter Creek, California, 95685, in the northern part of the city and directly north of Amador HS. This site has an APN of 018-020-030-000. It is approximately 0.3 miles east of SR 49. The other campus is located at 110 Broad Street, Sutter Creek, California, 95685 with an APN of 018-133-009-000. It is approximately 0.5 miles southeast of Amador HS and the Spanish Street location. This campus is approximately 0.75 miles east of SR 49.

1.4 PROJECT SUMMARY

ACUSD proposes to consolidate eight school campuses onto six current ACUSD campuses. This would require physical site improvements at three campuses: Argonaut HS, Ione Junior HS, and Sutter Creek ES; the closure of Ione ES and Sutter Creek Primary School, Sutter Creek ES's second campus, for later disposition; and the creation of a county preschool. The proposed project would not change the elementary school attendance boundaries. The proposed project would change the junior high school boundaries and the high school boundaries.

School Closure/Consolidation Program

The District proposes to combine Amador HS and Argonaut HS at Argonaut HS. This would change the enrollment capacity from 925 students to 1,325 students and would continue to serve grades 9 through 12. The number of teaching stations would increase from 37 to 53. This campus would require site improvements to accommodate the increase in enrollment (further discussed below).

The District proposes to combine Ione Junior HS and Jackson Junior HS at Amador HS. This change would not affect the enrollment capacity (875 students) of the campus nor the number of teaching stations 35 teaching stations). The campuses would serve grades 7 through 8 instead of grades 9 through 12. No building or site improvements are proposed at this campus.

The District proposes to relocate Ione ES to Ione Junior HS and would add 2 additional classrooms for pre-school and transitional kindergarten (TK) to the campus. This would change the enrollment capacity of the campus from 775 students serving grades 6 through 8 to 801 students serving preschool and grades TK through

6. Teaching stations would increase from 31 to 33 by adding 2 preschool/transitional kindergarten classrooms. This campus would require site improvements to accommodate the increase in enrollment.

The District would convert Jackson Junior HS into the County Preschool Center. This would change the enrollment capacity and grade levels from 475 students of grades 6 through 8, to a potential maximum capacity of 195 preschool and TK students. The number of teaching stations would decrease from 19 to 15. Restrooms and fountains would be converted to have age-appropriate fixtures, but site improvements would not be required.

The District would add grade 6 to Jackson ES. The enrollment capacity of 575 students and 23 teaching stations would remain the same. No site improvements would be required at this campus.

The District would expand Sutter Creek ES to create a TK through 6 grade campus. This would increase the enrollment capacity from 325 students of grades 3 through 6 to 625 students of grades TK through 6. The number of teaching stations would increase from 13 to 25. To accommodate the increase in students, site improvements would be required.

Sutter Creek Primary School (at 110 Board Street in the city of Sutter Creek) and Ione ES close for later disposition.

For a complete description of all improvements, see Chapter 3, *Project Description*.

1.5 SUMMARY OF PROJECT ALTERNATIVES

CEQA Guidelines Section 15126.6 requires that an EIR describe a range of reasonable alternatives to a project that could feasibly attain the basic objectives of a project and avoid or lessen the environmental effects of a project. While the District considered various options and recommendations during the scoping process, the final selection of alternatives was based on CEQA Guidelines Section 15126.6(f), which states that the selection of alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project.

Based on the criteria listed in Chapter 7, *Alternatives*, the following three alternatives have been determined to represent a reasonable range of alternatives that have the potential to feasibly attain most of the basic objectives of the proposed project but may avoid or substantially lessen any of the significant effects of the project. These alternatives are summarized in the following sections.

- **Alternative 1**: No-Project Alternative
- **Alternative 2**: School Consolidation at Ione Junior High School, Amador High School, and Argonaut High School
- **Alternative 3**: School Consolidation at Amador High School and Argonaut High School

1.5.1 No-Project Alternative

The CEQA Guidelines require analysis of a No Project Alternative. The purpose of this Alternative is to describe and analyze a scenario under which the proposed project is not implemented so that decision makers can compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project Alternative analysis must discuss the existing site conditions as well as what would reasonably be expected to occur in the foreseeable future based on any current plans, and it must be consistent with available infrastructure and community services.

Under the No Project Alternative, the proposed consolidation and closure of schools, as well as site improvements would not occur; all schools would remain as-is. More specifically, Amador and Argonaut High Schools would not be combined at Argonaut High School, Ione Elementary School would not move to Ione Junior High School to accommodate preschool and TK through sixth grade students, and Sutter Creek Elementary School would not expand to create a TK through sixth grade campus.

1.5.2 School Consolidation at Ione Junior High School, Amador High School, and Argonaut High School

Under Alternative 2, the District would consolidate students in an alternative structure for ACUSD campuses which would include Ione Junior High School, Amador High School, and Argonaut High School. Under this Alternative, Ione students from preschool through 8th grade would attend school at the Ione Junior High School campus. This would relocate students from Ione Elementary School to the Ione Junior High School campus, creating a comprehensive campus, and allowing students to stay until 8th grade. The anticipated student population at the Ione Junior High School campus under this Alternative would be approximately 767 students. Additionally, the campus would require further construction and the addition of two new teaching stations on the campus to accommodate the new student population.

Under Alternative 2, Amador High School would serve all county students outside of Ione in grades 7 and 8. Similar to the proposed project, this change would not affect the enrollment capacity of 875 students on the campus, and it would not affect the number of teaching stations. No building or site improvements would be proposed at the campus.

In addition, Argonaut High School would serve all county students in grades 9 through 12 under Alternative 2. Similar to the proposed project, this would change the enrollment capacity on the campus from 925 students to 1,325 students, and increase the number of teaching stations from 37 to 53. This campus would require site improvements to accommodate the increase in enrollment.

Improvements to all other District campuses, including Sutter Elementary School, would remain the same as the proposed project. Sutter Creek Primary would remain open under Alternative 2.

1.5.3 School Consolidation at Amador High School and Argonaut High School

Under Alternative 3, the District would balance enrollment between two high school campuses, including Amador High School and Argonaut High School. Under this alternative, 7th through 9th grade students would attend Amador HS and 10th through 12th grade students would attend Argonaut High School. Student enrollment and enrollment capacity at Amador HS would be anticipated to increase by 335 students (938 total) and 100 students (975 students), respectively, compared to the proposed project. Four classrooms would be added to the campus.

Improvements at Argonaut High School under Alternative 3, would require the construction of 2 new classrooms and the relocation of one portable office from Jackson JHS.

Improvements to all other District campuses, including Ione Junior High School, would remain the same as the proposed project. Sutter Creek Primary would remain open under Alternative 3.

1.6 ISSUES TO BE RESOLVED

The CEQA Guidelines Section 15123(b)(3) requires that an EIR contain issues to be resolved, including the choice among alternatives and how to mitigate significant impacts. With regard to the Proposed Project, the major issues to be resolved include decisions by the lead agency as to:

1. Whether this DEIR adequately describes the environmental impacts of the project.
2. Whether the benefits of the project override those environmental impacts which cannot be feasibly avoided or mitigated to a level of insignificance.
3. Whether the proposed land use changes are compatible with the character of the existing area.
4. Whether the identified goals, policies, or mitigation measures should be adopted or modified.
5. Whether there are other mitigation measures that should be applied to the project besides the Mitigation Measures identified in the DEIR.
6. Whether there are any alternatives to the project that would substantially lessen any of the significant impacts of the proposed project and achieve most of the basic project objectives.

1.7 AREAS OF CONTROVERSY

This DEIR has taken into consideration the comments received during the scoping period, from June 21, 2023 to July 20, 2023, in response to the NOP. Written comments received during the NOP period are contained in Appendix B of this DEIR.

In accordance with Section 15123(b)(2) of the CEQA Guidelines, the DEIR must identify areas of controversy known to the lead agency, including issues raised by agencies and the public. Areas of controversy concerning the proposed project have been identified and listed below. Though every concern applicable to the CEQA

process is addressed in this Draft EIR, this list below is not necessarily exhaustive, but rather attempts to capture concerns that are likely to generate the greatest interest based on the input received during the scoping process.

- Cultural and Tribal Cultural Resources. Addressed in Section 5.4, *Cultural Resources* and Section 5.16, *Tribal Cultural Resources*
- Hydrology and Water Quality: Addressed in Section 5.9, *Hydrology and Water Quality*
- Transportation: Addressed in Section 5.15, *Transportation*
- Utilities and service systems: Addressed in Section 5.17, *Utilities and Service Systems*

1.8 SUMMARY OF ENVIRONMENTAL IMPACTS, MITIGATION MEASURES, AND LEVELS OF SIGNIFICANCE AFTER MITIGATION

Table 1-1, *Summary of Environmental Impacts, Mitigation Measures, and Levels of Significance After Mitigation*, summarizes the conclusions of the environmental analysis contained in this DEIR. Impacts are identified as potentially significant, less than significant, or no impact, and mitigation measures are identified for all significant impacts. The level of significance after imposition of the mitigation measures is also presented.

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.1 AESTHETICS			
Impact 5.1-1: The proposed project would not have a substantial adverse effect on a scenic vista.	Less than significant.	No mitigation required	Less than significant.
Impact 5.1-2: The project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway.	Less than significant.	No mitigation required	Less than significant.
Impact 5.1-3: The project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from a publicly accessible vantage point.)	Less than significant.	No mitigation required	Less than significant.
Impact 5.1-4: The proposed project would not generate a substantial new source of light and glare.	Less than significant.	No mitigation required	Less than significant.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.2 AIR QUALITY			
Impact 5.2-1: The proposed project is consistent with the applicable air quality management plan.	Less than significant.	No mitigation required	Less than significant.
Impact 5.2-2: The proposed project would not result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.	Potentially Significant.	**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.	Less than significant.

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		• 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.	
		AQ-2 The soil haul duration associated with site preparation activity shall be no less than two days and the project shall require the construction contractor to use equipment that meets the United States Environmental Protection Agency (USEPA) Tier 4-interim emissions standards for off-road diesel-powered construction equipment with more than 100 horsepower, unless it can be demonstrated to the District that such equipment is not available. Any emissions-control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board's (CARB's) regulations. Prior to construction, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for USEPA Tier 4-interim or higher emissions	

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		standards for construction equipment over 100 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the District. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with CARB's Rule 2449.	
Impact 5.2-3: The proposed project could expose sensitive receptors to substantial pollutant concentrations.	Less than significant impact.	No mitigation required	Less than significant.
Impact 5.2-4: The proposed project would not result in other emissions that would adversely affect a substantial number of people.	Less than significant impact.	No mitigation required	Less than significant.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.3 BIOLOGICAL RESOURCES			
Impact 5.3-1: Development of the proposed project may have the potential to impact special status plants and animal species.	Potentially significant.	**BIO-1** **Focused Special-status Plant Survey.** Prior to any ground disturbing activities, a qualified biologist obtained by Amador County USD shall perform special-status plant surveys of all three BSAs according to CDFW, CNPS, and USFWS protocols (California Department of Fish and Game 2009; CNPS 2014; USFWS 1996). Surveys shall be conducted throughout all suitable habitat within the project footprints and a 50-foot buffer to address potential direct and indirect impacts of the project. Surveys shall be conducted by a qualified biologist and timed according to the identifiable period for target species (typically the blooming period). To the extent feasible, known reference populations will be visited prior to surveys to confirm target species are evident and identifiable at the time of the survey. If no special-status plants are found, no further measures pertaining to special-status plants are necessary. If special-status plants are identified within the BSA, the project shall be modified to the extent feasible to prevent disturbance or loss of special-status plants. Environmentally Sensitive Areas shall be established around sensitive plant	Less than significant with incorporation of Mitigation Measures BIO-1, BIO-2, and BIO-3.

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		populations in or adjacent to the BSA. Environmentally Sensitive Areas shall have a 50-foot buffer unless otherwise determined by a qualified biologist in coordination with the appropriate resource agency. Buffer distances may vary between species depending on listing status, rarity, and other factors. Environmentally Sensitive Areas will be clearly demarcated in the field, and no construction or ground-disturbing activities will occur within the boundaries of the delineated area. If special-status plant species are found and avoidance is not feasible, additional measures may be developed in consultation with CDFW, USFWS, and/or the Amador County USD. These measures may include restoration or permanent preservation of habitat for special-status plant species or translocation (via seed collection and/or transplantation) from planned impact areas to unaffected suitable habitat. If a state or federally listed threatened or endangered plant or a plant that is a candidate for state listing is found with the BSA, the applicant shall consult with CDFW and/or USFWS, as applicable, to determine appropriate avoidance and minimization measures. If the plants cannot be avoided, an incidental take permit and compensatory mitigation may be required. **BIO-2** **Pre-construction Nesting Bird Survey**. Prior to any ground disturbing activities, a qualified biologist obtained by Amador County USD shall conduct a pre-construction nesting bird survey of all suitable habitats within and adjacent to the BSAs within 14 days prior to the commencement of construction during the nesting season (February 1 to August 31). The survey shall be conducted within a 300-foot radius of project work areas for nesting raptors and a 100-foot radius for passerines. If active nests are found, a no-disturbance buffer shall be established around the nest. The buffer distance shall be established by a qualified biologist. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest tree, to be determined by a qualified biologist. Once the young are independent of the nest, the buffer shall be removed. **BIO-3** **Special-Status Bats Roosting Survey and Habitat Assessment.** Prior to any ground disturbing activities, a qualified biologist obtained by Amador County USD	

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		shall perform a focused bat roost survey and habitat assessment for Argonaut and Ione BSAs. The initial survey shall be conducted as early in the planning process as possible, to allow for avoidance of project-related impacts during critical periods of the bat's life cycle. During the survey, potential roost sites shall be evaluated and inspected for presence or sign of roosting bats. Surveys may be aided by the use of night-vision goggles or acoustic equipment to determine if roosting bats are present and to help aid in species identification. If use of the Argonaut and/or Ione BSAs by roosting bats is confirmed, identified bat roosting sites shall be avoided and protected in place to the extent feasible. A buffer area shall be established around the roost site to minimize disturbance of roosting bats. The size of the buffer area will depend on the species and type of roost present (e.g., maternity roost, day roost, hibernacula), and will be determined in consultation with CDFW. If avoidance is not possible, and a tree or structure with bat roosting habitat must be removed, the applicant shall consult with CDFW regarding appropriate avoidance and mitigation measures. Measures may include restrictions on timing or methods of roost removal to avoid potential injury or death of individual bats, as well as replacement of removed bat habitat features. In general, removal of bat roost sites shall be timed to occur outside of the maternity roosting season (generally April 1 to August 31) and only when nighttime low temperature are above 45°F and rainfall is less than 0.5 inch in 24 hours. If a maternity colony is present, it shall remain undisturbed until the young are volant (able to fly) and the colony has dispersed, as confirmed by a qualified bat biologist. Where feasible, bat exclusion devices or one-way doors may be used to exclude bats from roost sites prior to removal. Trees with identified bat roosting habitat shall be removed using a two-phase removal process conducted over two consecutive days. On the first day, tree limbs and branches will be removed, using chainsaws only. Removal will avoid limbs with cavities, cracks, crevices, or deep bark fissures. On the second day, the entire tree will be removed.	

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Standing dead trees or snags with habitat features should be removed over a single day by gently lowering the tree or snag to the ground. The tree or snag shall be left undisturbed onsite for the next 48 hours. Removal and trimming of trees with potential roosting habitat shall be conducted in the presence of a biological monitor.	
Impact 5.3-2: Development of the proposed project would not result in the loss of any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.	Less than significant impact.	No mitigation required.	Less than significant.
Impact 5.3-3: The proposed project would not have a substantial adverse effect on state or federally protected wetlands through the direct removal, filling, hydrological interruption or other means.	Less than significant impact.	No mitigation required.	Less than significant.
Impact 5.3-4: The proposed project would affect wildlife movement or a wildlife corridor species; however, the proposed project could interfere with a native wildlife nursery site.	Potentially significant.	Mitigation Measures BIO-2 and BIO-3 described above.	Less than significant with incorporation of Mitigation Measure BIO-2 and BIO-3.
Impact 5.3-5: The proposed project would not compliance with local policies or ordinances protecting biological resources.	Less than significant impact.	No mitigation required.	Less than significant.
Impact 5.3-6: The proposed project would not compliance with an adopted NCCP/HCP protecting biological resources	No Impact	No mitigation required.	No Impact.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.4 CULTURAL RESOURCES			
Impact 5.4-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.	Less than significant impact.	No mitigation required	Less than significant.
Impact 5.4-2: Development of the proposed project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.	Potentially significant.	Mitigation Measures TCR-1 described below.	Less than significant with incorporation of Mitigation Measure TCR-1.
Impact 5.4-3: Grading activities could potentially disturb human remains.	Potentially significant.	Mitigation Measures TCR-1 described below.	Less than significant with incorporation of Mitigation Measure TCR-1.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.5 ENERGY			
Impact 5.5-1: Project construction and operation would not cause wasteful, inefficient, or unnecessary energy use.	Less than significant impact.	No mitigation required	Less than significant.
Impact 5.5-2: Project development would not conflict with a State or local plan for renewable energy or energy efficiency.	Less than significant impact.	No mitigation required	Less than significant.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.6 GEOLOGY AND SOILS			
Impact 5.6-1: The occupants at project sites at Argonaut HS, Ione Junior HS, and Sutter Creek ES may be subject to ground shaking typical of Northern California; however, project development would not subject people or structures to rupture, seismic-related ground failure including liquefaction, and landslides.	Less than significant.	No mitigation required	Less than significant.

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.6-2: The proposed project would not result in substantial soil erosion or loss or topsoil.	Less than significant.	No mitigation required	Less than significant.
Impact 5.6-3: Site improvements at Argonaut HS, Ione Junior HS, and Sutter Creek ES would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse; are not located on expansive soils; and would not create a direct or indirect risk to life and property.	Less than significant.	No mitigation required	Less than significant.
Impact 5.6-4: The proposed project would not include the installation of septic tanks.	No Impact.	No mitigation required.	No Impact.
Impact 5.6-4: The proposed project would not directly or indirectly destroy a unique geologic feature, and with the incorporation of Mitigation Measure GEO-1, the proposed project would not directly or indirectly destroy a paleontological resource.	Potentially Significant.	**GEO-1** Prior to earthwork activities, the District shall retain a qualified paleontological monitor to monitor earthwork activities at Ione Junior HS. The qualified paleontological monitor shall be equipped to salvage fossils and samples of sediments of potential paleontological resources. In the event that a paleontological resource is unearthed, a paleontological monitoring plan shall be implemented to inform the District and construction personnel of monitoring and implementing protocols during ground disturbance. Groundwork around the find shall halt until the qualified paleontological monitor assesses the resource. The paleontological monitor may establish a protected buffer around the find for the duration of recovery of the resource and has authorized the resumption of construction activities. Recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Found specimens shall be curated into the UC Museum of Paleontological Specimens or other responsible public or private institution with a suitable repository willing to and capable of accepting and housing the resource. If no museum or repository is willing to accept the resource, it shall be considered the property of the District and may be stored, disposed of, transferred, exchanged, or otherwise handled by the County at its discretion.	Less than significant with incorporation of Mitigation Measure GEO-1.

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		Upon completion of earthwork activities and if paleontological resources are found, the qualified paleontological monitor shall prepare a report of paleontological resource findings within 30 days of earthwork completion. The report shall append itemized inventory of recovered resources, documentation of each locality, and interpretation of recovered fossils. The report and inventory, when submitted and approved by the District, will signify completion of the program to mitigate impacts to paleontological resources. At Argonaut HS and Sutter Creek ES, the qualified paleontologist shall conduct a spot check of construction activities once ground disturbance begins.	
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.7 GREENHOUSE GAS EMISSIONS			
Impact 5.7-1: The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.	Less than significant.	No mitigation required	Less than significant.
Impact 5.7-2: The proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.	Less than significant.	No mitigation required	Less than significant.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.8 HAZARDS AND HAZARDOUS MATERIALS			
Impact 5.8.1: Project implementation would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.	Less than significant.	No mitigation required	Less than significant.
Impact 5.8-2: Project implementation would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions	Less than significant.	No mitigation required	Less than significant.

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
involving the release of hazardous materials into the environment.			
Impact 5.8-3: Project implementation would not handle hazardous or acutely hazardous materials, or substances, within one-quarter mile of an active school.	Less than significant.	No mitigation required	Less than significant.
Impact 5.8-4: Project implementation would not pose a significant hazard to the public or the environment.	Less than significant.	No mitigation required	Less than significant.
Impact 5.8-5: Project implementation would not conflict with an airport land use plan.	Less than significant.	No mitigation required	Less than significant.
Impact 5.8-6: Project implementation would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Less than significant.	No mitigation required	Less than significant.
Impact 5.8-7: Project implementation would not expose structures and/or residences to wildfire.	Less than significant.	No mitigation required	Less than significant.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.9 HYDROLOGY AND WATER QUALITY			
Impact 5.9-1: Project implementation would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.	Less than significant.	No mitigation required	Less than significant.
Impact 5.9-2: Project implementation would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project	Less than significant.	No mitigation required	Less than significant.

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
may impede sustainable groundwater management of the basin.			
Impact 5.9-3: The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: i)Result in a substantial erosion or siltation on- or off-site. ii)Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site. iii)Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff. iv)Impede or redirect flood flows.	Potentially Significant.	Mitigation Measures USS-2 described below.	Less than significant with incorporation of Mitigation Measure USS-2.
Impact 5.9-4: Project implementation would not risk the release of pollutants due to project inundation.	Less than significant.	No mitigation required	Less than significant.
Impact 5.9-5: Project implementation would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.	Less than significant.	No mitigation required	Less than significant.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.10 LAND USE AND PLANNING			
Impact 5.10-1: Project implementation would not physically divide an established community.	Less than significant.	No mitigation required	Less than significant.
Impact 5.10-2: Project Implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect.	Less than significant.	No mitigation required	Less than significant.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.11 NOISE			
Impact 5.11-1: Construction activities would result in temporary noise increases in the vicinity of the proposed project that would not exceed local standards.	Less than significant.	No mitigation required	Less than significant.
Impact 5.11-2: Project implementation would result in long-term operation-related noise that would not exceed local standards.	Less than significant.	No mitigation required	Less than significant.
Impact 5.11-3: The project would not create excessive short- or long-term groundborne vibration and groundborne noise.	Less than significant.	No mitigation required	Less than significant.
Impact 5.11-4: The proximity of the project site to an airport or airstrip would not result in exposure of future resident and/or workers to airport-related noise.	Less than significant.	No mitigation required	Less than significant.
Cumulative Impact	Potentially Significant (Operational traffic impact)	No feasible mitigation measures are available to reduce the significant and unavoidable cumulative transportation impact.	Significant and Unavoidable

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
5.12 POPULATION AND HOUSING			
Impact 5.12-1: The proposed project would not result in population growth in the project area either directly or indirectly.	Less than significant.	No mitigation required	Less than significant.
Impact 5.12-2: Project implementation would not result in displacing people and/or housing.	No Impact.	No mitigation required.	No Impact.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.13 PUBLIC SERVICES			
FIRE PROTECTION AND EMERGENCY SERVICES			
Impact 5.13-1: The proposed project would introduce new structures and increase student enrollment capacities into the service boundaries of the Jackson Fire Department, Ione Fire Department, and Sutter Creek Fire Protection District, but would not new or physically altered fire protection facilities.	Less than significant.	No mitigation required	Less than significant.
POLICE PROTECTION			
Impact 5.13-2: The proposed project would increase student enrollment capacities in the service boundaries of the Jackson Police Department, Ione Police Department, and Sutter Creek Police Department, but would not require new or physically altered police protection facilities.	Less than significant.	No mitigation required	Less than significant.
SCHOOL SERVICES			
Impact 5.13-3: The proposed project would increase enrollment capacities at the Argonaut High School, Ione Junior High School, and Sutter Creek; however, the proposed project would not require new or physically altered	Less than significant.	No mitigation required	Less than significant.

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
school facilities beyond what is evaluated in this DEIR.			
LIBRARY SERVICES			
Impact 5.13-4: The proposed project would not generate new residents in the County, and therefore, would not exacerbate library services within the Amador County Library system.	Less than significant.	No mitigation required	Less than significant.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.14 RECREATION			
Impact 5.14-1: The proposed project would not generate additional residents nor students that would increase the use of existing park and recreational facilities that could cause a substantial physical deterioration of the facility to occur or be accelerated.	Less than significant.	No mitigation required	Less than significant.
Impact 5.14-2: Project implementation would not require the construction or expansion of recreational facilities nor result in the need for a new or physically altered park which might have an adverse physical effect on the environment.	Less than significant.	No mitigation required	Less than significant.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.15 TRANSPORTATION			
Impact 5.15-1: The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities	Less than significant.	No mitigation required	Less than significant.

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.15-2: The proposed project may conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).	Potentially Significant.	**T-1** The District shall develop and implement a Transportation Demand Management (TDM) plan that would encourage carpooling among students or use of alternative modes (bicycle, pedestrian, and transit). Elements of a TDM plan can consist of the following measures: • Distribution of information concerning alternative transportation options. • Hiring a travel demand management coordinator to administer the TDM program. • Develop and implement a ridesharing or carpooling program for students. The ridesharing "School Pool" program will help to match parents to transport students to/from campus. • Encourage the additional use of school buses.	Significant and unavoidable.
Impact 5.15-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).	Less than significant.	No mitigation required	Less than significant.
Impact 5.15-4: The proposed project would not result in inadequate emergency services.	Less than significant.	No mitigation required	Less than significant.
Cumulative Impact	Potentially Significant.	Mitigation Measure T-1, above.	Significant and unavoidable.
5.16 TRIBAL CULTURAL RESOURCES			
Impact 5.16-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is 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). The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead	Potentially Significant.	**TCR-1** Prior to the start of construction, Amador County Unified School District shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology. If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. The qualified professional archaeologist shall evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:	Less than significant with incorporation of Mitigation Measure TCR-1.

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
agency to be significant pursuant to criteria in Public Resources Code section 5024.1(c).		• If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required. • If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a historic property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the resource either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction. Treatment measures would include: o Any tribal cultural resources unearthed by project activities shall be evaluated by the qualified archaeologist. If the resources are Native American in origin, the proper Tribe(s) will retain it/them in the form and/or manner the Tribe(s) deems appropriate. o If the find is not a tribal cultural resource or the proper Tribe does not provide treatment measures, preservation in place (i.e., avoidance) is the preferred manner of treatment. 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. Any historic archaeological material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes. • If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist and Amador County Unified	

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		School District shall notify the Amador County Coroner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California PRC, and AB 2641 will be implemented. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (Section 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). This will also include either recording the resource with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.	
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.17 UTILITIES AND SERVICE SYSTEMS			
Wastewater Treatment and Collection			
Impact 5.17-1: Wastewater facilities would not be able to accommodate project-generated sewer demands.	Potentially Significant.	**USS-1** Prior to the start of construction, the ACUSD shall prepare site-specific water/wastewater infrastructure studies for the Argonaut HS, Ione Junior HS, and Sutter Creek ES to analyze the proposed improvements at these sites. The water/wastewater infrastructure studies shall include: • A detailed analysis of the peak wet weather sewer flow rates and volume over time to determine if there is the potential for surcharge conditions due to improvements and additional students at the three school sites. The analysis will include an investigation of inflow and infiltration issues and anticipated flows to lift-stations, sewer lines, and sewer meters. Estimated wastewater generation shall be calculated using the generation rates developed for the City	Less than significant with incorporation of Mitigation Measure USS-1.

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		of Sutter Creek Amador Regional Sanitation Authority's Wastewater Master Plan, California Green Building Standards and other applicable references that are approved by the Cities of Jackson, Ione, and Sutter Creek. If improvements at the school sites result in an exceedance of the permitted peak wet weather flows for the sewer system, the infrastructure studies shall identify measures that reduce peak wet weather flows to acceptable limits. The sewer infrastructure studies for Argonaut HS, Ione Junior HS, and Sutter Creek ES shall be submitted to the Public Works Departments of the cities of Jackson, Ione, and Sutter Creek, respectively, for review and approval. No grading permits shall be issued until the proposed sewer infrastructure design for each school site has been approved by the city or agency within its jurisdiction and sewer system improvements have been approved, if necessary. Payment of development impact fees may also be required per local regulations. • An evaluation of the water capacity of existing water service lines, water meters, and distribution pipelines and anticipated water demands at the three school sites to determine if the capacities of the Ione water system and the Tanner water system are adequate to accommodate the additional water demands. The infrastructure study would also include an evaluation of fire service and/or fire hydrant requirements. If the increased water demands at the school sites result in an exceedance of the capacity of the water treatment systems or distribution systems, the studies shall identify necessary upgrades or modifications to the water distribution systems. The ACUSD shall be responsible for the payment of additional capacity fees as deemed appropriate by the water providers. If the water infrastructure studies show that there is a net increase in water demand at the school sites, the ACUSD will obtain a Will Serve letter from the Amador Water Agency (AWA). The water infrastructure studies for Argonaut HS, Ione Junior HS, and Sutter Creek ES shall be submitted to the Amador Water Agency for review and approval. No grading permits shall be issued until approval and will serve letters have been obtained from the water service providers.	

1. Executive Summary

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.17-2: Project-generated wastewater would not be adequately treated by the wastewater service provider for the project.	Potentially significant.	Mitigation Measures USS-1 described above.	Less than significant with incorporation of Mitigation Measure USS-1.
Water Supply and Distribution Systems			
Impact 5.17-3: Water facilities would not be able to accommodate project-generated utility demands.	Potentially significant.	Mitigation Measures USS-1 described above.	Less than significant with incorporation of Mitigation Measure USS-1.
Impact 5.17-4: Available water supplies are sufficient to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.	Less than significant.	No mitigation required	Less than significant.
Storm Drainage Systems			
Impact 5.17-5: Existing storm drain facilities would be not able to accommodate project-generated storm water flows and would require or result in the relocation or construction of new or expanded stormwater drainage systems.	Potentially significant.	**USS-2** Prior to the start of construction, the ACUSD shall prepare site-specific pre- and post- development runoff calculations and drainage plans for the Argonaut HS and Ione Junior HS to analyze the proposed improvements at these sites. The pre- and post- development runoff calculations and drainage plans shall include: • Detailed pre- and post-development runoff calculations and drainage plans to appropriately size drainage improvements (e.g., storm drains, inlets, and pipes) to meet the statewide Construction General Permit (GCP) post-construction requirements. This requires the ACUSD to use non-structural or structural measures to match pre-construction runoff rates for the 85th percentile, 24-hour storm event. The analysis shall also determine the capacity of the existing storm drain systems and any impacts from the proposed improvements. The school sites would be required to comply with storm drain design standards enacted by the cities of Jackson and Ione. • The storm drain infrastructure studies for Argonaut HS and Ione Junior HS shall be submitted to the Public Works Departments of the cities of Jackson and Ione, respectively, for review and approval. The California Department of Transportation, District 10 shall also review and approve the drainage analysis for Ione Junior HS. No grading permits shall be issued until the storm	Potentially significant.

Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
		drain design for each school site has been approved and storm drain upgrades or improvements have been approved, if necessary.	
Solid Waste			
Impact 5.17-6: Project-generated solid waste would not be 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.	No mitigation required	Less than significant.
Impact 5.17-7: Project-generated solid waste would comply with federal, state, and local management and reduction statutes and regulations related to solid waste.	Less than significant.	No mitigation required	Less than significant.
Other Utilities			
Impact 5.17-1: Existing facilities would be able to accommodate project-generated utility demands for electricity, natural gas, and telecommunications.	Less than significant.	No mitigation required	Less than significant.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.
5.28 WILDFIRE			
Impact 5.18-1: Implementation of the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan.	Less than significant.	No mitigation required	Less than significant.
Impact 5.18-2: The proposed project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, thereby exposing project occupants to elevated particulate concentrations from a wildfire.	Less than significant.	No mitigation required	Less than significant.

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Table 1-1 Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation

Environmental Impact	Level of Significance Before Mitigation	Mitigation Measures	Level of Significance After Mitigation
Impact 5.18-3: The proposed project would not require the installation and maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) and therefore would not exacerbate fire risk or result in temporary or ongoing impacts to the environment.	No Impact.	No mitigation required.	No Impact.
Impact 5.18-4: The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, postfire slope instability, or drainage changes.	Less than significant.	No mitigation required	Less than significant.
Cumulative Impact	Less than significant.	No mitigation required	Less than significant.

2. Introduction

2.1 PURPOSE OF THE ENVIRONMENTAL IMPACT REPORT

The California Environmental Quality Act (CEQA) requires that all state and local governmental agencies consider the environmental consequences of projects over which they have discretionary authority before taking action on those projects. This Draft Environmental Impact Report (DEIR) has been prepared to satisfy CEQA and the CEQA Guidelines for the School Closure/Consolidation Program Project (proposed project). An EIR is a public informational document that provides decision makers and the public with an analysis of the environmental effects of a project, to indicate ways to reduce or avoid environmental impacts, and to identify alternatives to the project. The EIR must also disclose significant environmental impacts that cannot be avoided; growth inducing impacts; effects not found to be significant; and significant cumulative impacts of past, present, and reasonably foreseeable future projects. Compliance with CEQA applies to California government agencies at all levels: local, regional, and state agencies, boards, commissions, and special districts (such as school districts and water districts).

The lead agency means "the public agency which has the principal responsibility for carrying out or approving a project which may have a significant effect upon the environment" (Public Resources Code [PRC] Section 21067). The Amador County Unified School District (ACUSD or District) is the public agency with principal responsibility for approval of the proposed project. For this reason, the ACUSD is the CEQA lead agency for this project.

The intent of the DEIR is to provide sufficient information regarding the potential environmental impacts of the proposed project to allow the ACUSD to make an informed decision regarding approval of the project. Specific discretionary actions to be reviewed by the District are described in Section 3.4, *Intended Uses of the EIR*.

This DEIR has been prepared in accordance with requirements of the:

- California Environmental Quality Act (CEQA) of 1970, as amended (PRC Section 21000 et seq.)
- State Guidelines for the Implementation of the CEQA of 1970 (CEQA Guidelines), as amended (California Code of Regulations, Section 15000 et seq.)

The overall purpose of this DEIR is to inform the lead agency, responsible agencies, decision makers, and the general public about the environmental effects associated with implementation of the proposed project. This DEIR identifies effects that may be significant and adverse, identifies mitigation measures to reduce or avoid those identified adverse effects and evaluates alternatives to the proposed project.

2.2 SCOPING PROCESS

The ACUSD determined that the proposed project could result in potentially significant environmental effects, and therefore an EIR would be required. Accordingly, as required by CEQA Guidelines Section 15375, the District, as lead agency, sent a Notice of Preparation (NOP) to responsible agencies, trustee agencies, and the Office of Planning and Research that the lead agency plans to prepare an EIR for the proposed project. The purpose of the notice is to solicit information, guidance, and recommendations regarding the scope, focus, and content of the DEIR.

The ACUSD issued the NOP on June 21, 2023 (see Appendix A). It identified the project sites, provided a summary of the proposed project, and identified the environmental topics that would be reviewed in the Draft EIR for the proposed project. The NOP was circulated to responsible and trustee agencies; Native American tribes; and District students, staff, and parents. The NOP was also made available for public review at multiple locations; published twice in the *Ledger Dispatch* (newspaper) during the public review period on June 23, 2023 and June 30, 2023; and posted on the District's website at https://amadorcoe.org/departments/business/facilities-projects/. The NOP was also filed with the County Clerk and the State Clearinghouse.

The NOP public review period began June 21, 2023, and concluded July 20, 2023. The District received 11 comments in response to the NOP, which are in Appendix B. The comments addressed issues related to cultural and tribal resources, transportation, hydrology, biological resources, water and wastewater utilities, public services, stormwater, and air quality (see Appendix B). Information received during the NOP scoping process has been incorporated into this DEIR and considered in the technical analysis.

2.3 SCOPE OF THIS DEIR

The scope of the DEIR was finalized based on the comments received in response to the NOP and at the scoping meeting conducted by the District. Pursuant to Sections 15126.2 and 15126.4 of the CEQA Guidelines, the DEIR should identify any potentially significant adverse impacts and recommend mitigation that would reduce or eliminate these impacts to levels of insignificance.

The information in Chapter 3, *Project Description*, establishes the basis for analyzing future, project-related environmental impacts. However, further environmental review by the District may be required as more detailed information and plans are submitted.

2.3.1 Impacts Considered Less Than Significant

During preparation of the NOP, ACUSD determined that two environmental impact categories were not significantly affected by or did not affect the proposed project. These categories are not discussed in detail in this DEIR.

- Agriculture and Forestry Resources
- Mineral Resources

2.3.2 Potentially Significant Adverse Impacts

The ACUSD determined that further analysis was needed of 18 environmental factors to determine whether the proposed project would result in potentially significant impacts. These topics are evaluated in detail in Chapter 5, *Environmental Analysis*, of this DEIR.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology and Soils
- Greenhouse Gas Emissions
- Hazards and Hazardous Materials
- Hydrology and Water Quality
- Land Use and Planning
- Noise
- Population and Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities and Service Systems
- Wildfire

2.3.3 Unavoidable Significant Adverse Impacts

This DEIR identifies significant and unavoidable adverse impacts related to cumulative operational traffic noise and vehicle miles traveled that would result from implementation of the proposed project. Unavoidable adverse impacts may be considered significant on a project-specific basis, cumulatively significant, and/or potentially significant. The lead agency (i.e. the District) must prepare a "statement of overriding considerations" before it can approve the project, attesting that the decision-making body has balanced the benefits of the proposed project against its unavoidable significant environmental effects and has determined that the benefits outweigh the adverse effects, and therefore the adverse effects are considered acceptable. The impacts that were found in the DEIR to be significant and unavoidable are:

- **Cumulative Traffic Noise:** Operation of the proposed project in combination with cumulative projects would be expected to combine to exceed applicable noise thresholds and create a cumulative operational traffic noise impact. Implementation of Mitigation Measure T-1 and the continued implementation of the District's bus program would reduce the proposed project's contribution to cumulative traffic noise; however, impacts would remain signific

- **Impact 5.15-2:** Implementation of the proposed project would increase vehicle miles travels per student. Implementation of Mitigation Measure T-1 would reduce vehicle miles traveled to the extent feasible; however, impacts would remain significant.

- **Cumulative Vehicle Miles Traveled:** The proposed project's proposed increase in vehicle miles traveled would result in a cumulatively considerable impact. Implementation of Mitigation Measure T-1 would reduce vehicle miles traveled to the extent feasible; however, impacts would remain significant.

2.4 INCORPORATION BY REFERENCE

Some documents are incorporated by reference into this DEIR, consistent with Section 15150 of the CEQA Guidelines, and they are available for review at the designated websites.

- County Code, County of Amador County, 2023
  https://www.codepublishing.com/CA/AmadorCounty/

- General Plan, City of Ione, August 2009
  chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.ione-ca.com/media/1071

- General Plan and General Plan Update, City of Jackson, 2008 and 2023
  https://www.ci.jackson.ca.us/planning_department.php

- Municipal Code, City of Jackson
  https://library.qcode.us/lib/jackson_ca/pub/municipal_code

- General Plan, City of Sutter Creek, July 2019
  https://cityofsuttercreek.org/sutter-creek-planning-building/

- General Plan, County of Amador County, 2016
  https://www.amadorgov.org/departments/planning/general-plan-update-draft-environmental-impact-report-and-draft-general-plan

- *Facilities Utilization Master Plan,* Amador County Unified School District*,* 2022
  https://amadorcoe.org/departments/business/facilities-projects/

2.5 FINAL EIR PROCESS

This DEIR is being circulated for a 45 day-review period, from Friday, December 15, 2023, to Monday, January 29, 2023. Interested agencies and members of the public are invited to provide written comments on the DEIR to ACUSD at the address and/or email shown below.

In compliance with Sections 15085(a) and 15087(a)(1) of the CEQA Guidelines, the ACUSD, serving as the lead agency, has published the Notice of Availability (NOA), which indicates that the DEIR and all associated technical appendices can be viewed at:

- ACUSD Office
  217 Rex Avenue
  Jackson, CA 95642

In addition, the DEIR is available online at the ACUSD website:
https://amadorcoe.org/departments/business/facilities-projects/

The notice of completion (NOC) and NOA has been transmitted to the State Clearing House and Amador County Clerk and distributed to District staff, students and parents, and/or those who have previously requested such notice. Any public agency or members of the public wishing to comment on the DEIR must submit their comments in writing or send them via email with the subject heading "School Closure/Consolidation Program Project" to the following addresses before the end of the public review period:

- **Mail:** Jared Critchfield, Deputy Superintendent
  Amador County Unified School District
  217 Rex Avenue
  Jackson, California 95642

- **Email:** CEQAcomments@acusd.org

Upon completion of the 45-day review period, the ACUSD will review all written comments received and prepare written responses for each. The Final EIR (FEIR) will include all received comments, the ACUSD's responses to those comments, and any changes to the DEIR that result from comments. The FEIR will be presented to the ACUSD's Board of Education for potential certification as the environmental document for the proposed project. All persons who comment on the DEIR will be notified of the availability of the FEIR and the date of the public hearing.

2.6 MITIGATION MONITORING

PRC Section 21081.6 requires that agencies adopt a Monitoring and Reporting Program (MMRP) for any project for which it has made findings pursuant to PRC Section 21081. Such a program is intended to ensure the implementation of all mitigation measures adopted through the certification of the EIR.

The MMRP for the proposed project will be completed as part of the Final EIR, before consideration of the proposed project by the District's Board of Education.

2. Introduction

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3. Project Description

3.1 PROJECT LOCATION

3.1.1 Regional Location

Amador County Unified School District (ACUSD or District) is the only public school district serving Amador County. The county is located approximately 45 miles southeast of Sacramento in the Sierra Nevada Mountain Range. The county is surrounded by El Dorado County to the north, Alpine County to the east, Calaveras County to the south, San Joaquin County to the southwest, and Sacramento County to the west. The northeast portion of the county is within The Eldorado National Forest.

3.1.2 Project Site

The proposed project would affect eight of ACUSD's school campuses: Amador High School (HS), Argonaut HS, Ione Junior HS, Jackson Junior HS, Ione Elementary School (ES), Jackson ES, and Sutter Creek ES.[1] Figure 3-1, *Location Map and Existing Conditions,* shows the eight campuses in their regional and local contexts.

Amador High School

Amador HS is located at 330 Spanish Street, Sutter Creek, California, 95685, in the northern part of the city. The site has an Assessor's Parcel Number (APN) of 018-020-029-000. It is approximately 0.3 miles east of State Route 49 (SR 49) and is immediately south of Sutter Creek ES.

Argonaut High School

Argonaut HS is located at 501 Argonaut Lane, Jackson, California, 95642, in the northwest corner of the city. The site has an APN of 044-100-009-000. It is approximately 0.47 miles west of State Route 88 (SR 88) and 0.5 miles south of SR 49. Sutter Creek is located approximately 0.2 miles south of the campus.

Ione Junior High School

Ione Junior HS is located at 450 South Mills Street, Ione, California, 95640, in the southern part of the city. The site has an APN of 004-250-001-000. It is approximately 0.08 miles west of State Route 124 (SR 124) and approximately 0.18 miles south of Dry Creek. This campus is approximately 0.17 miles east of Ione ES.

[1] Sutter Creek ES has two campuses.

3. Project Description

Jackson Junior High School

Jackson Junior HS is located at 747 Sutter Street, Jackson, California, 95642, in the western part of the city. The site has an APN of 020-161-001-000. It is approximately 0.09 miles west of SR 88 and approximately 0.3 miles north of Jackson Creek.

Ione Elementary School

Ione ES is located at 415 South Ione Street, Ione, California, 95640, in the southern part of the city. The site as an APN of 004-261-002-000. It is directly west of State Route 104 (SR 104) and approximately 0.15 miles east of SR 124. This campus is 0.17 miles east of Ione Junior HS.

Jackson Elementary School

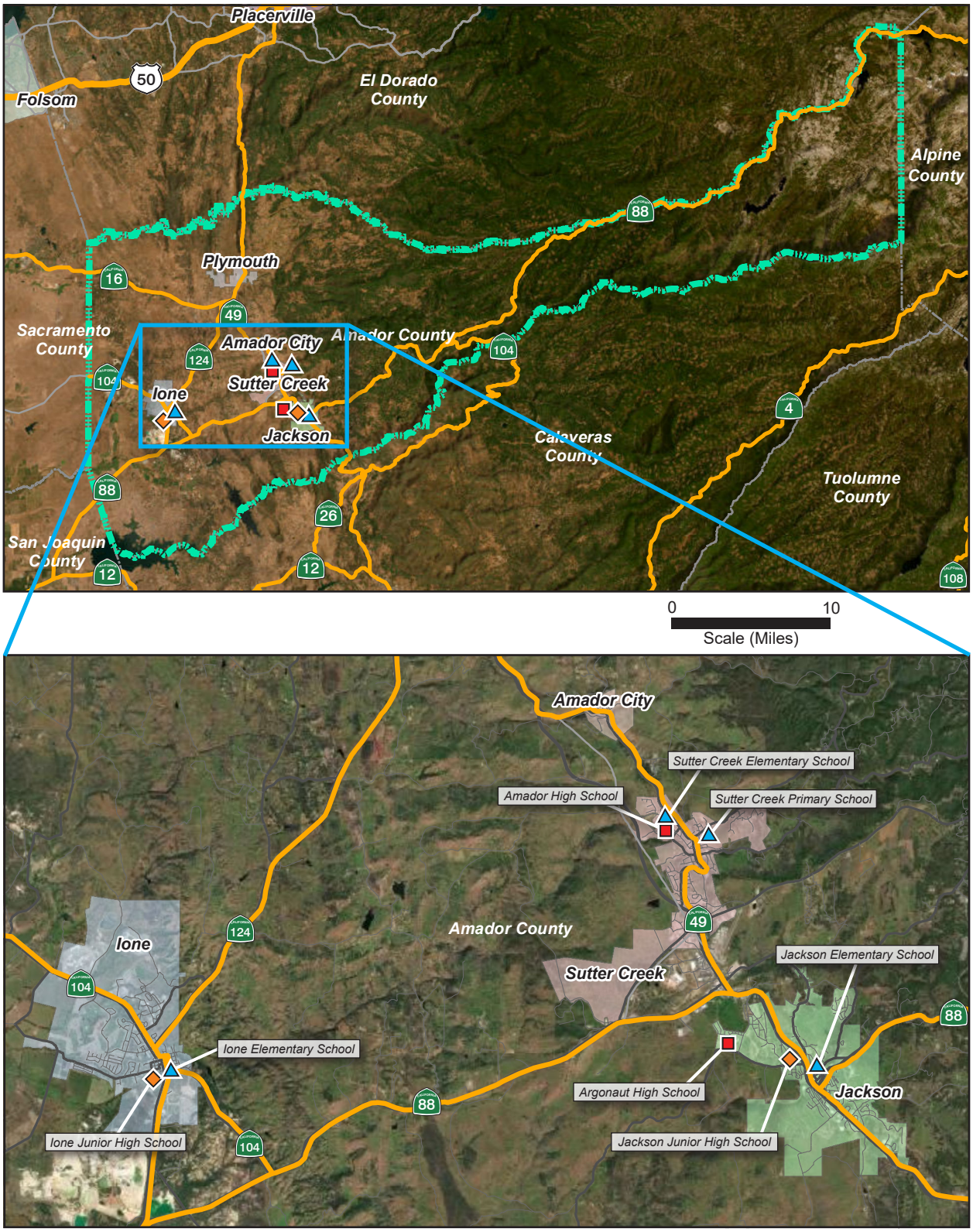
Jackson ES is located at 220 Church Street, Jackson, California, 95642, in the center of the city. The site has an APN of 020-198-017-000. It is approximately 0.14 miles east of SR 49 and approximately 0.2 miles west of SR 88. Jackson Creek is located approximately 0.2 miles south of the campus.

Sutter Creek Elementary School

Sutter Creek ES has two campuses. One is located at 340 Spanish Street, Sutter Creek, California, 95685, in the northern part of the city and directly north of Amador HS. This site has an APN of 018-020-030-000. It is approximately 0.3 miles east of SR 49. The other campus is located at 110 Broad Street, Sutter Creek, California, 95685 with an APN of 018-133-009-000. It is approximately 0.5 miles southeast of Amador HS and the Spanish Street location. This campus is approximately 0.75 miles east of SR 49.

Figures 3-2a through 3-2c show the existing attendance boundaries for ACUSD.

Figure 3-1 - Location Map and Existing Conditions



Note: District schools not included on the maps will have no change.

Source: Generated using ArcMap 2023.

3. Project Description

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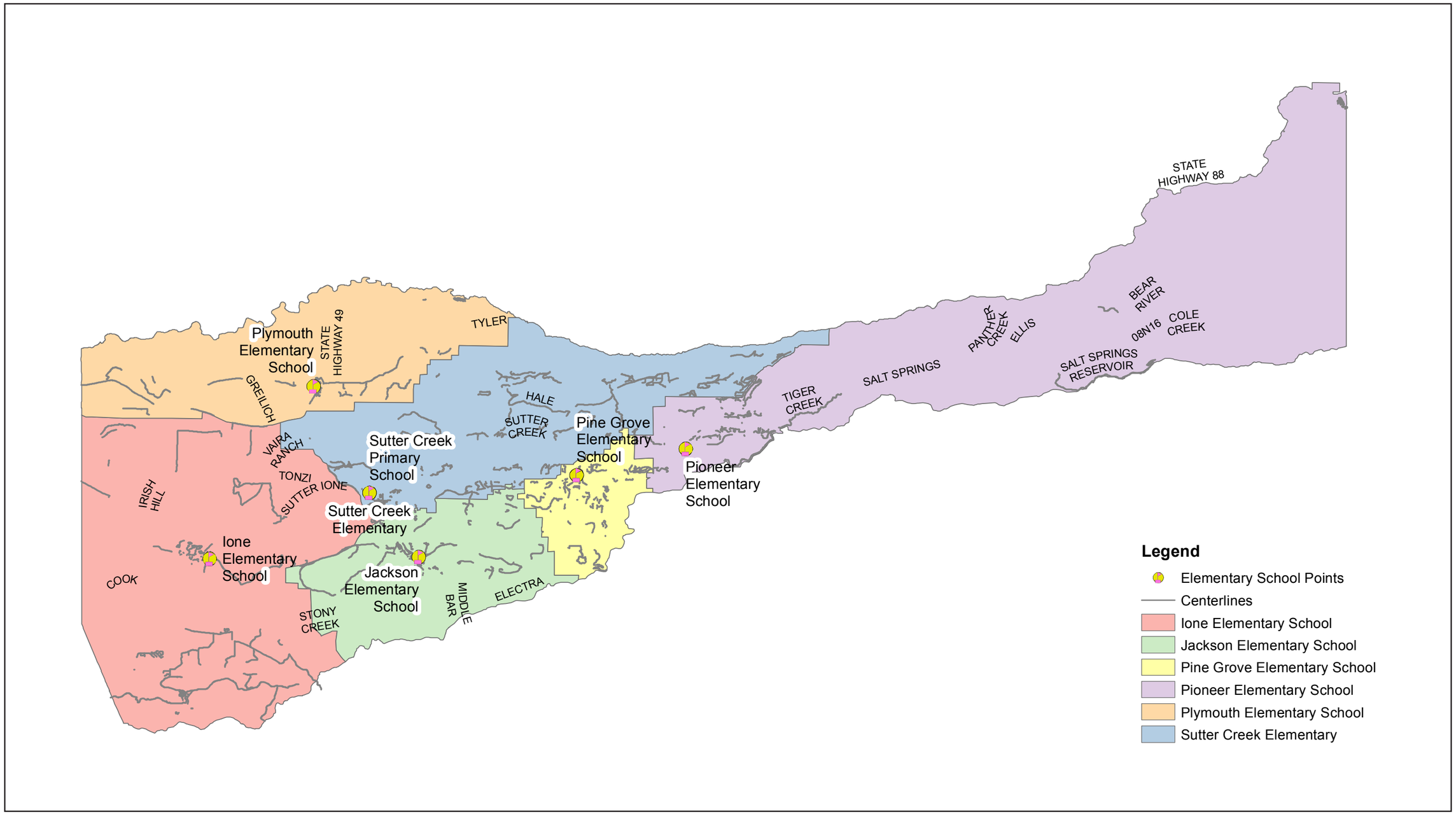
Figure 3-2a - Existing Elementary School Boundaries



Source: ACUSD 2022.

3. Project Description

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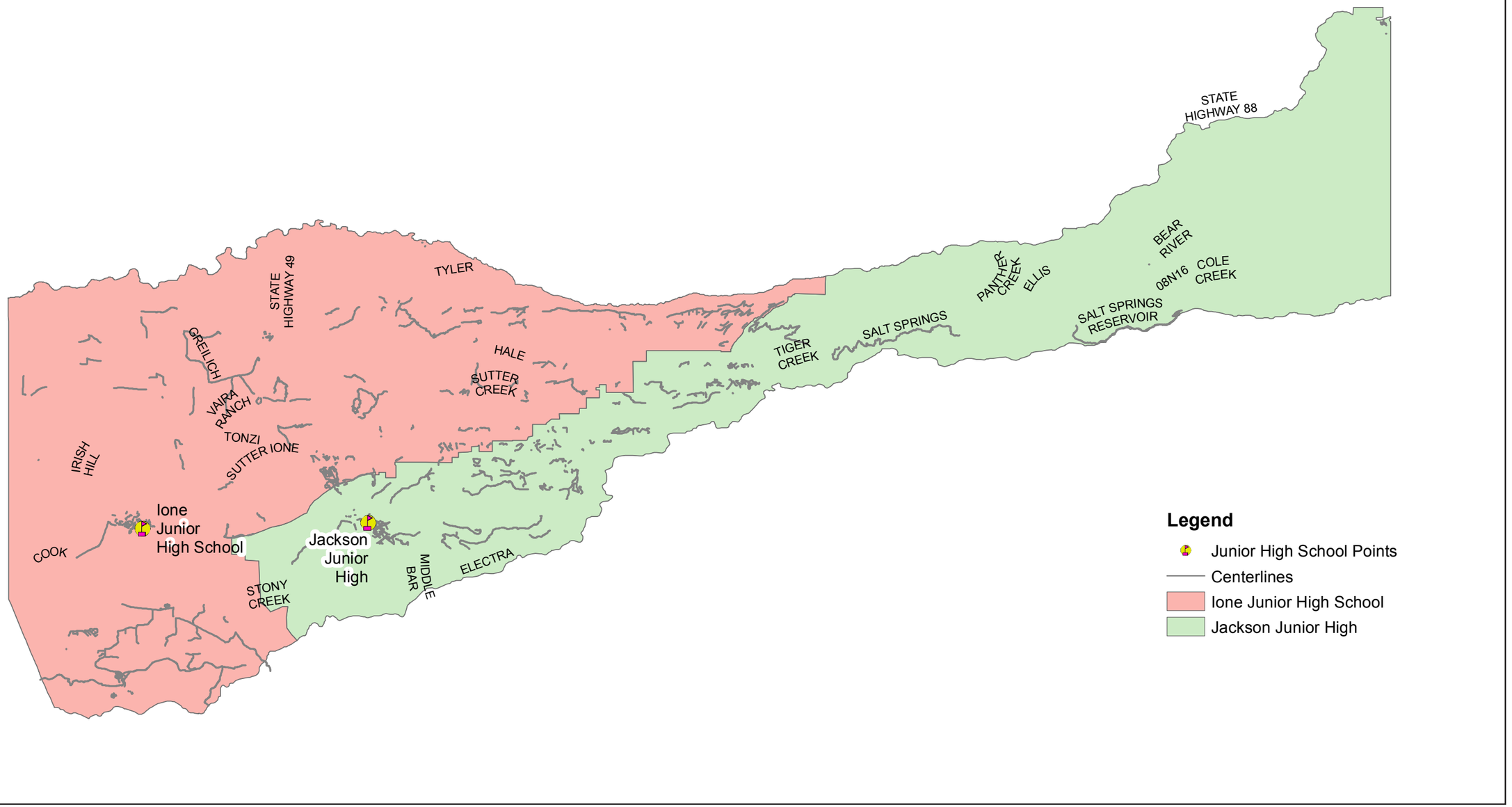
Figure 3-2b - Existing Junior High School Boundaries



Source: ACUSD 2022.

3. Project Description

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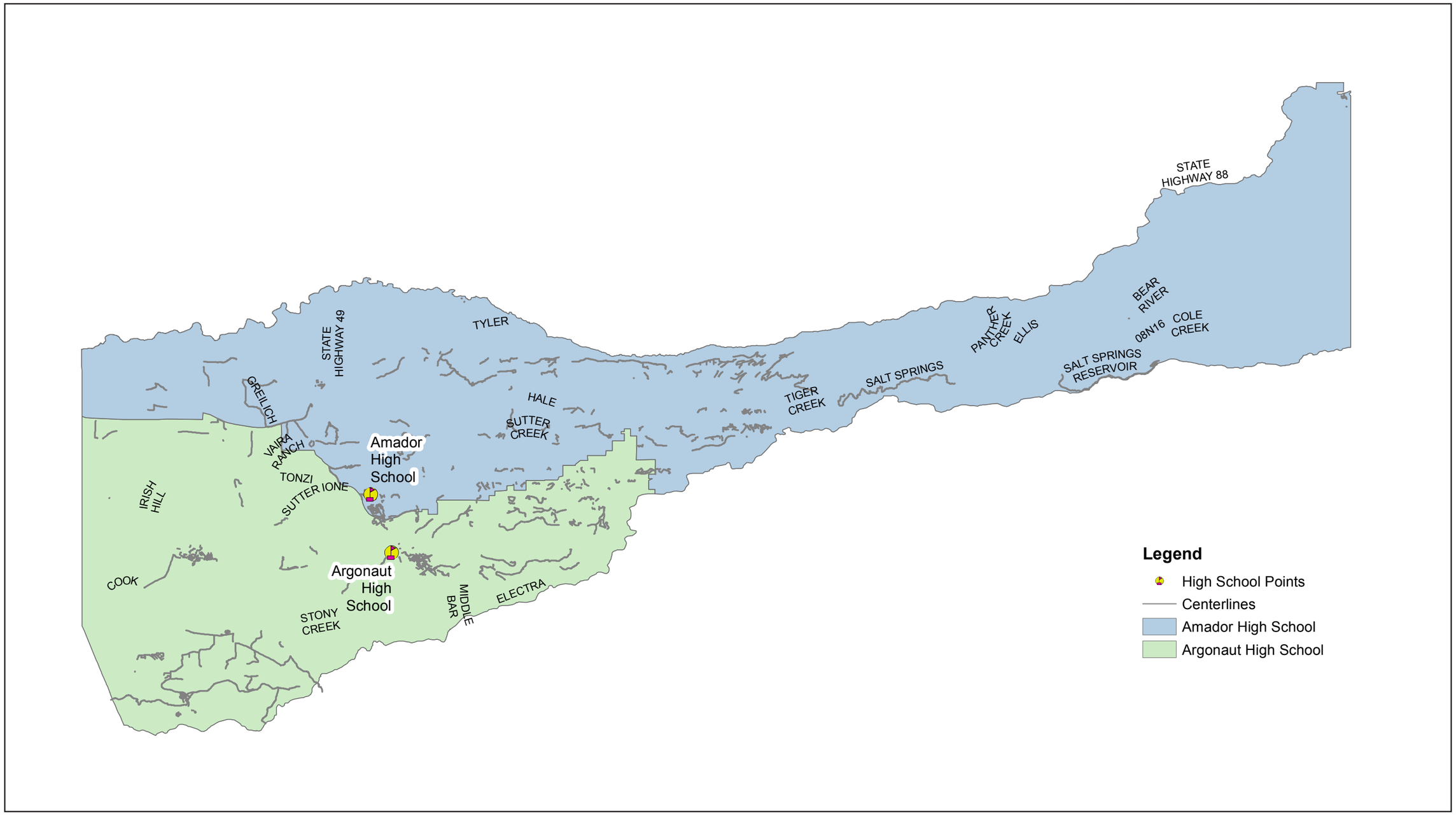
Figure 3-2c - Existing High School Boundaries



Source: ACUSD 2022.

3. Project Description

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3.1.3 Existing Zoning and Land Uses

In the City of Sutter Creek, Amador HS and both locations of Sutter Creek ES School are currently zoned as Public Service (P-S) with a land use designation of Public Service (PS) (Sutter Creek 2019a, 2019b). In the City of Jackson, Argonaut HS, Jackson Junior HS, and Jackson ES are all zoned and have a land use designation of Public (Jackson 2014). Currently, the City of Jackson is in the process of adopting a General Plan Update. Argonaut HS, Jackson Junior HS, and Jackson ES are all zoned and have a land use designation of Public (P) (Jackson 2023.) In the City of Ione, Ione Junior HS and Ione ES are zoned as Public Facilities (PF) with a land use designation of Public Service (PS) (Ione 2009, 2018).

Each campus is developed with school/academic uses. A description of each campus is provided below.

Amador High School

Amador HS is developed with and operates as a high school campus with 19 buildings (includes a combination of permanent and relocatable buildings). The buildings include various classrooms, gymnasium, cafeteria/arts & crafts, administration, and library (ACUSD 2022). The campus also includes four tennis courts, pool, two baseball fields, one softball field, one sports field with track and field, lawn areas, and surface parking lots. The buildings, pool and tennis courts are located on the east side of the campus; the sport fields are located on the west side of campus. Primary access to the campus is provided from Spanish Street and Sutter Ione Road. The campus is partially fenced.

Argonaut High School

Argonaut HS campus located at 501 Argonaut Lane is developed with 28 buildings (combination of permanent and portable buildings) that include library/classrooms, office, gymnasium, and storage (ACUSD 2022). The campus also includes four tennis courts, one baseball field, two softball fields, one sports field with track and field, lawn areas, and surface parking lots. The buildings, surface parking lots and tennis courts are located on the east side of the campus; the sport fields are located on the west side of campus. Current access to Argonaut HS is by Argonaut Lane, northeast of Stony Creek Road, that connects to SR 88. The campus has a parking lot near the front of the campus, adjacent to Argonaut Lane and one behind the main campus, closer to the athletic fields. The campus is partially fenced.

Ione Junior High School

Ione Junior HS campus located at 450 Mills Street is developed with 18 buildings (combination of permanent and portable buildings) that include multi-purpose building, library/classrooms, office, gymnasium, and band (ACUSD 2022). The campus also includes one baseball field, a track and field, pool, lawn areas, outdoor fitness and play area, and surface parking lots. The buildings, surface parking lots, pool and outdoor fitness area are located on the east side of the campus; the sport fields are located on the west side of campus. The campus can be accessed from South Mills Street and Sacramento Street, with parking lots available from both streets. The campus is partially fenced.

Jackson Junior High School

Jackson Junior HS campus located at 333 Rex Avenue is developed with 17 buildings (combination of permanent and portable buildings) that include administration/classrooms, gymnasium, and kitchen (ACUSD 2022). The campus also includes one sport field and surface parking lots. The buildings and surface parking lots are located on the northeast side of the campus; the sport field is located on the west side of campus. The campus can be accessed from Sutter Street, Rex Avenue and CA-88, with parking lots available from all streets. The campus is partially fenced.

Ione Elementary School

Ione ES campus located at 415 S. Ione Street is developed with 28 buildings (combination of permanent and portable buildings) that include administration/classrooms, library, band room and platform, and multi-purpose and kitchen (ACUSD 2022). The campus also includes one sport field, two outdoor playgrounds and hardtop play areas, and a surface parking lot. The buildings, hardtop play areas, and surface parking lot are located on the west side of the campus; the sport field is located on the east side of campus. The campus can be accessed from Ione Street, which directly connects to CA-104. The campus is partially fenced.

Jackson Elementary School

Jackson ES campus located at 220 Church Street is developed with 12 buildings (combination of permanent and portable buildings) that include classrooms, multi-purpose building, and library ACUSD 2022). The campus also includes one sport field, two outdoor playgrounds, two basketball courts and hardtop play areas, lawn areas. The buildings and one playground are located on the east side of the campus; the sport field, basketball courts and sport field is located on the west side of campus. The campus can be accessed from Church Street. The campus is fenced.

Sutter Creek Elementary School

Sutter Creek ES includes two campuses as described above; both campuses are developed with and operate as an elementary school campus.

Sutter Creek ES campus located at 340 Spanish Street is developed with 9 buildings (combination of permanent and portable buildings) that include classrooms, office, and storage (ACUSD 2022). The campus also includes a playground and hardtop play spaces on the west side of the campus, and two surface parking lots on the east side and south side of the campus. Primary access to Sutter Creek ES is provided from Spanish Street and Sutter Ione Road. The campus is fenced.

Sutter Creek Primary located at 110 Broad Street is developed with six buildings (combination of permanent and portable buildings) that includes classrooms, administration, library, and community building (ACUSD 2022). The campus also has a lawn area, two playgrounds, and two hardtop play areas. Access to Sutter Creek Primary is provided from Broad Street, Cole Street, and Fullen. The campus is partially fenced.

3.1.4 Surrounding Land Uses

Amador High School

Amador HS is mainly surrounded by residential properties with the land use designation of Residential Single Family (RSF) and zoning of One Family Dwelling (R-1) to the north, east, and south. Commercial properties to the east have a land use designation of Commercial (C) and zoning of Commercial (C-2). Sutter Creek ES campuses is located directly north with a land use designation of Public Service (PS) and zoning of Public (P). More residential properties are located to the west of Oro Madre Way with the land use designation of Residential Low Density (RL) and zoning of Residential Low Density (R-L) with a Planned Development Overlay (Sutter Creek 2019a, 2019b).

Argonaut High School

The west and south sides of Argonaut HS represent the city limits. Residential properties located directly north have a land use designation and zoning of Residential Single Family, Residential Low Density, and Residential Medium Density. Land east of Argonaut Lane, including the Amador Superior Court and County Amador County Grand Jury, have a land use designation and zoning of Professional Office. More residential uses are located further east with a land use designation and zoning of Residential Single Family (Jackson 2014).

Based on the City's General Plan Update, residential properties located directly north have a land use designation and zoning of Residential Single Family (RSF), Residential Duplex (RD), and Residential Medium Density (RM). Land east of Argonaut Lane, including the Amador Superior Court and County Amador County Grand Jury, have a land use designation and zoning of Professional Office (PO) with a Planned Development Overlay. More residential uses are located further east with a land use designation and zoning of Residential Single Family (RSF) (Jackson 2023).

Ione Junior High School

Residential properties directly north of Ione Junior HS have a land use designation of Low Density Residential (RL) and a zoning of One Family (6.7 du/ac max) (R-1b) and Limited Multiple Family (14.5 du/ac max) (R-2). Land to the southwest have a land use designation of Special Planning Area (SPA) and a zoning of Heavy Industrial and Mining (M-2), Limited Manufacturing and Industrial (M-1), and Heavy Commercial (C-3). There is a small portion of commercial properties with a land use designation of General Commercial (GC) and zoning of Heavy Commercial (C-3) to the east of the campus (Ione 2009, 2018).

Jackson Junior High School

Residential properties to the south and west of Jackson Junior HS campus have a land use designation and zoning of Residential Single Family. Residential properties to the northwest of campus have a land use designation and zoning of Residential High Density, Residential Medium Density, and Professional Office. Commercial properties located north, beyond Sutter Street, have a land use designation and zoning of Limited Commercial and Commercial. Land to the east, bordering SR 88, has a land use designation and zoning of Commercial and Recreation for Detert Park (Jackson 2014).

Based on the City's General Plan Update, residential properties to the south and west of Jackson Junior HS campus have a land use designation and zoning of Residential Single Family (RSF). Residential properties to the northwest of campus have a land use designation and zoning of Residential High Density (RH), Residential Medium Density (RDM), and Professional Office (PO). Commercial properties located north, beyond Sutter Street, have a land use designation and zoning of Limited Commercial (LC) and Commercial (C). Land to the east, bordering SR 88, has a land use designation and zoning of Commercial (C) and Open Space (OS) (Jackson 2023).

Ione Elementary School

Land directly north of Ione ES campus has a land use designation of Downtown Transition (DT) and zoning of Commercial Transition (C-T). The land to the east have a land use designation of High Density Residential (RH) and zoning of Planned Development (PD). Properties northeast of the campus, south of Foothill Boulevard, have a land use designation of General Commercial (GC) and zoning of Heavy Commercial (C-3). Open land directly south of campus have a land use designation of Parks and Rec (PR) and zoning of Parks and Community Services (PCS). Commercial properties to the west have a land use designation of General Commercial (GC) and zoning of Heavy Commercial (C-3) and Commercial Transition (C-T) (Ione 2009, 2018).

Jackson Elementary School

Properties to the west, including Amador County Museum, have a land use designation and zoning of Public. Land to the north has a land use designation and zoning of Professional Office. Properties to the east and south of campus have a land use designation and zoning of Historic Commercial (Jackson 2014).

Based on the City's General Plan Update, properties to the west, including Amador County Museum, have a land use designation and zoning of Public (P). Land to the north has a land use designation and zoning of Residential Single Family (RSF) and Professional Office (PO). Properties to the east and south of campus have a land use designation and zoning of Historic Commercial (HC) in the Historic District Overlay (Jackson 2023).

Sutter Creek Elementary School

Sutter Creek ES is mainly surrounded by residential properties with the land use designation of Residential Single Family (RSF) and zoning of One Family Dwelling (R-1) to the north, east, and south. Commercial properties to the east have a land use designation of Commercial (C) and zoning of Commercial (C-2). Amador HS campus is located directly south with a land use designation of Public Service (PS) and zoning of Public (P). More residential properties are located to the west of Oro Madre Way with the land use designation of Residential Low Density (RL) and zoning of Residential Low Density (R-L) with a Planned Development Overlay (Sutter Creek 2019a, 2019b).

3.2 STATEMENT OF OBJECTIVES

Objectives for the School Closure/Consolidation Program Project will aid decision makers in their review of the project and associated environmental impacts:

- Enhance educational opportunities, counseling, and other support services by focusing resources on fewer facilities.
- Maintain District financial stability by consolidating resources for efficient program administration.
- Address enrollment fluctuations by consolidating schools and closing two schools.

3.3 PROJECT CHARACTERISTICS

"Project," as defined by Public Resources Code Division 13, Section 21065, means:

> ... an activity which may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment, and which is any of the following: (a) An activity directly undertaken by any public agency.

3.3.1 Description of the Project

ACUSD is proposing to consolidate eight school campuses onto six current ACUSD campuses. This would require physical site improvements at three campuses: Argonaut HS, Ione Junior HS, and Sutter Creek ES; the closure of Ione ES and Sutter Creek Primary School, Sutter Creek ES's second campus, for later disposition; and the creation of a county preschool. See Figure 3-3, *Proposed School Closure/Consolidation Program*, which shows how the schools would be reconfigured.

The proposed project would not change the elementary school attendance boundaries. The proposed project would change the junior high school boundaries and the high school boundaries (see Figures 3-4a, *Proposed Junior High School Boundaries*, and 3-4b, *Proposed High School Boundaries*, respectively).

School Closure/Consolidation Program

The District proposes to combine Amador HS and Argonaut HS at Argonaut HS. This would change the enrollment capacity from 925 students to 1,325 students and would continue to serve grades 9 through 12. The number of teaching stations would increase from 37 to 53. This campus would require site improvements to accommodate the increase in enrollment (further discussed below).

The District proposes to combine Ione Junior HS and Jackson Junior HS at Amador HS. This change would not affect the enrollment capacity (875 students) of the campus nor the number of teaching stations 35 teaching stations). The campuses would serve grades 7 through 8 instead of grades 9 through 12. No building or site improvements are proposed at this campus.

The District proposes to relocate Ione ES to Ione Junior HS and would add pre-school and transitional kindergarten (TK) to the campus. This would change the enrollment capacity of the campus from 775 students serving grades 6 through 8 to 801 students serving preschool and grades TK through 6. Teaching stations would increase from 31 to 33 by adding 2 preschool/transitional kindergarten classrooms. This campus would require site improvements to accommodate the increase in enrollment (further discussed below).

3. Project Description

The District would convert Jackson Junior HS into the County Preschool Center. This would change the enrollment capacity and grade levels from 475 students of grades 6 through 8, to a potential maximum capacity of 195 preschool and TK students. The number of teaching stations would decrease from 19 to 15. Restrooms and fountains would be converted to have age-appropriate fixtures, but site improvements would not be required.

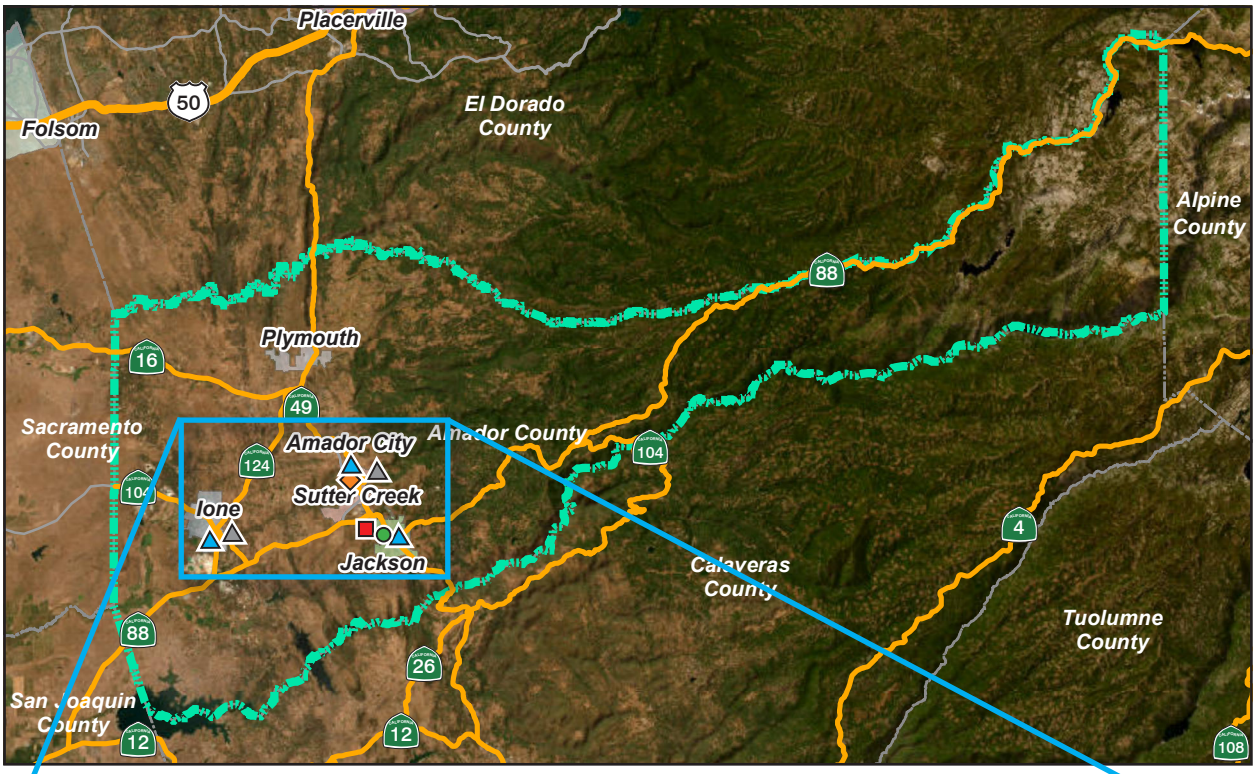
The District would add 6 grade to Jackson ES. The enrollment capacity of 575 students and 23 teaching stations would remain the same. No site improvements would be required at this campus.

The District would expand Sutter Creek ES to create a TK through 6 grade campus. This would increase the enrollment capacity from 325 students of grades TK through 2 to 625 students of grades TK through 6. The number of teaching stations would increase from 13 to 25. To accommodate the increase in students, site improvements would be required (further discussed below).

Sutter Creek Primary School (at 110 Board Street in the city of Sutter Creek) and Ione ES close for later disposition.

A summary of the proposed changes, including grade levels, student enrollment and capacity, and site improvements are shown in Table 3-1, *Proposed Campus Changes*. As part of the proposed project, each elementary and junior high school campus would have a campus supervisor that would oversee a valet program where campus personnel help load and unload students from vehicles and buses and control vehicles leaving the campus (metering) to allow for efficient circulation onto public streets. At the high school campus, the campus supervisor would meter vehicles leaving the campus during pick-up and drop-off times.

Figure 3-3 - Proposed School Closure/Consolidation Program



Amador County Unified School District
County Boundary

High School
Junior High School
Elementary School
Preschool
Closed Campus

0 3
Scale (Miles)

Note: District schools not included on the maps will have no change.

Source: Generated using ArcMap 2023.

3. Project Description

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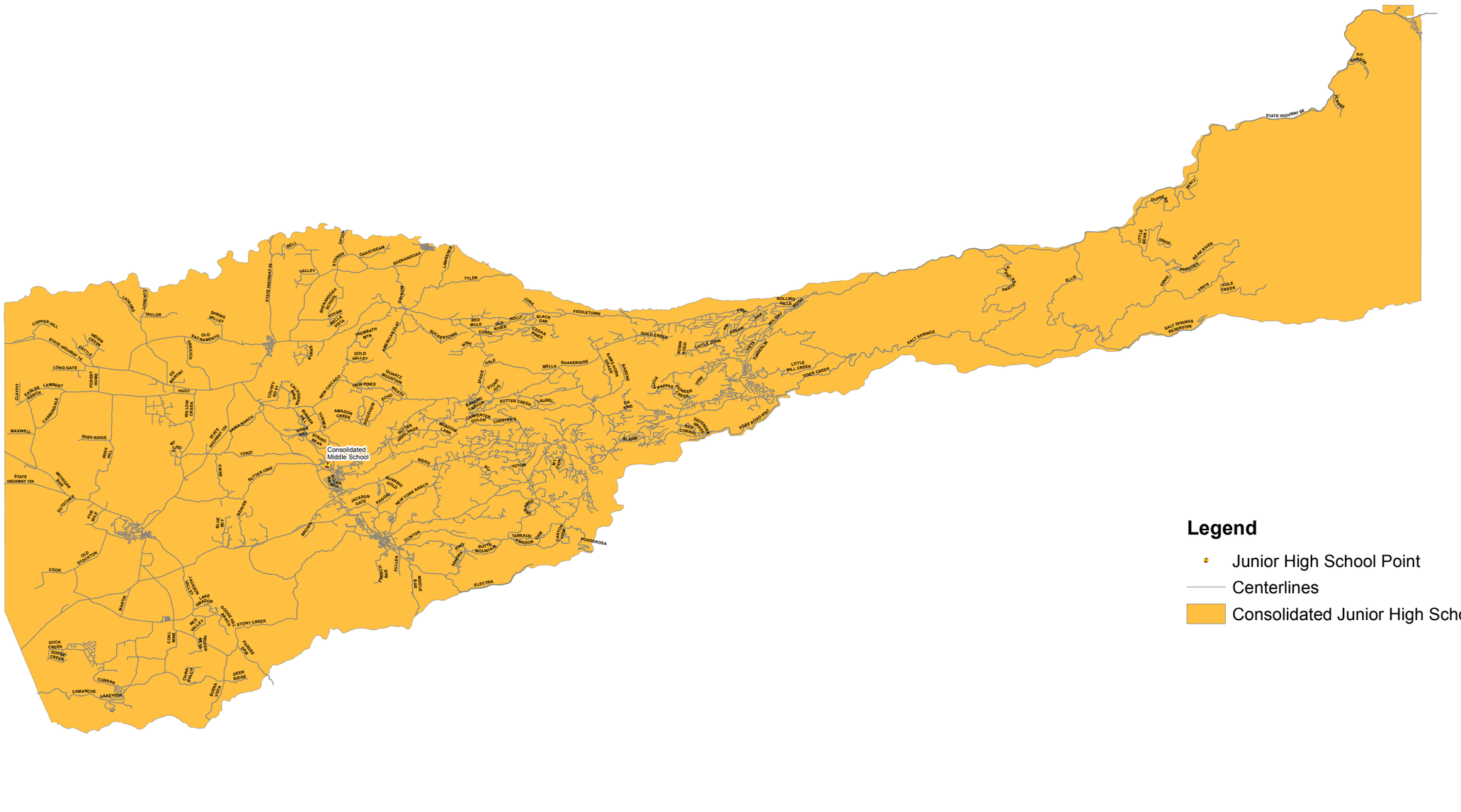
Figure 3-4a - Proposed Junior High School Boundaries



Source: ACUSD 2023.

3. Project Description

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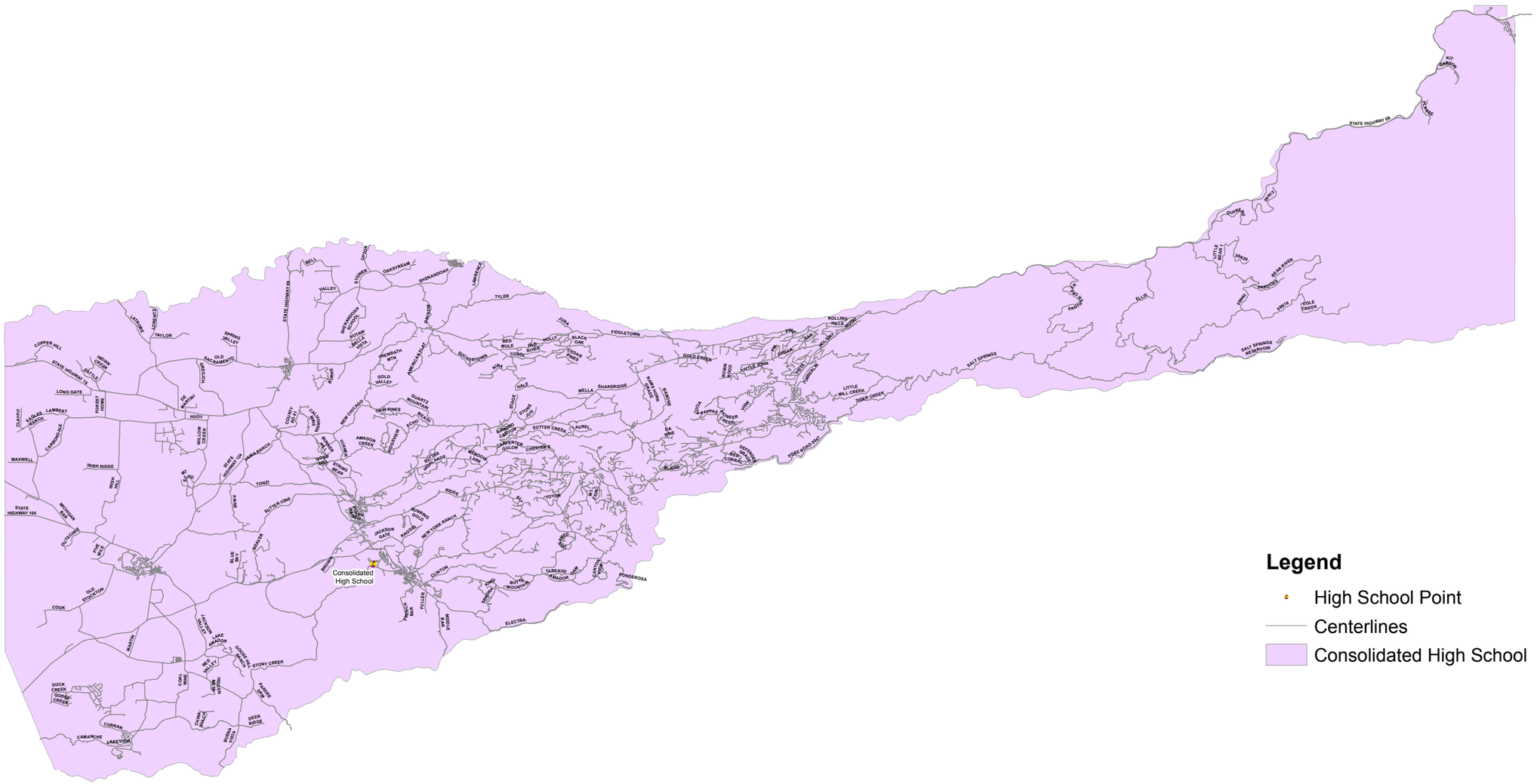
Figure 3-4b - Proposed High School Boundaries



Source: ACUSD 2023.

3. Project Description

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Table 3-1 Proposed Campus Changes

	Existing	Proposed
Amador High School **Proposed Action: Ione and Jackson Jr. High Schools Combine at Amador High School**		
Enrollment	702 students Grades 9-12	603 students Grades 7-8
Capacity	875 students Grades 9-12	875 students Grades 7-8
Teaching Stations	35	35
Argonaut High School **Proposed Action: Amador and Argonaut High Schools Combine at Argonaut High School**		
Enrollment	536 students Grades 9-12	1,263 students Grades 9-12
Capacity	925 students Grades 9-12	1,325 students Grades 9-12
Teaching Stations	37	53
Site Improvements		New 10-classroom 2-story building (with 4 science labs and 6 standard classrooms), Addition of portable office and 4 portable classrooms relocated from Jackson Jr. High School. Convert 2 preschool classrooms to regular classrooms. Convert classroom for counseling office. Kitchen renovation and expansion. Renovate and expand gymnasium locker rooms. New parent drop-off New access road connecting to Stony Creek Road. Accessibility Compliance throughout campus. (See Figure 3-5, *Argonaut High School Site Improvements*)
Ione Junior High School **Proposed Action: Ione Elementary School Moves to Ione Jr. High School, Accommodate Preschool and Transitional Kindergarten - Sixth Grade Students**		
Enrollment	393 students Grades 6-8	649 students Preschool, grades TK-6
Capacity	775 students Grades 6-8	801 students Preschool, grades TK-6
Teaching Stations	31	33
Site Improvements		New 2 classroom building and playground for preschool, TK and Extended Learning. Convert science labs into K classrooms. Convert restrooms to K restrooms. Kitchen expansion. Expanded parent drop-off/pick-up areas. Expanded kindergarten drop-off/pick-up areas. New play structure and hard court areas. 3,000 square feet of new lawn area (See Figure 3-6, *Ione Elementary School at Former Ione Junior High School Site Improvements*)

Table 3-1 Proposed Campus Changes

	Existing	Proposed
Jackson Junior High School **Proposed Action: Jackson Jr. High Becomes County Preschool Center**		
Enrollment	346 students Grades 6-8	41 students Preschool
Capacity	475 students Grades 6-8	195 students Preschool, TK grades
Teaching Stations	19	15
Site Improvements		Convert restrooms and fountains with age-appropriate fixtures
Jackson Elementary School **Proposed Action: Jackson Elementary School adds back Sixth Grade Students**		
Enrollment	500 students Grades TK-5	528 students Grades TK-6
Capacity	575 students TK-5 grades	575 students Grades TK-6
Teaching Stations	23	23
Sutter Creek Elementary School **Proposed Action: Sutter Creek Elementary School expands to create Transitional Kindergarten - Sixth Grade Campus**		
Enrollment	204 students [1] Grades 3-6	388 students Grades TK-6
Capacity	325 students Grades 3-6	625 students Grades TK-6
Teaching Stations	13	25
Site Improvements		New 12 classroom building includes lunch shelter (See Figure 3-7, *Sutter Creek Elementary School Site Improvements)*

Notes:
[1] Sutter Creek ES and Sutter Creek Primary campuses have an existing enrollment of 380 students and serve grades TK-6.

Argonaut High School Site Improvements

To accommodate the increase in students from combining Amador and Argonaut High Schools, site improvements would be required at the existing Argonaut HS campus. The District is proposing to add a two-story, ten-classroom building with four science labs and six standard classrooms totaling approximately 14,288 square feet, relocate a portable office and four portable classrooms totaling approximately 5,760 square feet from Jackson Junior HS to this campus, convert two preschool classrooms to regular classrooms totaling approximately 1,920 square feet, convert a classroom for counseling offices, a kitchen renovation and expansion totaling approximately 4,200 square feet, and renovate and expand gymnasium locker rooms, totaling approximately 3,400 square feet. The total new building or renovated square footage would be approximately 28,608 and a 21,464 square feet footprint. The proposed ten-classroom building would be all-electric. Additionally, 26,000 square feet of hardscape will be added. For these improvements, 27 trees would need to be removed ranging from a 4-inch diameter to a 36-inch diameter and 5,700 building square feet will be

demolished. The proposed project would also include accessibility compliance and fire lane improvements throughout campus.

The campus would have a new pick-up/drop-off with a new egress driveway connecting to Stony Creek Road. The pick-up/drop-off would be expanded compared to existing conditions by separating parent and bus drop off and providing a new driveway between the eastern parking lot and western parking lot and the new egress to Stoney Creek. The vehicle circulation onsite would provide for more vehicles to be accommodated on campus. As discussed above, the campus supervisor would be tasked with coordinating efficient internal circulation during pick-up/drop-off, including metering cars leaving the campus.

Ione Junior High School Site Improvements

To accommodate the increase in students and change in grades from moving Ione ES to Ione Junior HS campus, site improvements would be required. The District would add a new two-classroom building, totaling approximately 2,656 square feet (building would be all-electric) and playground for preschool, TK, and Extending Learning, convert science labs to kindergarten classrooms, and convert restrooms to kindergarten restrooms. Site improvements would also include up to new 3,000 square feet of lawn area. For these improvements, 29 trees would be removed. The District would expand the kitchen, and construct a new play structure and hand court areas.

The District would also improve internal circulation by separating parent and bus pick-up/drop-off and constructing a vehicle loop on the southeast side of the campus for parking traffic. As discussed above, the campus supervisor would be tasked with coordinating efficient internal circulation during pick-up/drop-off, including implementing a valet program (where administrators help load and unload students from vehicles and buses) and metering cars leaving the campus.

Sutter Creek Elementary School Site Improvements

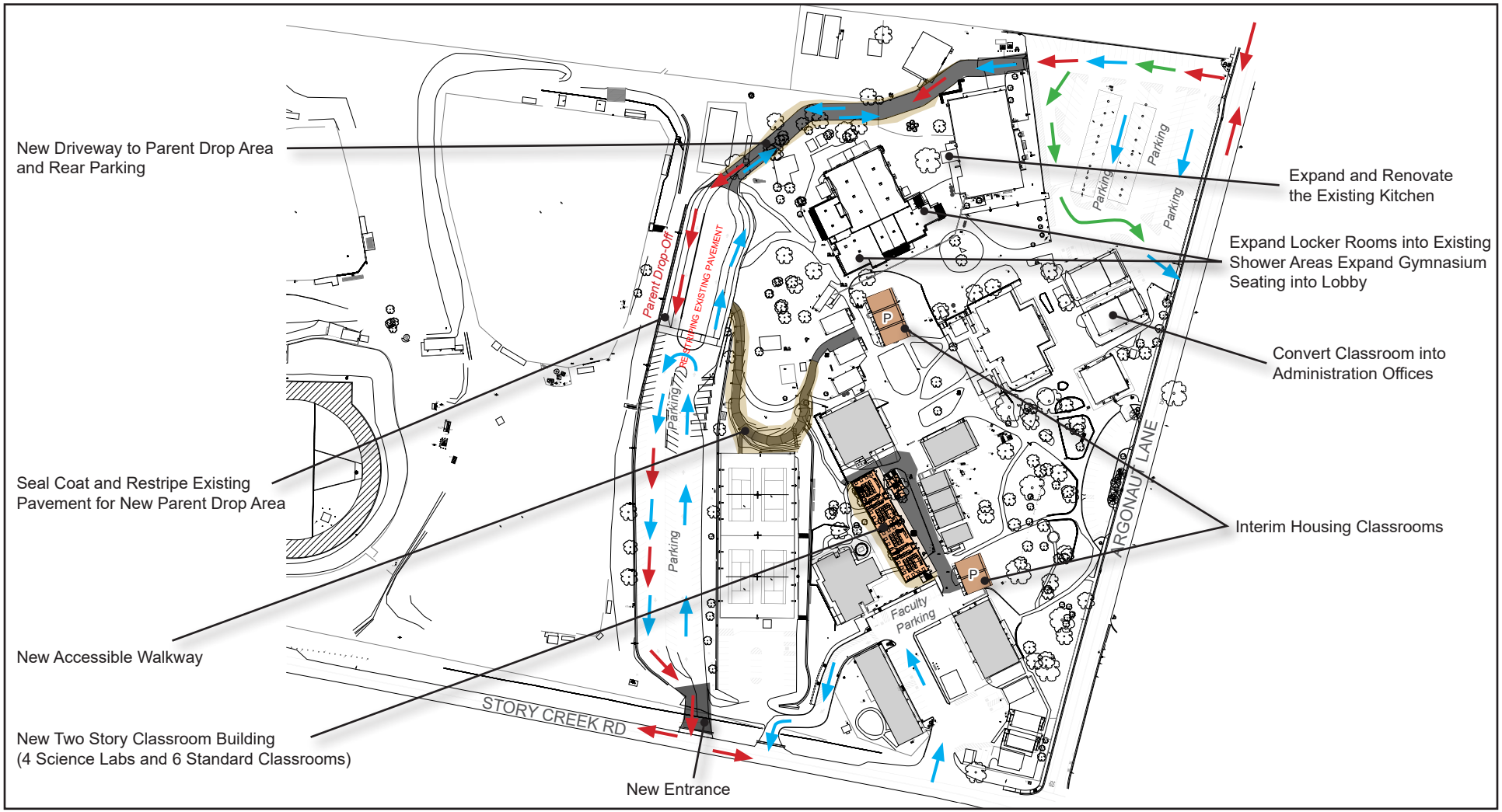
To accommodate the increase in students from the additional grades, site improvements would be required. The District would construct a new 2-story classroom building with 12 classrooms, totaling approximately 16,400 square feet and a building footprint of 8,200 square feet, and a 3,000 square foot covered lunch shelter. The proposed building would be all-electric. Additionally, 2,400 square feet of outdoor covered walkways would be added. These would be constructed on asphalt and no trees are planned to be removed. The campus would continue to be accessed from Sutter Ione Road or Spanish Street, adjacent to Amador HS. There are parking lots connected to each of these streets. As discussed above, the campus supervisor would be tasked with coordinating efficient internal circulation during pick-up/drop-off, including implementing a valet program (where administrators help load and unload students from vehicles and buses) and metering cars leaving the campus.

3.3.2 Project Construction

For the purposes of the analysis in this EIR, it is assumed that construction for the maximum development allowed pursuant to the proposed specific plan would occur in one phase at each campus. Construction at two campuses would occur around the same time allowing staff and students to move to the new schools in August

for the 2025-26 school year. Construction at Argonaut HS will begin in May 2024 and complete and be ready for occupancy in June 2025. Staff would move over in June and students in August 2025. Construction at the existing Ione Junior HS to convert to the elementary school would be conducted in two phases beginning in May 2024 and completed June 2025. Sutter Creek ES construction would be constructed over one phase, anticipated to begin in Spring of 2027 and would be completed by Spring of 2028 contingent on available funding. Construction would include the following activities: grading and excavation, tree removals at Argonaut HS and Ione Junior HS, demolition and removal of hardscapes, building construction, architectural coatings, walkway construction, landscaping, signage, and street connection improvements (at Argonaut HS only).

Figure 3-5 - Argonaut High School Site Improvements



Source: California Design West Architects 2023.

3. Project Description

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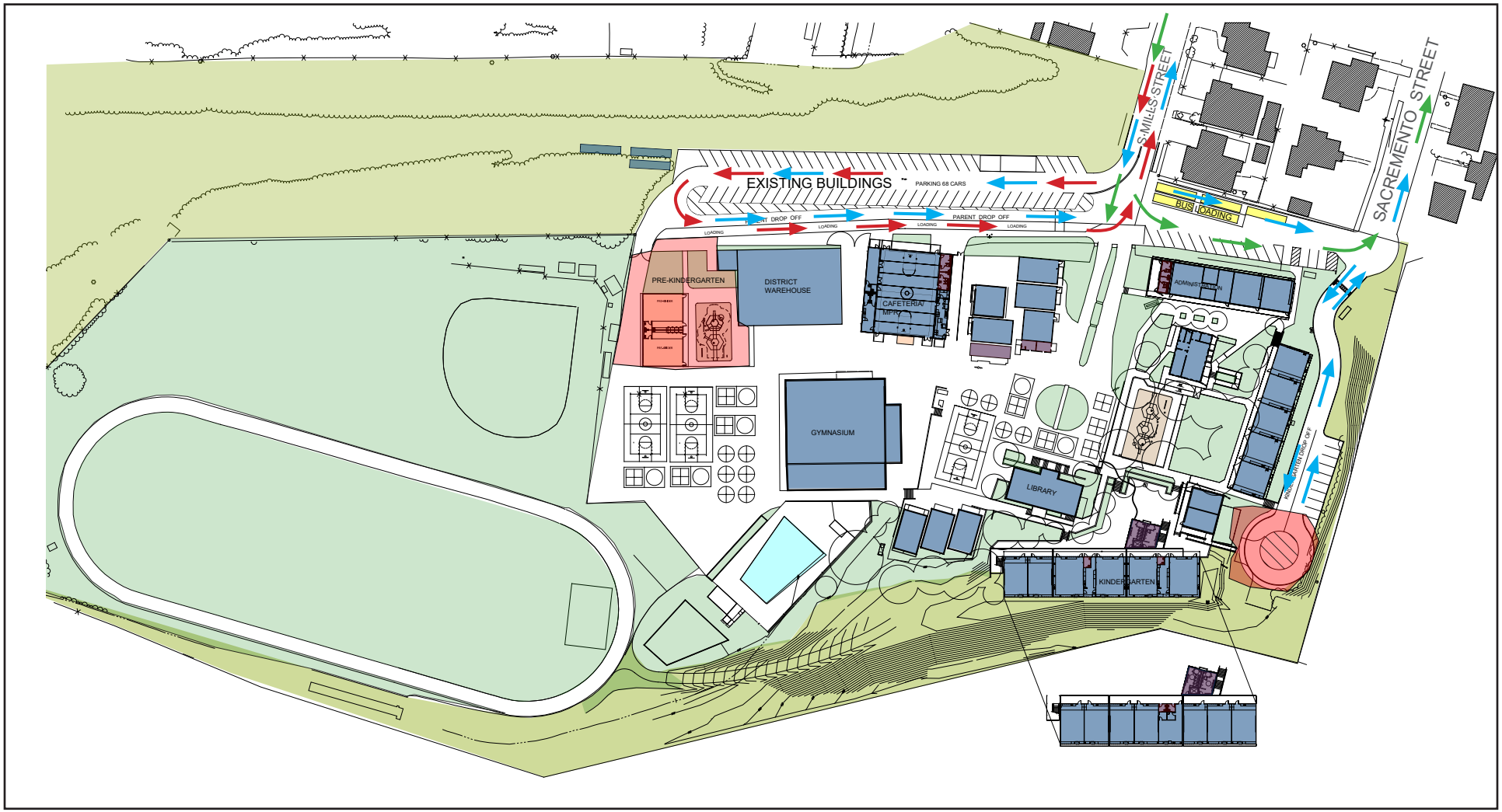
Figure 3-6 - Ione Elementary School at Former Ione Junior High School Site Improvements



Source: California Design West Architects 2023.

3. Project Description

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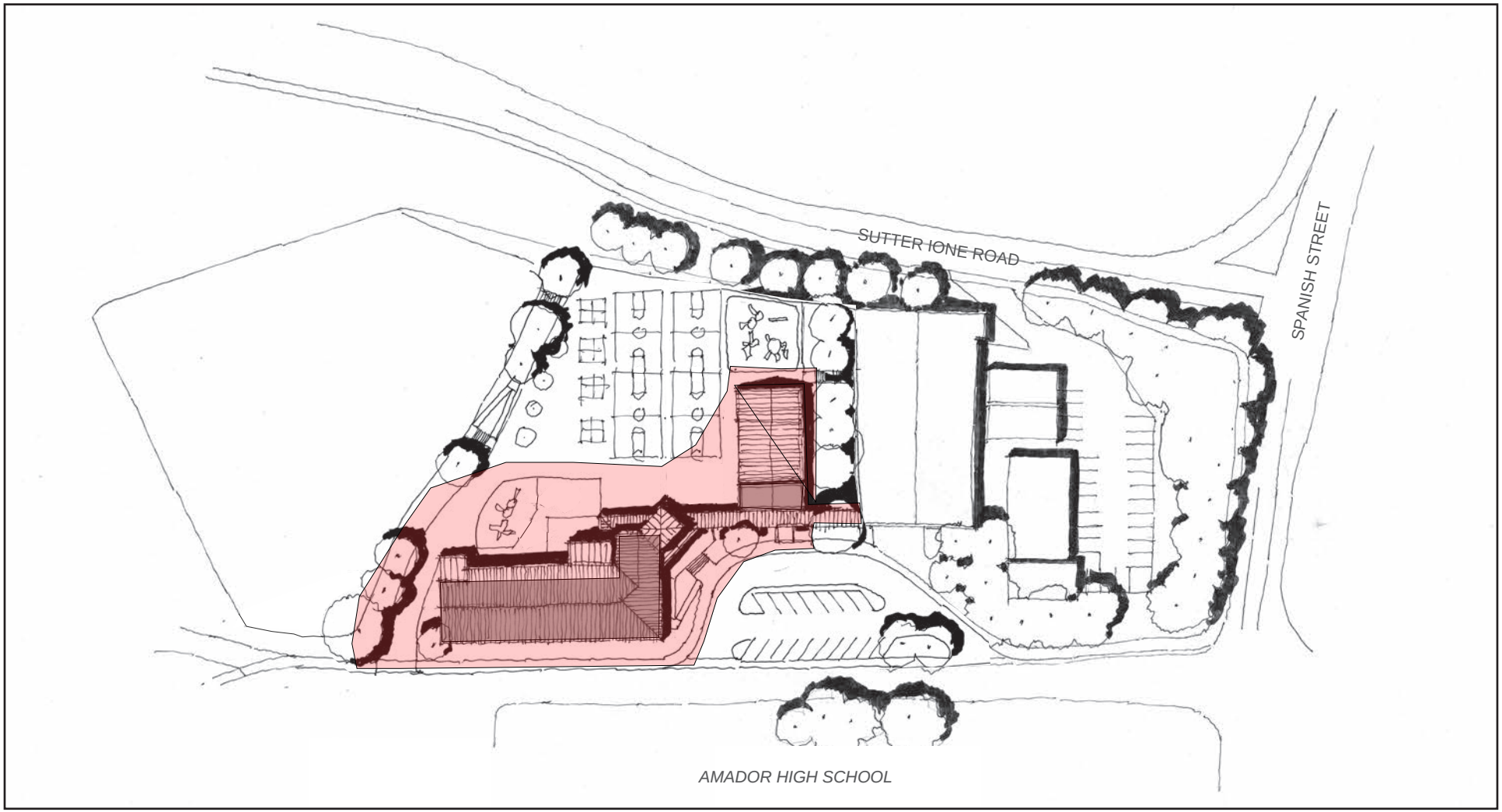
Figure 3-7 - Sutter Creek Elementary School Site Improvements



Source: California Design West Architects 2022.

3. Project Description

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3.3.3 Discretionary Actions

This DEIR will serve as the primary environmental document for all future actions associated with Amador County Unified School District's School Closure/Consolidation Program, including any discretionary approvals requested or required to implement the proposed project including the mitigation monitoring and reporting program. The District is the lead agency under CEQA and has the principal approval authority over the proposed project. In order to implement the proposed project, the following approvals outlined in Table 3-2, *Permits and Approvals*, are anticipated to be required.

Table 3-2 Permits and Approvals

Lead Agency	Action
Amador County Unified School District	Certify EIR Approve Project Adopt Mitigation Monitoring and Reporting Program
Responsible Agencies	**Action**
City of Jackson	Encroachment Permit: New access at Stony Creek Road for Argonaut High School
Jackson Fire Department; Ione Fire Department; and Sutter Creek Fire Department	Local Fire Code Compliance
Division of State Architects and California Department of Education	Review and approval

3.4 INTENDED USES OF THE EIR

This Draft EIR is a project DEIR that examines the environmental impacts of the proposed project. This DEIR also addresses various actions by the District and others to adopt and implement the proposed project. The DEIR is intended to disclose to the public, agencies, and decision makers the proposed project's details, analyses of the proposed project's potential environment impacts, and identification of feasible mitigation or alternatives that would lessen or reduce significant environmental impacts. It is the intent of this DEIR to evaluate the environmental impacts of the proposed project, thereby enabling the District, other responsible agencies, and interested parties to make informed decisions with respect to the requested entitlements. The anticipated approvals required for this project are listed in Table 3-1 above.

3.5 REFERENCES

Amador County Unified School District (ACUSD). 2022, February. Facilities Utilization Master Plan.

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Sutter Creek, City of. 2019a, July 15. City of Sutter Creek General Plan Land Use Diagram. https://cityofsuttercreek.org/2019-GP/General%20Plan%20Land%20Use%20Map.pdf

_____. 2019b, July 15. City of Sutter Creek General Plan Zoning Map https://cityofsuttercreek.org/forms-documents/SC_GP_Fig3_ZoningMap.pdf

4. Environmental Setting

4.1 INTRODUCTION

This section provides a "description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, ... from both a local and a regional perspective" (Guidelines § 15125[a]), pursuant to provisions of the California Environmental Quality Act (CEQA) and the CEQA Guidelines The environmental setting provides the baseline physical conditions from which the lead agency will determine the significance of environmental impacts resulting from the proposed project.

The proposed project is in Amador County Unified School District and would affect eight of the ACUSD's school campuses, listed below. Campuses not on the list would not be affected by the proposed project.

- Amador High School (330 Spanish Street, Sutter Creek, California 95685)
- Argonaut High School (501 Argonaut Lane, Jackson, California 95642)
- Ione Junior High School (450 S. Mill Street, Ione, California 95640)
- Jackson Junior High School (747 Sutter Street, Jackson, California 95642)
- Ione Elementary School (415 S. Ione Street, Ione, California 95640)
- Jackson Elementary School (220 Church Street, Jackson, California 95642)
- Sutter Creek Elementary School (340 Spanish Street, Sutter Creek, California 95685, and 110 Broad Street, Sutter Creek, California 95685)

4.2 REGIONAL ENVIRONMENTAL SETTING

4.2.1 Regional Location

Amador County Unified School District, including the project sites, is located in the western area of Amador County, near the base of the foothills bordering Eldorado National Forest. The county is located approximately 45 miles southeast of Sacramento in the Sierra Nevada Mountain Range. The county is surrounded by El Dorado County to the north, Alpine County to the east, Calaveras County to the south, San Joaquin County to the southwest, and Sacramento County to the west. The northeast portion of the county is within The Eldorado National Forest.

Regional access to the project sites is provided by State Route (SR) 88, SR 49, and SR 104.

4.2.2 Regional Planning Considerations

The campuses are within the Amador Air District (AAD), which has not adopted CEQA thresholds for air quality or greenhouse gas emissions. Therefore, impacts will be based on the current methodology of the Sacramento County Air Quality Management District (SMAQMD) in lieu of Amador County-specific guidance.

4.2.2.1 AIR QUALITY

The air pollutants emitted into the ambient air by stationary and mobile sources are regulated by federal and state law. These regulated air pollutants are known as criteria air pollutants and are carbon monoxide, volatile organic compounds (VOC), nitrogen oxides (NOx), sulfur dioxide, coarse inhalable particulate matter (PM10), fine inhalable particulate matter (PM2.5), and lead. VOC and NOx are criteria pollutant precursors and go on to form secondary criteria pollutants, such as ozone (O3), through chemical and photochemical reactions in the atmosphere. Air basins are classified as attainment/nonattainment areas for particular pollutants depending on whether they meet ambient air quality standards (AAQS) for that pollutant. The Amador Air District (AAD) is the agency responsible for ensuring that the National and California AAQS are attained and maintained in the Mountain Counties Air Basin (MCAB) by regulating air pollutant emissions from stationary and industrial sources. MCAB is designated as attainment or unclassified for the criteria air pollutants, except for ozone. MCAB is designated as nonattainment with respect to the state and federal 8-hour ozone standards (CARB 2022a, 2022b). The proposed project's consistency with the applicable AAQS is discussed in Section 5.2, *Air Quality*.

4.2.2.2 GREENHOUSE GAS EMISSIONS

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in EO S-03-05 and EO B-30-15, EO B-55-18, Assembly Bill 32 (AB 32), Senate Bill 32 (SB 32), and SB 375.

Executive Order S-3-05, signed June 1, 2005, set the following GHG reduction targets for California:

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

EO B-30-15, signed April 29, 2015, set a goal of reducing GHG emissions within the state to 40 percent of 1990 levels by year 2030. EO B-30-15 also directed CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires state agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for 2050 in EO S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaption strategy, "Safeguarding California", in order to ensure climate change is accounted for in state planning and investment decisions.

Executive Order B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." Executive Order B-55-18 directs CARB to work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition

to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

AB 32 was passed by the California state legislature on August 31, 2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in EO S-03-05. CARB prepared the 2008 Scoping Plan to outline a plan to achieve the GHG emissions reduction targets of AB 32. The proposed project's consistency with CARB's Scoping Plan is analyzed in Section 5.7, *Greenhouse Gas Emissions*.

In 2008, SB 375 was adopted to connect GHG emissions reductions targets for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips. SB 375 required CARB to establish GHG emissions reduction targets for each of the 17 regions in California managed by a Metropolitan Planning Organization (MPO). In addition, SB 375 requires CARB to update the targets for the MPOs every eight years. Amador County is not included in an MPO for which an SB 375-compliant RTP is required.

Refer to Section 5.7, *Greenhouse Gas Emissions.*

4.3 LOCAL PLANNING CONSIDERATIONS SETTING

As discussed in Section 4.1, *Introduction*, the proposed project is in Amador County Unified School District and would affect eight of the ACUSD's school campuses.

However, out of the eight schools that would be affected, three of the schools would have specific site improvements and their impacts will be analyzed in more detail in the forthcoming sections. The specific improvements that would occur at each school are listed below.

Argonaut High School Site Improvements

The District is proposing to add a two-story, ten classroom building with four science labs and six standard classrooms, relocate five portable classrooms from Jackson Junior HS to this campus, convert two preschool classrooms to regular classrooms, convert a classroom for counseling offices, a kitchen renovation and expansion, and renovate and expand gymnasium locker rooms. The campus would have a new parent drop-off, new access road connecting to Stony Creek Road, and accessibility compliance improvements throughout campus.

Ione Junior High School Site Improvements

The District would add two new classroom buildings and playground for preschool, TK, and Extending Learning, convert science labs to kindergarten classrooms, and convert restrooms to kindergarten restrooms. The District would also expand the parent drop-off/pick-up areas, expand the kindergarten drop-off area, expand the kitchen, and construct a new play structure and hand court areas.

Sutter Creek Elementary School Site Improvements

The District would construct a new classroom building with 12 classrooms and a lunch shelter.

4.3.1 Location and Land Use

As discussed in Section 4.1, *Introduction*, the eight school campuses that would be affected by the project are: Amador HS (330 Spanish Street, Sutter Creek, California 95685), Argonaut HS (501 Argonaut Lane, Jackson, California 95642), Ione Junior HS (450 S. Mill Street, Ione, California 95640), Jackson Junior HS (747 Sutter Street, Jackson, California 95642), Ione ES (415 S. Ione Street, Ione, California 95640), Jackson ES(220 Church Street, Jackson, California 95642), and Sutter Creek ES which has two locations (340 Spanish Street, Sutter Creek, California 95685, and 110 Broad Street, Sutter Creek, California 95685).

Amador HS and both locations of Sutter Creek ES are currently zoned as Public Service (P-S) with a land use designation of Public Service (PS) (Sutter Creek 2019a, 2019b). Argonaut HS, Jackson Junior HS, and Jackson ES are all zoned and have a land use designation of Public (Jackson 2014). Currently, the City of Jackson is in the process of adopting a General Plan Update. Argonaut HS, Jackson Junior HS, and Jackson ES are all zoned and have a land use designation of Public (P) (Jackson 2023.) Ione Junior HS and Ione ES are zoned as Public Facilities (PF) with a land use designation of Public Service (PS) (Ione 2018, 2009).

As described in Chapter 3, *Project Description*, the School Closure/Consolidation Program project (proposed project) would directly affect Argonaut HS, Ione Junior HS and Sutter Creek Elementary. The other schools will not have associated site improvements and their impacts will be discussed in more broad terms.

4.3.2 Biological Resources

A biological resources technical report was prepared for the project which stated that there were no sensitive vegetation communities or special status wildlife species observed during the field survey. Data was gathered and sensitive animals and plant species were identified that had the potential to occur on site. No wildlife movement corridors or wildlife movement areas were identified at any of the sites. There are no jurisdictional waterways within any of the BSAs which include wetlands, vernal pools, and riparian habitats.

The three schools that will have site improvements have already been subjected to ground-disturbing activities associated with the existing development. Refer to Section 5.3, *Biological Resources*, for additional information concerning biological resources and an analysis of impacts on such resources.

4.3.3 Climate and Air Quality

As described in Section 4.2, *Regional Environmental Setting*, Amador County is in the Amador Air District (AAD), which does not have adopted CEQA thresholds for air quality or greenhouse gas emissions. Therefore, impacts will be based on the current methodology of the Sacramento County Air Quality Management District (SMAQMD) in lieu of Amador County-specific guidance. The Amador Air Dsitct (AAD) is the agency responsible for ensuring that the National and California AAQS are attained and maintained in the Mountain Counties Air Basin (MCAB) by regulating air pollutant emissions from stationary and industrial sources. MCAB

is designated as attainment or unclassified for the criteria air pollutants, except for ozone. MCAB is designated as nonattainment with respect to the state and federal 8-hour ozone standards (CARB 2022a, 2022b). Additional information regarding air quality and climate change regulations affecting the Amador community is provided in Section 4.2.2, *Regional Planning Considerations*. Existing air quality conditions in the Amador community, greenhouse gas emissions and energy consumption are discussed in more detail in Sections 5.2, *Air Quality*, 5.5, *Energy*, and 5.7, *Greenhouse Gas Emissions*.

4.3.4 Cultural, Paleontological, and Tribal Cultural Resources

The three project sites are developed with landscaping, hardscaping, buildings, and are in urbanized areas of the city that have already been subjected to ground-disturbing activities associated with the existing development. The Archaeological Resources and Architectural History Inventory and Evaluation Report identified two built environment resources that exceed 50 years of age: Ione Junior HS, the former Ione HS campus; and Sutter Creek ES. These resources were evaluated using the National Register of Historic Places (NRHP) and CRHR eligibility criteria. The Archaeological Resources and Architectural History Inventory and Evaluation Report determined that neither Ione Junior HS nor Sutter Creek ES are eligible for the NRHP or CRHR. Over the three project sites, there was varying degrees of potential for any preserved subsurface archaeological material. The potential for human remains over the three project sites is low.

A search of the Sacred Lands File by the NAHC indicated the presence of Native American cultural resources within the archeology project area. No historic-era or pre-contact archaeological materials were identified during any of the field surveys. At the three project areas, there was varying degrees of potential for buried pre-contact resources.

Refer to Section 5.4, *Cultural Resources*, and Section 5.16, *Tribal Cultural Resources*, for additional information concerning cultural, paleontological, and tribal cultural resources and an analysis of project-related impacts.

4.3.5 Transportation

Regional access to the eight schools is provided by major roadways, including SR-88, SR-49, SR-124, and SR-104. Meanwhile, local access to the project sites is provided by a variety of local roadways, including minor arterials, major collectors, and local roads, provide access to the campuses. Walking paths are spread throughout the project sites and there are publicly accessible sidewalks near the campuses.

The Amador Transit System provides buses along multiple routes that connect Sutter Creek, Jackson and Ione together. Specifically, there are three bus routes that connect the three cities, including are Routes 5, 6, and 7 (Amador Transit). Bus routes serve Argonaut HS, Ione Junior HS, and Sutter Creek ES. Near Argonaut HS, there are two bus stations that serve Routes 5 and 6. Ione Junior HS is near two main bus stations that serve Route 7. Sutter Creek ES is a bus station that serves routes 3, 5 and 6.

Refer to Section 5.15, *Transportation*, for additional information concerning existing transportation facilities and traffic conditions and an analysis of project-related impacts.

4.3.6 Geology and Landform

In Amador County, there are no Alquist-Priolo Earthquake Fault Zones and areas subject to liquefaction, ground failure, or surface rupture are not identified on State hazard maps (Amador 2016a). The closest fault to the project sites is the Bear Mountain Fault Zone. The nearest Alquist-Priolo Earthquake Fault Zone is the Clayton Fault, approximately 70 miles away (CDC 2015). Seismic-related liquefaction is low at the project sites and the corresponding potential for lateral spreading during liquefaction is also considered low.

Refer to Section 5.6, *Geology and Soils*, for additional information concerning geological and soil conditions and an analysis of the proposed project's impacts on geology and soils.

4.3.7 Hydrology

The three schools are in a highly urbanized, built-out portion of the County of Amador where soils have already been disturbed by existing development. The existing sites vary in imperviousness, with driveways, parking lots, buildings, landscaping, etc. No streams or rivers traverse or are located in the vicinity of the three schools, which are already developed and largely flat. The projects sites are in the Lower Sutter Creek watershed and the Middle Jackson Creek watershed (USEPA 2023a, 2023b). The main waterbodies near the project sites are Jackson Creek, Amador Lake, and Sutter Creek. Within the three cities, only the City of Ione has a groundwater basin. Out of the three project sites, the flooding potential is highest at Ione Junior HS.

Refer to Section 5.9, *Hydrology and Water Quality*, for additional information concerning the noise environment and an analysis of the proposed project's noise impacts.

4.3.8 Noise

The three sites that will have improvements and their noise levels will be discussed in more detail are Argonaut HS, Ione Junior HS, and Sutter Creek ES.

The project sites are generally in developed areas with residential, commercial, industrial, and academic uses and are subject to noise from transportation and stationary sources. In addition to roadway noise and stationary noise sources (property maintenance, light mechanical equipment, people talking, etc.), Argonaut HS and Sutter Creek ES are also subject to recurring events of athletic field noise from the existing uses on the project sites.

Specific noise-sensitive receptors for the three schools with physical site improvements are discussed below. Refer to Section 5.11, *Noise*, for additional information concerning the noise environment and an analysis of project-related noise impacts.

4.3.8.1 ARGONAUT HIGH SCHOOL

The nearest off-site noise sensitive receptors are residences located east, south, and west of campus and Sutter Creek ES located north. The most common and significant source of noise in Amador County as well as in the three cities where the campuses are located is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., residential, commercial, and industrial) that generate stationary-source noise.

4.3.8.2 IONE JUNIOR HIGH SCHOOL

The nearest off-site noise sensitive receptors are residences located north of campus. The most common and significant source of noise in Amador County as well as in the three cities where the campuses are located is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., residential, commercial, and industrial) that generate stationary-source noise.

Ione Junior HS has Low Density Residential (RL) directly north of the campus and Rural Residential to the southwest and is within a Special Planning Area (SPA). There is a small portion of General Commercial (GC) east of the campus (Ione 2009a). This school is mainly subject to noise from SR 124, which is 0.3 miles to the east of the site.

4.3.8.3 SUTTER CREEK ELEMENTARY SCHOOL

The nearest off-site noise sensitive receptors are residences located north and east of campus, and Amador HS located south. The most common and significant source of noise in Amador County as well as in the three cities where the campuses are located is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., residential, commercial, and industrial) that generate stationary-source noise.

4.3.9 Scenic Features

The ACUSD campuses that are part of the proposed project, including the three campuses with physical site improvements, are in developed areas of cities of Jackson, Sutter Creek, and Ione in the western part of the county. The county is bordered by U.S Route (US) 50 to the north, SR 89 to the east, SR 4 to the south, and SR 99 to the west. The cities are surrounded by open space and public land, including parts of the El Dorado National Forest to the east. The three campuses where site improvements would occur are within developed school campuses. The county itself is host to a rich diversity of natural and biological resources, including rolling hills covered with oak woodland, grassland, and chaparral. (Amador 2016a). Views surrounding these three campuses are primarily characterized by pastoral and residential views of open fields, trees, and one to two-story residential buildings. Details related to impacts on the project site's aesthetic features, are provided in Section 5.1, *Aesthetics*.

4.3.10 Public Services and Utilities

Local fire protection services for the project sites are served by Jackson Fire Department, Ione Fire Department, and Sutter Creek Fire Protection District. Police protection services are provided by the Jackson Police Department, Ione Police Department, and Sutter Creek Police Department. The ACUSD consists of six elementary schools, two junior high schools, two high schools, and one alternative high school, and serves approximately 4,000 preschool through 12th grade students, as well as adult students (ACUSD 2023a; ACUSD 2023b). The county operates five branches, and each school has their own library.

Concerning utilities, each city has sperate wastewater treatment and storm drain systems, but the same water supply and solid waste system. PG&E provides electricity and natural gas services to Amador County. Communication services are offered regionally by franchised telecommunications providers, such as AT&T and Spectrum.

Refer to Section 5.13, *Public Services*, for additional information concerning public services, and Section 5.17, *Utilities and Service Systems*, for additional information concerning utilities.

4.3.11 General Plan and Zoning

Amador HS and both locations of Sutter Creek ES are currently zoned as Public Service (P-S) with a land use designation of Public Service (PS) (Sutter Creek 2019a, 2019b). Argonaut HS, Jackson Junior HS, and Jackson ES are all zoned and have a land use designation of Public (Jackson 2014). As mentioned previously, the City of Jackson is in the process of adopting a General Plan Update. Argonaut HS, Jackson Junior HS, and Jackson ES are all zoned and have a land use designation of Public (P) (Jackson 2023.) Ione Junior HS and Ione ES are zoned as Public Facilities (PF) with a land use designation of Public Service (PS) (Ione 2018, 2009).

4.4 ASSUMPTIONS REGARDING CUMULATIVE IMPACTS

Section 15130 of the CEQA Guidelines states that cumulative impacts shall be discussed where they are significant. It further states that this discussion shall reflect the level and severity of the impact and the likelihood of occurrence, but not in as great a level of detail as that necessary for the project alone. Section 15355 of the Guidelines defines cumulative impacts as "...two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Cumulative impacts represent the change caused by the incremental impact of a project when added to other proposed or committed projects in the vicinity.

The CEQA Guidelines Section 15130(b)(1) states that the information utilized in an analysis of cumulative impacts should come from one of two sources:

A. A list of past, present and probable future projects producing related cumulative impacts, including, if necessary, those projects outside the control of the agency.

B. A summary of projections contained in an adopted General Plan or related planning document designed to evaluate regional or area-wide conditions.

The cumulative impacts analyses in this DEIR use Method B. Amador County completed a Countywide Plan in 2016, the City of Jackson's General Plan includes elements completed between 1981 and 2014, the City of Ione General Plan was completed in 2009, and the City of Sutter Creek's General Plan was completed in 2019. The cumulative impact analysis in this DEIR utilizes the projections in these General Plans. Table 4-1, *Demographic Projections for Cumulative Analyses,* presents population and housing projections for existing conditions, the horizon years, and net changes.

Table 4-1 Demographic Projections for Cumulative Analyses

	Population (2023)	Population (Buildout Year)[1]	Net change	Housing (2023)	Housing (Buildout Year)[1]	Net change
Amador County (2030)	22,282	25,241	2,959	12,385	13,364	979
City of Jackson (2040)	4,938	6,506	1,568	2,418	3,087	669
City of Ione (2030)	8,772	18,182	9,410	2,203	7,475	5,272
City of Sutter Creek (2040)	2,590	19,900	17,310	1,432	9,400	7,968

Source: DOF 2023, Amador County 2016b, Jackson 2023, Ione 2009b, Sutter Creek 2019c.
[1] Buildout year for Amador County General Plan and City of Ione General Plan is 2030, and buildout year for City of Jackson and City of Sutter Creek is 2040.

As shown in Table 4-1, the County and Cities of Jackson, Ione, and Sutter Creek would experience increases in population and housing between existing conditions and buildout per the respective General Plans.

The population increases for each jurisdiction are as follows:

- Amador County: 13 percent
- City of Jackson: 32 percent
- City of Ione: 107 percent
- City of Sutter Creek: 668 percent

The housing increases for each jurisdiction are as follows:

- Amador County: 8 percent
- City of Jackson: 28 percent
- City of Ione: 239 percent
- City of Sutter Creek: 556 percent

Since the proposed project would not increase student enrollment in the District and would not generate new housing units, Method B approach is highly conservative and appropriate for evaluating cumulative impacts related to the proposed project.

In addition, the cumulative analyses also consider the following cumulative projects near Argonaut HS, Ione Junior HS, and Sutter Creek ES:

- Wicklow Way Specific Plan would allow up to 700 residential units, 26 acres of community commercial and civic uses, 46 acres of open space, 6.9 acres of park of recreation, and 42 acres of public uses (Amador County 2023). This cumulative project would be adjacent to Argonaut HS.
- Sutter Street Extension Project would extend Sutter Street from its current terminus near Argonaut Drive to connect to Hoffman Street within the City of Jackson (Jackson 2022). This cumulative project would be approximately 0.5 miles east of the Argonaut HS.

4. Environmental Setting

- Campbell Vesting Tentative Parcel Map No. 2894 would split the existing 19.5-acre commercially designated parcel with a planned development overlay creating a 5.26-acre commercial parcel on which Campbell Construction is currently located, and a 14.24-acre parcel to be rezoned and re-designated as RE – Residential Estate, with no (pd) overlay where one single-family unit would be constructed (Sutter Creek 2020). This cumulative project is approximately one mile south of Sutter Creek ES.

The cumulative impacts of the proposed project have been addressed for each environmental category discussed in Chapter 5.0, *Environmental Analysis,* of this DEIR.

4.5 REFERENCES

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4. Environmental Setting

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5. Environmental Analysis

Chapter 5 examines the environmental setting of the proposed project, analyzes its effects and the significance of its impacts, and recommends mitigation measures to reduce or avoid impacts. This chapter has a separate section for each environmental issue area that was determined to need further study in the EIR. An initial study is not required to determine that an EIR would be prepared, and an initial study was not prepared for the proposed project. This scope was described in the notice of preparation (NOP), which was published June 2023 (see Appendix A) and through public and agency comments received during the NOP comment period from June 21, 2023, to July 20, 2023 (see Appendix B).

Due to the relocation of students and staff and the resulting changes in transportation patterns, the overall proposed project has the potential to impact air quality, greenhouse gas emissions (GHG), noise, transportation, and utilities and service systems over a large portion of the District jurisdiction. These are areawide shifts in logistics and transportation and involve all eight school campuses. Therefore, the analysis of air quality, GHG, noise, transportation (i.e., vehicle miles traveled), and utilities and service systems will address project changes across the attendance areas of all eight schools.

Physical site improvements are proposed at only three schools—Argonaut HS, Ione Junior HS, and Sutter Creek ES. Therefore, the assessment of impacts that are site specific and will only be addressed for these three schools. The other five campuses have no potential for such impacts and therefore do not warrant such assessment. The section with site-specific issues are listed below.

To address the different components of the proposed project, the Environmental Impacts section of each topical analysis will include these subheadings:

- **Argonaut High School Site Improvements.** This subheading will address potential impacts associated with the construction of the site improvements at Argonaut HS, including additional classrooms, various building renovations, and new parent drop-off/access road connecting to Stony Creek Road. This subheading will also address the increase in student capacity.

- **Ione Junior High School Site Improvements.** This section will address potential impacts associated with the construction of the site improvements at Ione Junior HS, including additional classrooms, playground improvements, building renovations, and expansion of the parent drop-off/pick-up area. This subheading will also address the increase in student capacity.

- **Sutter Creek Elementary School Site Improvements**. This subheading will address potential impacts associated with construction of the site improvements at Sutter Creek ES, including a new classroom building and lunch shelter, and increase in student capacity.

5. Environmental Analysis

A fourth subheading will address area-wide effects of the overall proposed project. Only five sections, below, will use this subheading.

- **School Closure/Consolidation Program.** This will address area-wide impacts due to the relocation of students and staff and the resulting changes in transportation patterns.
    - 5.2 Air Quality
    - 5.7 Greenhouse Gas Emissions
    - 5.11 Noise
    - 5.15 Transportation
    - 5.17 Utilities and Service Systems

The remaining sections will analyze the impacts of the physical site improvements and associated construction at the three schools mentioned above. These sections will include the first three subheadings but not the fourth, because the area-wide effects of the school closure/consolidation program would not affect them.

- 5.1 Aesthetics
- 5.3 Biological Resources
- 5.4 Cultural Resources
- 5.5 Energy
- 5.6 Geology and Soils
- 5.8 Hazards and Hazardous Materials
- 5.9 Hydrology and Water Quality
- 5.10 Land Use and Planning
- 5.12 Population and Housing
- 5.13 Public Services
- 5.14 Recreation
- 5.16 Tribal Cultural Resources
- 5.18 Wildfire

Sections 5.1 through 5.18 provide a detailed discussion of the environmental setting, impacts associated with the proposed project, and mitigation measures designed to reduce significant impacts where required and when feasible. The residual impacts following the implementation of any mitigation measure are also discussed.

It was also determined that certain issues under an environmental topic would not be significantly affected by implementation of the proposed project; these issues are not discussed further in this EIR: agricultural and forestry resources and mineral resources.

Organization of Environmental Analysis

To assist the reader with comparing information between environmental issues, each section is organized under seven major headings:

- Environmental Setting
  - Regulatory Background
  - Existing Condition
- Thresholds of Significance
- Environmental Impacts
- Mitigation Measures
- Level of Significance After Mitigation
- Cumulative Impacts
- References

In addition, a table at the end of Chapter 1, *Executive Summary,* summarizes all impacts and mitigation measures by environmental issue.

Terminology Used in This Draft EIR

The level of significance is identified for each impact in this DEIR. Although the criteria for determining significance are different for each topic area, the environmental analysis applies a uniform classification of the impacts based on definitions consistent with CEQA and the CEQA Guidelines:

- **No impact.** The project would not change the environment.
- **Less than significant.** The project would not cause any substantial, adverse change in the environment.
- **Less than significant with mitigation incorporated.** The EIR includes mitigation measures that avoid substantial adverse impacts on the environment.
- **Significant and unavoidable.** The project would cause a substantial adverse effect on the environment, and no feasible mitigation measures are available to reduce the impact to a less than significant level.

5. Environmental Analysis

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5.1 AESTHETICS

Consistent with Chapter 5.00, this section of the Draft Environmental Impact Report (DEIR) evaluates the proposed project's potential impacts on the aesthetic resources due to the site improvements at Argonaut HS, Ione Junior HS, and Sutter Creek ES and their surroundings. This section includes a qualitative discussion of the aesthetic characteristics of the environment that could potentially be altered by the proposed project's implementation and evaluates the proposed project's potential impacts on scenic vistas, visual character, scenic highways, and light and glare.

5.1.1 Environmental Setting

5.1.1.1 REGULATORY BACKGROUND

State

California Scenic Highway Program

The California Scenic Highway Program, maintained by the California Department of Transportation (Caltrans), was created by the State legislature in 1963 to protect scenic state highway corridors from changes that would diminish the aesthetic value of lands adjacent to these highways. The State laws governing the Scenic Highways Program are found in the Streets and Highways Code, Sections 260 through 263 (Caltrans 2023).

California Building Standards Code

The California Building Code (CBC) is a collection of building design standards for all developments in California. It is found in Title 24 of the California Code of Regulations (CCR). It includes the California Energy Code (Part 6) and the California Green Building Standards Code (CALGreen) (Part 11).

- California Energy Code includes energy-efficiency standards that are designed to reduce wasteful, uneconomic, inefficient, or unnecessary energy consumption and enhance environmental quality. Section 130 includes requirements for the design and installation of all lighting systems.

- CALGreen includes standards to reduce negative environmental impacts and increase sustainable construction practices. Specifically, Section 5.106.8, *Light Pollution Reduction*, establishes backlight, uplight, and glare ratings to minimize the effects of light pollution for nonresidential development.

Local

City of Ione General Plan

The City of Ione General Plan is the primary planning document for the city. It sets goals, objectives, and policies concerning the community and directs growth and development. Goals, objectives, and policies related to aesthetics are as follows (Ione 2009).

- **Policy CO-3.1:** Conserve existing native and non-invasive trees for their historic, economic, aesthetic, educational, and environmental value.

- **Policy CO-3.2:** The City shall require preservation of all trees of 36" dbh or greater on development sites, unless health, safety, or access requirements do not allow for preservation of such trees. All development is required to fully mitigate the removal of any trees by replanting.
- **Policy CO-3.4**: Improve overall landscaping quality and sustainability in all areas visible to the public through the creation of development guidelines and/or standards that establish minimum planting provisions for landscaped areas within new developments.
- **Policy CO-5.1:** Ensure that the environmental effects of mining and reclamation on aquifers, streams, scenic views, and surrounding residential uses are prevented or minimized.
- **Goal CO-9:** Protect open space areas, including preservation of scenic views.

City of Jackson General Plan

The City of Jackson General Plan is the primary planning document for the city. It sets goals, objectives, and policies concerning the community and directs growth and development. The General Plan also identifies a visual overlay on the northeast side of the City (east of State Route 88), and on the south side of the City along State Route 49. Goals, objectives, and policies related to aesthetics are outlined here (Jackson 2008).

- **Goal 4:** To preserve and enhance the character of scenic and historic routes through the community.
- **Policy 4.A.1**: Views along designated scenic routes shall not be degraded.
- **Policy 4.A.2:** New development along scenic or historic routes shall be required to incorporate visual aesthetics into the design of transportation facilities.

Currently, the City of Jackson is in the process of adopting its General Plan Update that will continue to guide future decisions within the city. Goals, objectives, policies, and actions related to aesthetics are outlined here (Jackson 2023).

- **Policy LU 2.3**: Require that development is located and designed to ensure compatibility among land uses, addressing such elements as building orientation and setbacks; buffering; visibility and privacy; automobile and truck access; impacts of noise, lighting, and glare; landscape quality; and aesthetics.
- **Policy LU 2.4**: Promote the scenic development of the Jackson Creek corridor.
- **Goal CIRC-4**: To preserve and enhance the character of scenic and historic routes through the community.
- **Objective 4.A**: To preserve, enhance, and protect scenic and historic routes from degradation by new development.
- **Policy CIRC 4.1**: Views along designated scenic routes shall not be degraded.

- **Policy CIRC 4.2**: New development along scenic or historic routes shall be required to incorporate visual aesthetics into the design of transportation facilities.
- **Policy COS 1.1**: Support a balanced and integrated open space system that reflects a variety of considerations, including resource conservation, recreation, aesthetics, and community identity.
- **Policy COS 1.5**: Protect Jackson's scenic resources, including views of the hillsides, prominent ridgelines, riparian areas, and other significant natural features, to the extent practical.
- **Policy COS 3.5**: Avoid removal of large, mature trees that provide wildlife habitat, visual screening, or contribute to the visual quality of the environment through appropriate project design and building siting, if feasible. If full avoidance is not possible, prioritize planting of replacement trees on-site over off-site locations. Replacement trees for high-quality mature trees should generally be of like kind, and provide for comparable habitat functionality, where appropriate site conditions exist.
- **Policy SA 2.4**: Encourage and accommodate multipurpose flood control projects that incorporate recreation, resource conservation, preservation of natural riparian habitat, and scenic values of drainages, creeks, and detention ponds.

City of Sutter Creek General Plan

The City of Sutter Creek General Plan is the primary planning document for the city. It sets goals, objectives, and policies concerning the community and directs growth and development. Goals, policies, and implementation measures related to aesthetics are outlined here (Sutter Creek 2019).

- **Goal LU-1:** Allow the City to grow and prosper while protecting existing neighborhoods and the existing quality of life that is the essence of Sutter Creek. The existing quality of life includes the City's rural small town atmosphere, its historic qualities, and its current level of public services and facilities. The scenic and natural beauty of the existing skyline, prominent hillsides, and riparian corridors in the City and surrounding planning area as well as other topographically sensitive features shall be protected by requiring the use of creative land development designs that transfer density and construction to less sensitive areas.
- **Policy COS-1.3.2:** New development shall preserve existing open space, as appropriate, for habitat, passive recreation, active recreation, and/or for visual access and/or aesthetics.

City of Ione Municipal Code

Ione Municipal Code provides regulations for the city that relate to aesthetics. Title 15, *Buildings and Construction,* enforces the California Building Code and the California Green Building Standards Code. These include design standards for new developments including lighting requirements. Title 19, *Zoning,* carries out the policies of the General Plan by classifying and regulating the uses of land and structures within the city. It provides standards and guidelines for the orderly growth and development of the city that will assist in protecting the characteristics and community identity of Ione.

City of Jackson Municipal Code

Jackson Municipal Code provides regulations for the city that relate to aesthetics. Title 14, *Buildings and Construction,* enforces the California Building Code and the California Green Building Standards Code. These include design standards for new developments, including lighting requirements. Title 17, *Development Code,* includes the Zoning Code and development code and ensures that the development and land uses are of appropriate character and quality, considerate of the community's natural resources, compatible with existing and future land uses, and consistent with the General Plan. Specifically, Section 17.43.030, *Citywide Lighting Regulations,* states that no High Intensity Discharge lights may be utilized in any exterior application within the City and no lights or lamps with a Correlated Color Temperature of higher than 2400 K or a Color Rendering Index of lower than 70 may be utilized on any exterior within the City.

City of Sutter Creek Municipal Code

Sutter Creek Municipal Code provides regulations for the city that relate to aesthetics. Title 15, *Buildings and Construction,* enforces the California Building Code and CALGreen. These include design standards for new developments, including lighting requirements. Title 18, *Zoning Ordinance,* assists in implementing the General Plan to serve the public health, safety, comfort, convenience, and general welfare; to provide for the economic and social advantages resulting from an orderly planned use of land resources; and to encourage, guide, and provide a definite plan for the future growth and development of the city.

5.1.1.2 EXISTING CONDITIONS

Visual Character

Amador County is in the Sierra Nevada foothills and has maintained a rural character. Amador County has a rich history of gold mining, timber harvesting, and grazing, which can be seen in the character of the cities. The ACUSD campuses that are part of the proposed project, including the three campuses with physical site improvements, are in developed areas of cities of Jackson, Sutter Creek, and Ione in the western part of the county. The three campuses with site improvements are served by a network of local and regional roadways. Amador County and its cities portray a historic gold country and old west character. The cities are surrounded by open space and public land, including parts of the El Dorado National Forest to the east. Wine has become a prominent industry, so much of the open space near the cities consist of vineyards and wineries (Amador County 2016).

The City of Ione exists on the boundary between the Central Valley of California and the foothills of the Sierra Nevada. Ione maintains a rural character with recreational open space, rangeland, and farmland (Ione 2009). Like Ione, the City of Jackson maintains a rural character with its city character rooted in their Gold Rush history (Jackson 2008). The City of Sutter Creek also maintains a rural character that is rich in open space and historic character (Sutter Creek 2019).

Visual Resources

The three project sites where site improvements would occur are within developed school campuses. Large trees and open fields surround Argonaut HS. Within the Argonaut HS campus, there is a rock outcrop located near the southwest part of campus surrounded by grasses and paved walkways. This outcrop is low to the ground and only visible from the interior of campus. Ione Junior HS is also surrounded by large trees and open fields near residential buildings and places of worship. Sutter Creek ES is surrounded by a residential building and Amador HS. Views surrounding these three campuses are primarily characterized by pastoral and residential views of open fields, trees, and one to two-story residential buildings.

Landform

Amador County is in the foothills of the Sierra Nevada. The areas surrounding Argonaut HS, Ione Junior HS, and Sutter Creek ES have elevations ranging from 500 to 2,000 feet, getting higher as you move east into the mountains with a maximum elevation of 8,800 feet in the Sierras. Rolling hills can be found within the cities with higher peaks visible in the background. The three campuses have gentle topography.

Scenic Vistas and Corridors

Two state highways, State Route (SR) 88 and SR 49, are the closest state routes to Argonaut HS, Ione Junior HS, and Sutter Creek ES. State Route 88 generally runs in a north-south direction; and SR 49 generally runs in an east-west direction (Caltrans 2023). The County and Caltrans have designated a portion of SR 88 as an officially designated scenic highway (Amador County 2016). The officially designated portion of SR 88 is located approximately 22 miles east of Argonaut HS (and further from Ione Junior HS and Sutter Creek ES). State Route 88 between SR 49 on its western end to where it becomes officially designated on its eastern end is designated as an eligible scenic route. The U.S. Forest Service has designated a portion of SR 88 as a National Forest Scenic Byway, beginning approximately 20 miles east of Argonaut HS (and farther from Ione Junior HS and Sutter Creek ES) (USDA 2019). It goes through the Sierra Nevada mountains and is surrounded by lush forests, rivers, and historical landmarks. The entire length of SR 49 in the county is identified as eligible for designation as scenic highway by the State of California but has not been officially designated (Amador County 2016; Caltrans 2023).

Argonaut HS is approximately 0.5 miles west of eligible portions of SR 49 and approximately 1.15 miles northwest of eligible portions of SR 88. Ione Junior HS is approximately 6.8 miles and 8.2 miles northwest of eligible portions of SR 49 and SR 88, respectively. Sutter Creek ES is approximately 0.3 miles east of an eligible portion of SR 49 and approximately 4 miles north of eligible portions.

The City of Ione General Plan specifies that commercial development should not be established along the SR 88 corridor, but rather within city limits. Additionally, though not a State-designated scenic highway, SR 104 serves as a visual corridor and gateway to Ione, due to the vast ranchland and open space northwest of Ione's downtown (Ione 2009).

The City of Jackson and City of Sutter Creek General Plans do not specify any designated scenic vistas or corridors (Jackson 2008; Sutter Creek 2019).

Light and Glare

Existing sources of light and glare exist on all three campuses and their surrounding areas. Existing light sources include security lighting on the campuses and surrounding properties, light emanating from windows, and vehicle headlines traveling along public rights-of-way and within parking lots. Existing daytime and nighttime glare sources include sunlight or vehicle headlights reflecting off reflective surfaces and light-colored building materials, such as parked cars and cars traveling on adjacent roadways and within parking lots and windows.

5.1.2 Thresholds of Significance

Appendix G of the California Environmental Quality Act (CEQA) Guidelines states that, "except as provided in Public Resources Code Section 21099," a project would normally have a significant effect on the environment if the project would:

AE-1 Have a substantial adverse effect on a scenic vista.

AE-2 Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.

AE-3 In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from 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?

AE-4 Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

5.1.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.1-1: The proposed project would not have a substantial adverse effect on a scenic vista. [Threshold AE-1]

A scenic vista generally refers to a view that possesses visual and aesthetic qualities of high value to the community. Aesthetic value is not limited to natural and rural viewsheds but can also be held in historic structures and districts, architectural design, and streetscapes. Scenic vistas typically include expansive or particularly prominent views of an essential visual resource. The Amador County, City of Ione, City of Jackson, and City of Sutter Creek General Plans do not identify specific scenic vistas in the cities; however, views of the Sierra Nevada can be seen from areas throughout the County. Additionally, SR 104 is viewed as a scenic corridor in Ione (Ione 2009).

Argonaut High School Site Improvements

The proposed improvements would be made on the existing school campus and would maintain the design features and visual appearance of the campus and surrounding areas. Development at Argonaut HS would support City of Jackson General Plan (Jackson 2008) Goal 4 and associated policies to preserve the character of scenic and historic routes; City of Jackson General Plan Update (Jackson 2023) Goal LU-2 and associated policies to manage growth to protect the community's natural and historical features; and Goal CIRC-4 and associated objective and policies aimed to preserve views along scenic and historic routes. The addition of a new 10-classroom, 2-story building and portable buildings would be similar in height and design to other buildings already on campus, such as the multi-purpose room and other 1- to 2-story buildings and similar in height to the 1- to 2-story residences in the surrounding neighborhood. The other improvements would be within the existing campus and would mostly involve new asphalt pavement and minimal grading which would not affect views. Additionally, building design, materials, and landscaping would be consistent with the existing school buildings and campus.

The new access point at Stony Creek Road would require grading and removal of bushes along Stony Creek Road. Views of this driveway would be similar to the existing driveway approximately 45 feet to the east of the proposed driveway and would not substantially alter views of the campus from Stony Creek Road.

The City of Jackson General Plan identifies a visual corridor along SR 88. The visual corridor overlay area nearest the project site is on the east side of SR-88 and not near Argonaut HS. Therefore, development of the improvements at Argonaut HS would not affect views of this area.

Therefore, the project improvements at Argonaut HS would have **less-than-significant** impacts on scenic vistas.

Ione Junior High School Site Improvements

The improvements would be made on the existing school campus and would maintain the design features and visual appearance of the campus and surrounding areas. Buildings would be a single story and would not be taller than what is already on campus, and building design, materials, and landscaping would be consistent with the existing school buildings and campus. The project site is 0.21 miles west of SR 104, viewed as the gateway to Ione. Due to existing development, vegetation and terrain, the proposed project would not be visible from SR 104, and therefore, the proposed project would not impact views from and of this corridor. Therefore, the project improvements at Ione Junior HS would have **less-than-significant** impacts on scenic vistas.

Sutter Creek Elementary School Site Improvements

Implementation of the proposed project would include constructing new classroom buildings and a lunch shelter in the southwest and center of Sutter Creek ES. The new building would be a 2-story structure and the improvements would be made on the existing school campus and would maintain the design features and visual appearance of the campus and surrounding areas. Current views of the Sierra Nevada would not be impacted. Additionally, building design, materials, and landscaping would be consistent with the existing school buildings

and campus. Therefore, the project improvements at Sutter Creek ES would have **less-than-significant** impacts on scenic vistas.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.1-2: The project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic Highway. [Threshold AE-2]

Argonaut High School Site Improvements

This project site is approximately 0.5 miles west of SR 49 and approximately 1.15 miles northwest of SR 88, both are portions with a designation of eligible as a Scenic Highway. Given the distance of the campus from SR 49 and SR 88 and intervening development and vegetation, the improvements would not be visible from these SRs. Improvements at Argonaut HS would be made on the existing school campus and would be visually compatible with the existing campus. The new access point at Stony Creek Road would require grading and removal of bushes along Stony Creek Road. Views of this driveway would be similar to the existing driveway approximately 45 feet to the east of the proposed driveway and would not require the removal of trees, rock outcroppings nor historic buildings. Though there is a rock outcropping located on campus that would need to be removed; its size, low-grade elevation, and surrounding building on the campus make it unable to be viewed from outside of campus.

Therefore, the site improvements would not alter the views from SR 49 or SR 88 nor any officially designated scenic highway. Therefore, impacts would be **less than significant**.

Ione Junior High School Site Improvements

This project site is approximately 6.8 miles west of SR 49 and approximately 8.2 miles northwest of SR 88. Given the distance of the campus from SR 49 and SR 88 and intervening development and vegetation, the improvements would not be visible from these SRs. Site improvements at Ione Junior HS would be made on the existing school campus and would be visually compatible with the existing campus. Therefore, the site improvements would not alter the views from SR 49 or SR 88 nor any officially designated scenic highway. Therefore, impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

This project site is approximately 0.3 miles east of SR 49 and approximately 4 miles north of SR 88. Given the distance of the campus from SR 49 and SR 88 and intervening development and vegetation, the improvements would not be visible from these SRs. Site improvements at Sutter Creek ES would be made on the existing school campus and would be visually compatible with the existing campus. Therefore, the site improvements would not alter the views from SR 49 or SR 88 nor any officially designated scenic highway Therefore, impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.1-3: The project would not substantially degrade the existing visual character or quality of public views of the site and its surroundings. (Public views are those that are experienced from a publicly accessible vantage point.) [Threshold AE-3]

The visual character of a project site includes scenic quality, scenic vistas, topography, and landscaping. A scenic vista generally refers to a view that possesses visual and aesthetic qualities of high value to the community. Aesthetic value is not limited to natural and rural viewsheds but can also be held in historic structures and districts, architectural design, and streetscapes.

An urbanized area, as defined by Public Resources Code Section 21071, is an incorporated city that either has a population of at least 100,000 persons or has a population of less than 100,000 persons and the population of that city and not more than two contiguous incorporated cities combined equals at least 100,000 persons. Jackson, Ione, and Sutter Creek are in a non-urbanized area, as Amador County in total in 2020 had a population of 40,474 persons (United States Census Bureau. 2022). Thus, this impact is analyzing if the project would substantially degrade the existing visual character or quality of public views of the site and its surroundings.

Construction at the three project sites with site improvements would result in a temporary change in visual character. Construction activities would include site clearing, grading and tree/vegetation removals, building, paving, and architectural finishings. Construction activities would require staging areas for stockpiles and construction equipment. Stockpiles and equipment would be staged on paved areas in the parking lots during the duration of construction. When not in use, stockpiles and equipment would be kept secure and generally out of view or reach from public rights of way with fencing and tarps. Construction of the proposed project would result in temporary views of typical construction activities. Therefore, construction impacts would be **less than significant.**

Argonaut High School Site Improvements

The improvements at Argonaut HS would be made on the existing school campus and would be consistent with the current visual appearance of the campus. As discussed above, views of the proposed driveway would be similar to the existing driveway approximately 45 feet to the east of the proposed driveway and would not substantially alter views of the campus from Stony Creek Road nor substantially change the existing visual character.

Therefore, development of the site improvements would not substantially alter views of the campus nor of the surrounding visual character. Therefore, impacts to visual character from the project improvements at Argonaut HS would be **less than significant.**

Ione Junior High School Site Improvements

The site improvements at Ione Junior HS would be made on the existing school campus and would be consistent with the visual appearance of the campus currently. Development of the site improvements would not substantially alter views of the campus nor of the surrounding visual character. Therefore, impacts to visual character from the project improvements at Ione Junior HS would be **less than significant.**

Sutter Creek Elementary School Site Improvements

The site improvements at Sutter Creek ES would be made on the existing school campus and would be consistent with the visual appearance of the campus currently. Development of the site improvements would not substantially alter views of the campus nor of the surrounding visual character. Therefore, impacts to visual character from the project improvements at Sutter Creek ES would be **less than significant.**

Impact 5.1-4: The proposed project would not generate a substantial new source of light and glare. [Threshold AE-4]

Light and glare impacts can affect a project's exterior lighting on adjacent uses and areas. Glare can also be generated by light reflecting off passing cars and large expanses of glass windows or other reflective surfaces. Excessive sunlight and glare can impair vision, cause annoyance, affect sleep patterns, and generate safety hazards when experienced by drivers. A significant impact may occur if lighting as part of the proposed project exceeds adopted thresholds for light and glare, including exterior lighting or light spillover, or if the proposed project creates a substantial new light source or glow. Light and glare impacts are determined by comparing the existing light and glare sources with the light and glare generated from the buildout of the proposed project.

Argonaut High School Site Improvements

The proposed building would be located towards the middle of campus and would be surrounded by existing campus buildings. Therefore, the proposed building would be similar in height and design as the existing buildings onsite. The combination of building materials along with its location on the campus, the proposed building would not generate a new substantial source of light or glare that could affect surrounding properties.

The proposed project would increase the number of vehicles traveling to and from the campus and parking onsite compared to existing conditions. Glare from parked cars would be similar to existing conditions and would not generate a new significant source of glare. Most activities occur during daylight hours, so headlights from vehicles would not significantly contribute to nighttime light.

Although the proposed project would introduce new light and glare sources to the area, the new light and glare sources would be similar to existing conditions and to neighboring uses. Considering the existing sources of light and glare in the surrounding area and currently onsite, the potential light and glare from site improvements would not be substantially greater or different from existing lighting in the surrounding area. Impacts related to light and glare associated with the proposed project component at Argonaut HS would be **less than significant**.

Ione Junior High School Site Improvements

The proposed site improvements, including the proposed buildings, would be located towards the center of the campus, next to the existing District warehouse building. The proposed building would be similar in height and design as the existing buildings onsite. Direct views of the new building and improvements would be limited from off-site residential uses to the north and northeast due to intervening structures and trees. The

combination of building materials along with its location on the campus, the proposed buildings would not generate a new substantial source of light or glare that could affect surrounding properties.

The proposed project would increase the number of vehicles traveling to and from the campus and parking onsite compared to existing conditions. A new pick-up/drop-off roundabout would be constructed on the southeast corner of the project site. Glare from cars would be similar to existing conditions and would not generate a new significant source of glare. School activities occur during daylight hours, so headlights from vehicles would not significantly contribute to nighttime light. Further existing vegetation, including trees, along with the varying topography and existing structures would shield views of vehicles during pick up/drop-off from surrounding properties. Therefore, the increase in vehicles onsite would not generate a new substantial source of light or glare.

Although the proposed project would introduce new light and glare sources to the area, the new light and glare sources would be similar to existing conditions and to neighboring uses. Considering the existing sources of light and glare in the surrounding area and currently onsite, the potential light and glare from site improvements would not be substantially greater or different from existing lighting in the surrounding area. Impacts related to light and glare associated with the proposed project component at Ione Junior HS would be **less than significant**.

Sutter Creek Elementary School Site Improvements

The proposed site improvements, including the proposed building, would be located in the southern part of campus and would be surrounded by existing campus buildings on three sides and Amador HS to the south. The proposed building would be similar in height and design as the existing buildings onsite. Direct views of the new building and improvements would be limited from off-site residential uses from the north and east due to intervening structures and trees. With the location of the proposed building on the campus and Amador HS being directly across the street, potential glare and light generated by the building would largely be blocked from surrounding residential properties. The proposed site improvements would not generate a new substantial source of light or glare that could affect surrounding properties.

Although the proposed project would introduce new light and glare sources to the area, the new light and glare sources would be similar to existing conditions and to neighboring uses. Considering the existing sources of light and glare in the surrounding area and currently onsite, the potential light and glare from site improvements would not be substantially greater or different from existing lighting in the surrounding area. Impacts related to light and glare associated with the proposed project component at Sutter Creek ES would be **less than significant**.

Level of Significance Before Mitigation: Less than significant impact.

5.1.4 Mitigation Measures

No mitigation measures are required.

5.1.5 Level of Significance After Mitigation

No mitigation measures are required, and the impacts remain less than significant.

5.1.6 Cumulative Impacts

Aesthetic impacts are localized to the project sites and their immediate surroundings. Other development projects would be required to comply with applicable State and local regulations, such as Title 24 (California Building Code), and be consistent with the applicable specific plans, zoning, and the jurisdiction's General Plan. Development projects would be subject to adopted plans and regulations that are in place to preserve a community's views, scenic resources, and visual character and would need to demonstrate compliance with the City's zoning and other regulations governing scenic quality and visual character. State scenic highways are not in the immediate vicinity of the three campuses with construction, and therefore the proposed project would not combine with another project to generate a cumulative impact to state scenic highways. Further, development projects would be expected to comply with applicable state and local regulations governing light and glare during construction and operation. If it is determined that a cumulative project would result in a potentially significant impact related to light or glare, it would be required to incorporate mitigation measures to reduce such effects. As discussed above, the proposed project would have a less than significant impact on light and glare. Therefore, the proposed project would not combine to contribute to a cumulative light and glare impact. Therefore, a **less-than-significant** cumulative impact would occur.

5.1.7 References

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5. Environmental Analysis
AESTHETICS

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5.2 AIR QUALITY

This chapter describes the existing air quality setting and evaluates the potential environmental impacts that could occur by developing the proposed project. Amador County is in the Amador Air District (AAD), which does not have adopted California Environmental Quality Act (CEQA) thresholds for air quality or greenhouse gas (GHG) emissions. Therefore, this chapter is based on the methodology recommended by the Sacramento Metropolitan Air Quality Management District (SMAQMD), in lieu of Amador County-specific guidance. The analysis focuses on air pollution from regional emissions and localized pollutant concentrations from development of the proposed project.

Construction criteria air pollutant emissions modeling can be found in Appendix C, *Air Quality and Greenhouse Gas Modeling*, of this Draft Environmental Impact Report (EIR).

"Emissions" refers to the actual quantity of pollutants, measured in pounds per day or tons per year. "Concentrations" refers to the amount of pollutant material per volumetric unit of air. Concentrations are measured in parts per million (ppm), parts per billion (ppb), or micrograms per cubic meter ($\mu g/m^3$).

5.2.1 Environmental Setting

5.2.1.1 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 federal Clean Air Act (CAA) and California CAA, respectively. The pollutants emitted into the ambient air by stationary and mobile sources are categorized as primary and/or secondary pollutants. Primary air pollutants are emitted directly from sources (e.g., combustion of fuels such as gasoline, oil and diesel). 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, CO, SO_2, nitrogen dioxide (NO_2), PM_{10}, and $PM_{2.5}$ are "criteria air pollutants," which means that ambient air quality standards (AAQS) have been established for them. ROG and NO_x are criteria pollutant precursors that form secondary criteria air pollutants through chemical and photochemical reactions in the atmosphere. Ozone (O_3) and NO_2 are the principal secondary pollutants. Table 5.2-1, *Criteria Air Pollutant Health Effects Summary*, summarizes the potential health effects associated with the criteria air pollutants.

Table 5.2-1 Criteria Air Pollutant Health Effects Summary

Pollutant	Health Effects	Examples of Sources
Carbon Monoxide (CO)	• Chest pain in heart patients • Headaches, nausea • Reduced mental alertness • Death at very high levels	Any source that burns fuel such as cars, trucks, construction and farming equipment, and residential heaters and stoves
Ozone (O_3)	• Cough, chest tightness • Difficulty taking a deep breath • Worsened asthma symptoms • Lung inflammation	Atmospheric reaction of organic gases with nitrogen oxides in sunlight

Table 5.2-1 Criteria Air Pollutant Health Effects Summary

Pollutant	Health Effects	Examples of Sources
Nitrogen Dioxide (NO_2)	• Increased response to allergens • Aggravation of respiratory illness	Same as carbon monoxide sources
Particulate Matter (PM_{10} and $PM_{2.5}$)	• Hospitalizations for worsened heart diseases • Emergency room visits for asthma • Premature death	Cars and trucks (particularly diesels) Fireplaces and woodstoves Windblown dust from overlays, agriculture, and construction
Sulfur Dioxide (SO_2)	• Aggravation of respiratory disease (e.g., asthma and emphysema) • Reduced lung function	Combustion of sulfur-containing fossil fuels, smelting of sulfur-bearing metal ores, and industrial processes
Lead (Pb)	• Behavioral and learning disabilities in children • Nervous system impairment	Contaminated soil

Source: CARB 2023a.

- **Carbon Monoxide (CO)** is a colorless, odorless gas produced by incomplete combustion of carbon substances, such as gasoline or diesel fuel. CO is a primary criteria air pollutant. The highest ambient CO concentrations are generally found near (300 to 600 feet) traffic-congested corridors and intersections. Overall, CO emissions are decreasing because of the Federal Motor Vehicle Control Program, which has mandated increasingly lower emission levels for vehicles manufactured since 1973. CO concentrations tend to be the highest during winter mornings with little to no wind, when surface-based inversions trap the pollutant at ground levels; therefore, California has required the use of oxygenated gasoline in the winter months to reduce CO emissions (Amador County 2016).

- **Reactive Organic Gases (ROGs)/Volatile Organic Compounds (VOCs)** are compounds composed primarily of hydrogen and carbon atoms. Internal combustion associated with motor vehicle usage is the major source of ROGs. Other sources of ROGs include evaporative emissions from paints and solvents, the application of asphalt paving, and the use of household consumer products such as aerosols. Adverse effects on human health are not caused directly by ROGs, but rather by reactions of ROGs to form secondary pollutants such as O_3. There are no AAQS established for ROGs. However, because they contribute to the formation of O_3, SMAQMD has established an operational significance threshold for this pollutant (SMAQMD 2020a).

- **Nitrogen Oxides (NO_X)** are a by-product of fuel combustion and contribute to the formation of O_3, PM_{10}, and $PM_{2.5}$. NO_2 is a gas that is a product of the combustion of fossil fuels generated from vehicles and stationary sources, such as power plants and boilers. NO_2 can cause lung damage and is a type of NO_X that is a principal contributor to ozone and smog production (Amador County 2016).

- **Sulfur Dioxide (SO_2)** is a colorless, pungent, irritating gas formed by the combustion of sulfurous fossil fuels, with the primary source being power plants and heavy industry that use coal or oil as fuel. Gasoline and natural gas have very low sulfur content and do not release significant quantities of SO_2. The human health effects of SO_2 include lung disease and breathing problems for asthmatics. When SO_2 forms sulfates (SO_4) in the atmosphere, together these pollutants are referred to as sulfur oxides (SO_X). Thus, SO_2 is both

a primary and secondary criteria air pollutant. SO_2 in the atmosphere contributes to the formation of acid rain. In the Mountain Counties Air Basin (MCAB), there is relatively little combustion of goal and oil; therefore, SO_2 is less of a concern than in other parts of the country (Amador County 2016).

- **Suspended Particulate Matter (PM_{10} and $PM_{2.5}$)** consists of finely divided solids or liquids such as soot, dust, aerosols, fumes, and mist. Natural sources of PM include windblown dust and ocean spray. Secondary particles result from gases that are transformed into particles through physical and chemical processes in the atmosphere.

  The size of PM is directly linked to the potential for causing health problems. The United States Environmental Protection Agency (USEPA) is concerned about particles that are 10 micrometers in diameter or smaller because those are the particles that generally pass through the throat and nose and enter the lungs. Once inhaled, these particles can affect the heart and lungs and cause serious health effects, such as aggravation of respiratory and cardiovascular disease, lung disease, decreased lung function, asthma attacks, and certain cardiovascular problems, such as heart attacks and irregular heartbeat. Individuals particularly sensitive to fine particle exposure include older adults, people with heart and lung disease, and children. USEPA groups PM into two categories, coarse PM or PM_{10}, and fine PM or $PM_{2.5}$, as described below.

  PM_{10}, such as found near roadways and dusty industries, are 10 micrometers or smaller in diameter. Sources of PM_{10} include crushing or grinding operations and dust from paved or unpaved roads. Control of PM_{10} is primarily achieved through the control of dust at construction and industrial sites, the cleaning of paved roads, and the wetting or paving of frequently used unpaved roads.

  $PM_{2.5}$, such as found in smoke and haze, are 2.5 micrometers or smaller in diameter. $PM_{2.5}$ poses an increased health risk because they can deposit deep in the lungs and contain substances that are particularly harmful to human health. Sources of $PM_{2.5}$ include all types of combustion activities, such as motor vehicles, power plants, wood burning, and certain industrial processes. $PM_{2.5}$ is the major cause of reduced visibility (haze) in California (Amador County 2016).

- **Ozone (O_3)** is a colorless, odorless gas that primarily exists in the upper atmosphere (stratosphere) as the ozone layer and in the lower atmosphere (troposphere) as a pollutant. Tropospheric ozone is a principal cause of lung and eye irritation in the urban environment and is the principal component of smog, which is formed in the troposphere through a series of reactions involving ROG and NO_X in the presence of sunlight. Therefore, ROG and NO_X are precursors of ozone. ROG and NO_X emissions are both considered critical in ozone formation. Control strategies for ozone have focused on reducing these emissions from vehicles, industrial processes using solvents and coatings, and consumer products. Ozone concentrations are generally highest in the summer, when atmospheric inversions are greatest, and sunlight is abundant and temperatures are high (Amador County 2016).

- **Lead (Pb)** is a highly toxic metal found naturally in the environment as well as in manufactured products. The major sources of lead emissions have historically been lead anti-knock additives in gasoline and industrial sources. As a result of the phasing out of leaded gasoline, metal processing is currently the

primary source of lead emissions. The highest levels of lead in air are generally found near lead smelters. Additionally, lead-based paint is a health hazard when it deteriorates by peeling, chipping, or cracking; or generates lead dust when scraped, sanded, or heated (Amador County 2016).

Toxic Air Contaminants

The California Health and Safety Code defines a toxic air contaminant (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 CAA (42 United States Code [USC] Section 7412[b]) is a TAC. People exposed to toxic air pollutants at sufficient concentrations and durations may have an increased chance of getting cancer or experiencing other serious health effects. These health effects can include damage to the immune system, as well as neurological, reproductive (e.g., reduced fertility), developmental, respiratory, and other health problems (USEPA 2023a). The California Air Resources Board (CARB) has identified over 200 substances and groups of substances as TACs (CARB 2023b). Additionally, CARB has implemented control measures for a number of compounds that pose high risks and show potential for effective control measures. The majority of the estimated health risks from TACs can be attributed to relatively few compounds. The most important compounds are particulate matter from diesel-fueled engines.

In 1998, CARB identified diesel particulate matter (DPM) as a TAC. Previously, the individual chemical compounds in diesel exhaust were considered TACs. Almost all diesel exhaust particles are 10 microns or less in diameter. Because of their extremely small size, these particles can be inhaled and eventually trapped in the bronchial and alveolar regions of the lungs.

Existing Conditions

Mountain Counties Air Basin Conditions

California is divided geographically into air basins for the purpose of managing the air resources of the state on a regional basis. An air basin generally has similar meteorological and geographic conditions throughout. The state is divided into 15 air basins and Amador County is in the MCAB.

The discussion below identifies the natural factors in the MCAB that affect air pollution and the regulatory framework that is potentially applicable to the proposed project. Air pollutants of concern are criteria air pollutants and TACs. Federal, State, and local air districts have adopted laws and regulations intended to control and improve air quality.

AAD is the regional air quality agency for the MCAB, which comprises Plumas, Sierra, Nevada, Amador, Calaveras, Tuolumne, Mariposa, Placer (middle portion), and El Dorado (western portion) Counties. Air quality in this area is determined by such natural factors as topography, meteorology, and climate, in addition to the presence of existing air pollution sources and ambient conditions.

Meteorology

The MCAB lies along the northern Sierra Nevada Mountain range, covering an area of approximately 11,000 square miles. Elevations in Amador County range from over 9,000 feet at the Sierra crest down to several hundred feet above sea level at the county's boundary with Sacramento County. Topography is highly variable throughout the county and includes rugged mountain peaks and valleys with extreme slopes and elevation variations in the Sierra range, as well as rolling foothills to the west. The general climate of the MCAB varies considerably with elevation and proximity to the Sierra range. The terrain features of the MCAB allow for several climates to exist in relative proximity (Amador County 2016).

Wind Patterns

The terrain of mountains and hills results in a wide variation in rainfall, temperature, and localized winds throughout the MCAB. Temperature variations have an important influence on basin wind flow, dispersion along mountain ridges, vertical air mixing, and photochemistry (Amador County 2016).

Temperature

Winter temperatures in the mountains can be below freezing for weeks at a time, and substantial amounts of snow can accumulate, but in the western foothills, winter temperatures usually drop below freezing only at night and precipitation is mixed as rain or light snow. In the summer, temperatures in the mountains are mild, with daytime highs in the 70s to low 80s (degrees Fahrenheit [°F]), but the western end of the county can routinely exceed 100°F. From an air quality perspective, the topography and meteorology of the MCAB combine such that local conditions are the predominate factor in determining the effect of emissions in the MCAB (Amador County 2016).

Precipitation

The Sierra Nevada Mountain range receives large amounts of precipitation from storms moving inland from the Pacific Ocean in the winter, with lesser amounts from intermittent "Monsoonal" moisture flows from the south and cumulus buildup in the summer. Precipitation amounts are high in the highest mountain elevations but decline rapidly toward the western portion of the MCAB (Amador County 2016).

Wind Circulation

Regional airflows are affected by the mountains and hills, which direct surface air flows, cause shallow vertical mixing, and create areas of high pollutant concentrations by hindering dispersion (Amador County 2016).

Inversions

Inversion layers, where warm air inversely overlays cooler air, frequently occur in the MCAB and trap pollutants close to the ground. During summer's longer daylight hours, stagnant air, high temperatures, and plentiful sunlight provide the conditions and energy for the photochemical reaction between ROGs and NO_X that results in the formation of ozone. Because of its long formation time, ozone is a regional pollutant rather than a local

hotspot problem. In the summer, the strong upwind valley air flowing into the basin from the Central Valley to the west is an effective transport medium for ozone precursors and ozone generated in the Bay Area and the Sacramento and San Joaquin Valleys (Amador County 2016).

Attainment Status of the MCAB

The Air Quality Management Plan provides the framework for air quality basins to achieve attainment of the State and federal AAQS through the State Implementation Plan. Areas that meet AAQS are classified as attainment areas, and areas that do not meet these standards are classified as nonattainment areas. Severity classifications for O_3 range from marginal, moderate, and serious to severe and extreme.

- **Unclassified:** A pollutant is designated unclassified if the data are incomplete and does not support a designation of attainment or nonattainment.
- **Attainment:** A pollutant is in attainment if the AAQS for that pollutant was not violated at any site in the area during a three-year period.
- **Nonattainment:** A pollutant is in nonattainment if there was at least one violation of an AAQS for that pollutant in the area.
- **Nonattainment/Transitional:** A subcategory of the nonattainment designation. An area is designated nonattainment/transitional to signify that the area is close to attaining the AAQS for that pollutant.

The attainment status for the MCAB is shown in Table 5.2-2, *Attainment Status of Criteria Pollutants in the MCAB*. The MCAB is currently designated a nonattainment area for California and national O_3.

Table 5.2-2 Attainment Status of Criteria Air Pollutants in the MCAB

Pollutant	State	Federal
Ozone – 1-hour	Nonattainment	No Federal Standard
Ozone – 8-hour	Nonattainment	Nonattainment
PM_{10}	Unclassified	Unclassified
$PM_{2.5}$	Unclassified	Unclassified/Attainment
CO	Unclassified	Unclassified/Attainment
NO_2	Attainment	Unclassified/Attainment
SO_2	Attainment	Unclassified/Attainment
Lead	Attainment	Unclassified/Attainment
All others	Unclassified/Attainment	Unclassified/Attainment

Sources: CARB 2023c; USEPA 2023b.

Existing Ambient Air Quality

Existing levels of ambient air quality and historical trends and projections in the vicinity of the project area have been documented and measured by the AAD. The nearest air quality monitoring station closest to the project site is the Jackson-Clinton Road Monitoring Station, which monitors O_3. The San Andreas-Gold Strike Road Monitoring Station was used to supplement data on $PM_{2.5}$ and PM_{10}. Table 5.2-3, *Ambient Air Quality Monitoring Summary*, shows regular violations of the State and federal O_3 standards, State PM_{10}, and federal $PM_{2.5}$ standard.

Table 5.2-3 Ambient Air Quality Monitoring Summary

Pollutant/Standard	Number of Days Thresholds Were Exceeded and Maximum Levels [1]		
	2019	2020	2021
Ozone (O_3)			
State 1-Hour ≥ 0.09 ppm (days exceed threshold)	0	2	0
State and Federal 8-hour ≥ 0.070 ppm (days exceed threshold)	2	3	4
Max. 1-Hour Conc. (ppm)	0.084	0.109	0.094
Max. 8-Hour Conc. (ppm)	0.075	0.088	0.080
Coarse Particulates (PM_{10})			
State 24-Hour > 50 µg/m^3 (days exceed threshold)	0	30	8
Federal 24-Hour > 150 µg/m^3 (days exceed threshold)	0	4	0
Max. 24-Hour Conc. (µg/m^3)	47.6	217.3	121.4
Fine Particulates ($PM_{2.5}$)			
Federal 24-Hour > 35 µg/m^3 (days exceed threshold)	0	23	7
Max. 24-Hour Conc. (µg/m^3)	24.8	134.2	94.3

Source: CARB 2023d.
Notes: ppm = parts per million; ppb = parts per billion; µg/m^3 = micrograms per cubic meter; * = Data not available
[1] O_3 data obtained from the Jackson-Clinton Road Monitoring Station. $PM_{2.5}$ and PM_{10} data obtained from the San Andreas-Gold Strike Road Monitoring Station.

Existing Emissions

As described in Section 3.1.2, *Project Site*, in Chapter 3, *Project Description*, there are eight existing operational ACUSD school campuses that are part of the proposed project. Thus, the project site currently generates criteria air pollutant emissions from area sources (e.g., consumer cleaning products, landscaping equipment, paints), energy sources (e.g., natural gas used for heating), and mobile sources (e.g., staff, student, and visitor vehicle trips) from existing school campuses.

Sensitive Receptors

Some land uses are considered more sensitive to air pollution than others due to the types of population groups or activities involved. Sensitive population groups for the purposes of air quality analysis include children, the elderly, the acutely ill, and the chronically ill, especially those with cardiorespiratory diseases.

Residential areas are also considered sensitive receptors to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to any pollutants present. Other sensitive receptors for the purposes of air quality analysis include retirement facilities, hospitals, and schools. Recreational land uses are considered moderately sensitive to air pollution. Although exposure periods are generally short, exercise places a high demand on respiratory functions, which can be impaired by air pollution. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial, commercial, retail, and office areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent since the majority of the workers tend to stay indoors most of the time. In addition, the working population is generally the healthiest segment of the population.

Argonaut High School Site Improvements

Sensitive receptors to the Argonaut HS campus pertaining to the following air quality analysis include the single-family residences to the north along Westview Drive.

Ione Junior High School Site Improvements

Sensitive receptors to the Ione Junior HS campus include the single-family residences to the north along S. Mills Street and Catholic Cemetery to the east.

Sutter Creek Elementary School Site Improvements

Sensitive receptors to the Sutter Creek ES campus include the single-family residences to the north along Sutter lone Road, to the east along Spanish Street, and to the west along Oro Madre Way, and Amador HS directly to the south.

5.2.1 Regulatory Background

Federal, State, and local air districts have passed laws and regulations intended to control and enhance air quality. Land use in the county is subject to the rules and regulations imposed by USEPA, CARB, the California Environmental Protection Agency (CalEPA), AAD, and SMAQMD. Federal, State, regional, and local laws, regulations, plans, or guidelines that are potentially applicable to the proposed project are summarized herein.

5.2.2.1 FEDERAL AND STATE

AAQS have been adopted at federal and state levels for criteria air pollutants. In addition, both the federal and State governments regulate the release of TACs. The Amador County Unified School District (ACUSD) is the only public school district serving Amador County and is subject to the rules and regulations imposed by the AAD, the national AAQS adopted by the USEPA, and the California AAQS adopted by CARB and CalEPA.

Ambient Air Quality Standards

The CAA was passed in 1963 by the United States Congress and has been amended several times. The 1970 CAA amendments strengthened previous legislation and laid the foundation for the regulatory scheme of the 1970s and 1980s. In 1977, Congress again added several provisions, including nonattainment requirements for

areas not meeting national AAQS and the Prevention of Significant Deterioration program. The 1990 amendments represent the latest in a series of federal efforts to regulate the protection of air quality in the United States. The CAA allows states to adopt more stringent standards or to include other pollution species. The California CAA, signed into law in 1988, requires all areas of the state to achieve and maintain the California AAQS by the earliest practical date. The California AAQS tends to be more restrictive than the national AAQS, based on even greater health and welfare concerns.

Both California and the federal government have established health-based AAQS for seven air pollutants, which are shown in Table 5.2-4, *Ambient Air Quality Standards for Criteria Pollutants*. These national AAQS 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 "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.

Table 5.2-4 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard [1]	Federal Primary Standard [2]	Major Pollutant Sources
Ozone (O_3) [3]	1 hour	0.09 ppm	*	Motor vehicles, paints, coatings, and solvents.
	8 hours	0.070 ppm	0.070 ppm	
Carbon Monoxide (CO)	1 hour	20 ppm	35 ppm	Internal combustion engines, primarily gasoline-powered motor vehicles.
	8 hours	9.0 ppm	9 ppm	
Nitrogen Dioxide (NO_2)	Annual Arithmetic Mean	0.030 ppm	0.053 ppm	Motor vehicles, petroleum-refining operations, industrial sources, aircraft, ships, and railroads.
	1 hour	0.18 ppm	0.100 ppm	
Sulfur Dioxide (SO_2)	Annual Arithmetic Mean	*	0.030 ppm	Fuel combustion, chemical plants, sulfur recovery plants, and metal processing.
	1 hour	0.25 ppm	0.075 ppm	
	24 hours	0.04 ppm	0.14 ppm	
Respirable Coarse Particulate Matter (PM_{10})	Annual Arithmetic Mean	20 µg/m^3	*	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	50 µg/m^3	150 µg/m^3	
Respirable Fine Particulate Matter ($PM_{2.5}$) [4]	Annual Arithmetic Mean	12 µg/m^3	12 µg/m^3	Dust and fume-producing construction, industrial, and agricultural operations, combustion, atmospheric photochemical reactions, and natural activities (e.g., wind-raised dust and ocean sprays).
	24 hours	*	35 µg/m^3	

5. Environmental Analysis
AIR QUALITY

Table 5.2-4 Ambient Air Quality Standards for Criteria Pollutants

Pollutant	Averaging Time	California Standard [1]	Federal Primary Standard [2]	Major Pollutant Sources
Lead (Pb)	30-Day Average	1.5 µg/m^3	*	Present source: lead smelters, battery manufacturing, and recycling facilities. Past source: combustion of leaded gasoline.
	Calendar Quarter	*	1.5 µg/m^3	
	Rolling 3-Month Average	*	0.15 µg/m^3	
Sulfates (SO_4) [5]	24 hours	25 µg/m^3	*	Industrial processes.
Visibility-Reducing Particles	8 hours	ExCo =0.23/km visibility of 10≥ miles	*	Visibility-reducing particles consist of suspended particulate matter, which is a complex mixture of tiny particles that consists of dry solid fragments, solid cores with liquid coatings, and small droplets of liquid. These particles vary greatly in shape, size, and chemical composition, and can be made up of many different materials such as metals, soot, soil, dust, and salt.
Hydrogen Sulfide (H_2S)	1 hour	0.03 ppm	*	Hydrogen sulfide (H_2S) is a colorless gas with the odor of rotten eggs. It is formed during bacterial decomposition of sulfur-containing organic substances. Also, it can be present in sewer gas and some natural gas and can be emitted as the result of geothermal energy exploitation.
Vinyl Chloride	24 hours	0.01 ppm	*	Vinyl chloride (chloroethene), a chlorinated hydrocarbon, is a colorless gas with a mild, sweet odor. Most vinyl chloride is used to make polyvinyl chloride (PVC) plastic and vinyl products. Vinyl chloride has been detected near landfills, sewage plants, and hazardous waste sites, due to microbial breakdown of chlorinated solvents.

Source: CARB 2016.
Notes: ppm: parts per million; µg/m^3: micrograms per cubic meter; ExCo: Extinction Conversion.
* Standard has not been established for this pollutant/duration by this entity.
[1] California standards for O_3, CO (except 8-hour Lake Tahoe), SO_2 (1 and 24 hour), NO_2, and particulate matter (PM_{10}, $PM_{2.5}$, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.
[2] National standards (other than O_3, PM, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The O_3 standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM_{10}, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 µg/m^3 is equal to or less than one. For $PM_{2.5}$, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard.
[3] On October 1, 2015, the national 8-hour ozone primary and secondary standards were lowered from 0.075 to 0.070 ppm.
[4] On December 14, 2012, the national annual $PM_{2.5}$ primary standard was lowered from 15 µg/m^3 to 12.0 µg/m^3. The existing national 24-hour $PM_{2.5}$ standards (primary and secondary) were retained at 35 µg/m^3, as was the annual secondary standard of 15 µg/m^3. The existing 24-hour PM_{10} standards (primary and secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.
[5] On June 2, 2010, a new 1-hour SO_2 standard was established, and the existing 24-hour and annual primary standards were revoked. The 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

California has also adopted a host of other regulations that reduce criteria pollutant emissions, including:[1]

- Assembly Bill (AB) 1493: Pavley Fuel-Efficiency Standards
- Heavy-Duty (Tractor-Trailer) GHG Regulation
- Advanced Clean Cars Regulation
- Advanced Clean Fleets Regulation
- Senate Bill (SB) 1078 and SB 107: Renewables Portfolio Standards
- Title 20 California Code of Regulations (CCR): Appliance Energy Efficiency Standards
- Title 24, Part 6, CCR: Building Energy Efficiency Standards
- Title 24, Part 11, CCR: Green Building Standards Code

Tanner Air Toxics Act and Air Toxics "Hot Spot" Information and Assessment Act

Public exposure to TACs is a significant environmental health issue in California. In 1983, the California Legislature enacted a program to identify the health effects of TACs and reduce exposure to these contaminants to protect public health. A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal CAA (42 USC Section 7412[b]) is a TAC. Under State law, CalEPA, acting through CARB, is authorized to identify a substance as a TAC if it 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.

California regulates TACs primarily through Assembly Bill (AB) 1807 (Tanner Air Toxics Act) and AB 2588 (Air Toxics "Hot Spot" Information and Assessment Act of 1987). AB 1807 sets up a formal procedure for CARB to designate substances as TACs. Once a TAC is identified, CARB adopts an "airborne toxics control measure" for sources that emit designated TACs. If there is a safe threshold for a substance (i.e., a point below which there is no toxic effect), the airborne toxics control measure must reduce exposure to below that threshold. If there is no safe threshold, the airborne toxics control measure must incorporate toxics best-available control technology to minimize emissions. To date, CARB has established formal control measures for 11 TACs that are identified as having no safe threshold.

Under AB 2588, TAC emissions from individual facilities are quantified and prioritized by the air quality management district or air pollution control district. High-priority facilities[2] are required to perform a health risk assessment, and if specific thresholds are exceeded, are required to communicate the results to the public through notices and public meetings.

[1] See Chapter 5.7, *Greenhouse Gas Emissions*, of this Draft EIR for a description of regulations that reduce emissions, including Assembly Bill 32, also known as the Global Warming Solutions Act, Senate Bill 375, also known as the Sustainable Communities and Climate Protection Act. See Chapter 5.15, *Transportation*, of this Draft EIR for a description on Senate Bill 743, and how it relates to reducing vehicle miles traveled (VMT).

[2] Each district is responsible for establishing the prioritization score threshold at which facilities are required to prepare a health risk assessment. Types of facilities that have the potential to generate risks of this level include refineries, other heavy industrial manufacturing/industrial processes, and fueling stations.

CARB has promulgated the following specific rules to limit TAC emissions:

- Title 13, CCR Chapter 10, Section 2485, Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- Title 13, CCR Chapter 10, Section 2480, Airborne Toxic Control Measure to Limit School Bus Idling and Idling at Schools
- Title 13, CCR Section 2477 and Article 8, Airborne Toxic Control Measure for In-Use Diesel-Fueled Transport Refrigeration Units (TRU) and TRU Generator Sets and Facilities Where TRUs Operate

Idling Restrictions

Section 2449 of the CCR, Title 13, Article 4.8, Chapter 9, was adopted on May 2, 2008, that limits nonessential idling of fleets to no more than five consecutive minutes at any location. This idling restriction applies to all vehicles in California with a diesel-fueled or alternative diesel-fueled off-road engine, unless a waiver provides sufficient justification that such idling is necessary. The airborne toxic control measure helps reduce public exposure to NO_X, DPM, and other criteria pollutant emissions from off-road diesel-fueled vehicles.

5.2.2.2 REGIONAL

Amador County General Plan

The Amador County General Plan Conservation Element establishes air quality policies designed to help maintain air pollution to levels consistent with standards set by the State and federal governments (Amador County 2016). Amador County can help maintain its good air quality by modifying development patterns and offering alternative transportation options, as well as encouraging energy conservation and efficiency. Conservation Element goals and policies regarding air quality are:

- **Goal C-9:** Maintain and improve air quality.
- **Policy C-9.1:** Encourage development of commercial or industrial businesses which provide jobs for county residents in order to reduce vehicle miles traveled for residents who must drive elsewhere for employment.
- **Policy C-9.2:** Encourage infill development, and development near existing activity centers in order to encourage walking or bicycle use in running local errands.
- **Policy C-9.3**: Promote the separation of emission sources from sensitive receptors such as schools, day care centers, and health care facilities.
- **Policy C-9.4:** Encourage energy conservation and energy efficient design in new development projects.
- **Policy C-9.5:** Promote recycling of waste materials and the use of recycled materials.

- **Policy C-9.6:** Maintain viable public transportation options in Amador County, and provide transit connections such as park-and-ride services to job centers in nearby counties.
- **Policy C-9.7:** Work with state and federal agencies to seek recognition of air pollutant movement from valley to mountain counties as a contributor to reduced air quality.

Amador County Municipal Code

Amador County Municipal Code (ACMC) includes various directives to minimize adverse impacts related to air quality impacts within the county. The ACMC is organized by title, chapter, and section. Most provisions related to air quality are included in Title 15, *Buildings and Construction,* and Title 19, *Zoning,* as follows:

- **Chapter 15.40, Erosion Control Ordinance.** Section 15.40.040, *Inspection and Enforcement*, establishes that the building department has jurisdiction over permitting, inspecting, and enforcing erosion control measures and grading permits pertaining to site specific grading.
- **Chapter 19.24, District Regulations.** Section 19.24.049, *Scenic Highway Corridor Overlay District*, requires a landscaping plan to include existing mature trees and indication of where proposed plant vegetation and type of vegetation. As a condition of the approval of a landscaping plan the county may require the planting of native species of trees and shrubs to ensure high survival rates and low maintenance.

Amador Air District

AAD is the agency responsible for ensuring that the national and California AAQS are attained and maintained in the MCAB by regulating air pollutant emissions from stationary and industrial sources. These responsibilities are met by adopting and enforcing Rules and Regulations concerning air pollutant sources, issuing permits for stationary sources of air pollutants, and inspecting stationary sources of air pollutants.

AAD's Rules and Regulations include, but are not limited to:

- Rule 202 – Visible emissions
- Rule 205 – Nuisance
- Rule 207 – Particulate Matter
- Rule 210 – Specific Contaminants (sulfur compounds, combustion contaminants)
- Rule 218 – Fugitive Dust Emissions
- Regulation IV – Authority to Construct
- Regulation V – Permit to Operate

Amador County Transportation Commission

The Amador County Transportation Commission (ACTC) is the State-designated Regional Transportation Planning Agency (RTPA) and Local Transportation Commission (LTC) serving the Amador region (ACTC 2023). As the region's LTC, ACTC oversees use of local transportation funds pursuant to the State's Transportation Development Act (TDA) for funding public transit and other purposes.

Additionally, ACTC is responsible for adopting and maintaining the County's Regional Transportation Plan (RTP). The latest 2020 RTP Update reflects progress toward implementing the 2015 RTP and ensures compliance with the California Transportation Commission's 2017 Regional Transportation Guidelines (ACTC 2020). The RTP identifies the region's short-term and long-range transportation needs and establishes policies, programs, and projects designed to meet those needs for the next 20 years.

5.2.2.3 LOCAL

City of Ione General Plan

The City of Ione General Plan is the primary planning document for the City. It sets goals, policies, and actions concerning the community and directs growth and development. Goals, policies, and actions related to air quality are as follows (City of Ione 2009):

- **Policy CO-6:** Conserve the natural resources and quality of life within the community by reducing local and global air quality impacts.
- **Policy CO-6.1:** Promote infill development as a means to limit vehicle trips and reduce the environmental impacts of new development and land use patterns.
- **Policy CO-6.5:** The City supports local, regional, and statewide efforts to reduce the emission of greenhouse gases linked to climate change.
- **Action CIR-1.1.4:** All new roadways and roadways that are being expanded must include sidewalks for pedestrians. In addition, crosswalks adequate to ensure pedestrian safety must be provided as determined by the City Engineer.
- **Goal CIR-2:** Establish an extensive, complete, smooth, interconnected, and continuous pedestrian and bicycle network that is a safe and attractive option for local trips or recreation and that connects to the City's neighborhoods, parks and schools, employment areas, and retail centers.
- **Policy CIR-2.3:** Require bicycle and pedestrian connections to public transit systems at stops; carpool/vanpool park-and-ride lots; and activity centers (e.g., schools, community centers, higher-density residential areas, Downtown, parks, employment centers, and commercial centers).
- **Policy CIR-2.7:** Provide bike lanes or other bike facilities along all arterials, connectors, and on local roadways when necessary and feasible to provide for interconnected routes. On-street bike routes may be provided on roadways as deemed necessary by the City.
- **Goal CO-3:** Preserve high-quality trees throughout the City.

City of Ione Municipal Code

Ione Municipal Code (IMC) includes various directives to minimize adverse impacts related to air quality impacts in Ione. The IMC is organized by title, article, chapter, and section. Most provisions related to air quality are included in Title 8, *Health and Safety,* and Title 18, *Environmental Protection,* as follows:

- **Chapter 8.04, Solid Waste Ordinance.** Section 8.04.250, *Burning of solid waste*, requires prohibition of burning of solid waste, unless regulated by the air pollution control district, state and local fire regulations, and the laws, rules or regulations of any other entity with jurisdiction.

- **Chapter 8.20, Protection of Tree Stock on Undeveloped Property and Heritage Trees and Street Trees on Developed Property.** This chapter establishes policy of the state to preserve trees and regulate the removal of trees within the city in order to preserve the scenic beauty, prevent soil erosion, protect against flood hazards and the risk of landslides, counteract the pollutants in the air and maintain the climatic balance within the city.

- **Chapter 18.16, Water Efficient Landscaping.** Section 18.16.120, *Grading design plan*, requires a comprehensive landscaping grading plan that would minimize soil erosion, runoff, and water waste. To prevent excessive erosion and runoff, it is highly recommended that project applicants:
  - Grade so that all irrigation and normal rainfall remains within property lines and does not drain onto non-permeable hardscapes;
  - Avoid disruption of natural drainage patterns and undisturbed soil; and
  - Avoid soil compaction in landscape areas.

City of Jackson General Plan

The City of Jackson General Plan is the primary planning document for the City. Circulation Element and Land Use Element goals, objectives, and policies related to air quality are outlined here (City of Jackson 2008a, 2008b):

Circulation Element

- **Objective 2.A:** To minimize traffic and congestion in the City of Jackson.

- **Policy 2.A.3**: The City shall require that new development's internal circulation plans include provisions for pedestrians, bicycles, automobiles, parking, and bus facilities as well as Neighborhood Electric Vehicles (NEVs) consistent with separately adopted alternative transportation plans and/or guidelines.

- **Goal 5:** Provide effective and efficient public transportation and reduce automobile dependency.

- **Policy 5.A.1:** The City shall encourage alternatives to single-occupant vehicle trips and make alternatives available to the extent deemed practical and economical.

- **Goal 6:** To provide a safe, comprehensive and integrated circulation system for non-motorized transportation.

- **Policy 6.A.2:** The City shall continue to require new development to construct sidewalks or meandering walkways along all street perimeters.

- **Policy 6.B.2:** Bicycle lanes shall be constructed along new or reconstructed arterial and collector routes in, or adjacent to, the City wherever possible.
- **Policy 6.B.4:** The City shall encourage existing businesses and employers to provide bicycle storage and lockers in order to promote bicycle commuter travel.

Land Use Element

- **Policy 1.8:** A balanced mix of housing, workplaces, shopping, recreational opportunities, and institutional uses, including mixed-use structures (combined residential and non-residential uses), that help to reduce vehicular trips shall be encouraged.
- **Policy 4.2:** To increase pedestrian access, development standards shall be created which require the installation of sidewalks for new development.

The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals, objectives, policies, and actions related to air quality are outlined here (Jackson 2023).

- **Policy LU 5-3:** Encourage projects that offer pedestrian scaled designs and walkability to reduce vehicle trips and parking demand within the downtown area.
- **Policy LU 7-2:** Consider environmental justice issues related to potential adverse health impacts associated with land use decisions, including methods to reduce exposure to hazardous materials, industrial activities, vehicle exhaust, other sources of pollution, and excessive noise on residents regardless of age, culture, gender, race, socioeconomic status, or geographic location.
- **Policy CIRC 2.3:** The City shall require that new development's internal circulation plans include provisions for pedestrians, bicycles, automobiles, parking, and bus facilities as well as Neighborhood Electric Vehicles (NEVs), if deemed feasible and beneficial, consistent with separately adopted alternative transportation plans and/or guidelines.
- **Policy CIRC 3.4:** The City shall minimize potential conflicts between trucks and pedestrian, bicycle, transit, and vehicle access and circulation on streets with truck travel.
- **Policy CIRC 5.1:** The City shall encourage alternatives to single-occupant vehicle trips and make alternatives available to the extent deemed practical and economical.
- **Goal CIRC-6:** To provide a safe, comprehensive and integrated circulation system for non-motorized transportation.
- **Objective 6.A:** Make bicycle and pedestrian travel an integral part of the City's circulation system.
- **Policy CIRC 6.1:** The City shall implement best practices to improve the pedestrian and bicycle environment.

- **Policy CIRC 6.9:** The City shall require new development to construct bicycle routes and/or provide secure facilities (i.e. bike racks), where feasible. To encourage biking and walking, provide amenities including pedestrian-scale lighting, bicycle parking, shade trees, and landscaping.
- **Policy CIRC 6.10:** The City shall encourage existing businesses and employers to provide bicycle storage and lockers in order to promote bicycle commuter travel.
- **Policy CIRC 8.1:** Support land use with increased densities and mixed uses, consistent with the Land Use Element, to reduce vehicle miles traveled (VMT) and promote the use of walking, biking, and transit.
- **Policy CIRC 8.4:** Support the creation of electric vehicle charging stations at commercial, government, and other employment and community destinations.
- **Policy COS 3.3:** Preserve existing native trees and vegetation where possible and integrate regionally native trees and plant species into development and infrastructure projects where appropriate.
- **Policy COS 3.7:** Strongly discourage the removal of healthy trees on public and private property.
- **Policy COS 5.2:** Support and encourage the implementation of innovative and green building best management practices (BMPs) including, but not limited to, sustainable site planning, solar opportunities, LEED certification, and exceeding the most current "green" development standards in the California Code of Regulations (CCR), Title 24, as feasible.
- **Policy COS 5.4:** As City fleet vehicles are replaced, procure alternative energy and fuel-efficient City vehicles and equipment that meet or surpass state emissions requirements, to the extent feasible.

City of Jackson Municipal Code

Jackson Municipal Code (JMC) includes various directives to minimize adverse impacts related to air quality impacts in Jackson. The JMC is organized by title, article, chapter, and section. Most provisions related to air quality are included in Title 12, *Streets and Sidewalks,* and Title 17, *Development Code,* as follows:

- **Chapter 12.12, Parks.** Section 12.12.057, *Tobacco restrictions*, requires prohibition of burning tobacco or in possession of tobacco related products in all current and future parks within the City of Jackson.
- **Chapter 17.30, General Property Development and Use Standards.** This chapter provides details of site planning and project design, to ensure that future development consider the community's natural resources and be consistent with the General Plan. Section 17.30.030, *Air Emissions*, ensures mitigation of air emissions from fugitive dust emissions, vehicle exhaust emissions, odor emissions, and cleared vegetation. Land use activities that may create dust emissions (for example, construction and grading) shall be conducted to limit visible emissions of fugitive dust at the point of its creation to less than 20 percent opacity. Appropriate procedures may include:
    - Dust suppression plan for which a grading plan is required;

- Grading activities shall be scheduled to ensure that repeated grading will not be required, and that implementation of the desired land use (e.g., construction, paving, or planting) will occur as soon as possible after grading;
- Clearing, earth-moving, excavation operations or grading activities shall cease when the sustained winds are above 15 mph;
- The area disturbed by clearing, demolition, earth-moving, excavation operations or grading shall be minimized at all times;
- During clearing, demolition, earth-moving, excavation operations, or grading, fugitive dust emissions shall be controlled by application of water to prevent visible dust emissions, paving of construction roads or other dust-preventive measures (e.g., hydro seeding, etc.), subject to the approval of the City Engineer;
- On-site roads shall be paved as soon as feasible, and watered periodically or chemically stabilized until the roads are paved. Access or haul roads adjoining the project shall be treated as necessary to prevent track-out and accumulation of dirt, soil, or other materials which can subsequently be entrained in ambient air, either from construction-related vehicles or from any vehicle using adjoining affected roads;
- For land use activities that disturb two or more acres of land, paved aprons onto City streets shall be required at all access encroachments onto the City street. The aprons shall be paved within one week of the commencement of grading on the site. The aprons and portions of the street adjacent to the apron shall be flushed and/or swept at least once daily;
- Graded areas shall be revegetated as soon as possible to minimize dust and erosion. Portions of the construction site to remain inactive longer than three months shall be seeded and watered until grass cover is grown and maintained;
- Appropriate fences or walls shall be constructed to permanently contain the dust and dirt within the parcel, subject to the approval of the City Planner;
- Other Best Available Control Technology (BACT) may be required by the City Engineer to control air emissions of particulate matter from the site; and
- The City Engineer may require a permit applicant to provide adequate performance guarantees (e.g., bonds, cash deposits, certified letter of credit, etc.) to ensure the faithful and timely performance of dust suppression measures during grading. The City Engineer shall be responsible for setting the amount of the required performance guarantee, after consultation with the City Building Official and the Amador County Air Pollution Control Officer.

- **Chapter 17.12, Commercial, Office, and Industrial Zoning Districts.** This chapter provides regulations applicable to existing development and new land uses in the commercial, office, and industrial zoning districts. Section 17.12.050, *Commercial and Manufacturing District Performance Standards*, requires that all proposed land uses in the Commercial, Office, and Industrial zoning districts shall be operated so as to not be injurious to public health, safety or welfare, and comply with the following standards:

- No approved land use shall generate or cause any visible dust, gasses, or smoke to be emitted into the atmosphere, except in accordance with the air quality regulations of the Amador Air District and the California Air Resources Board or for the operation of motor vehicles on the site.so that all irrigation and normal rainfall remains within property lines and does not drain onto non-permeable hardscapes;
- No direct or sky-reflected glare or heat, whether from floodlights or from high temperature processes (including combustion or welding or otherwise) shall be visible or felt at the property line.
- No approved land use shall generate ground vibration perceptible without instruments at any point along or outside of the property line of the use, except for motor vehicle operations.
- No approved land use shall generate or emit any obnoxious odor or fumes perceptible at the property line.

- **Chapter 17.32, Affordable Housing.** This chapter encourages development of affordable housing within the city's housing stock to offset the need for new development, promote a jobs/housing balance, mitigate environmental impacts of air quality, and reduce demands on the region's transportation infrastructure.

- **Chapter 17.40, Landscape Standards.** This chapter promotes planting and conservation of trees and landscaping. Grading and construction shall be planned to maximize the retention of established trees. These efforts will serve in a significant way to enhance aesthetic and economic values of the community, and to maximize the related effects of erosion control, ground water recharge, and local air quality.

City of Sutter Creek General Plan

The City of Sutter Creek General Plan is the primary planning document for the city. Objectives, policies, and implementation measures related to air quality are outlined here (City of Sutter Creek 2019a).

- **Objective COS-1.6:** Increased air quality.

- **Policy COS-1.6.1:** The City shall limit new industry to those that can demonstrate no harmful effect upon air quality.

- **Policy COS-1.6.2:** The City shall implement policies and implementation measures in the Circulation Element that reduce per capita reliance on automobile traffic and incidence of traffic congestion to minimize locally generated carbon monoxide and ozone air pollution.

- **Policy COS-1.6.3:** The City supports efforts of the Amador Air District to maintain local air quality and statewide efforts to lessen the impacts of pollution affecting the City from growth in the great Central Valley.

- **Implementation Measure COS-1.11.1.1:** The City shall focus on the following tasks to reduce emissions from the City's operations:

    - Reducing usage of city owned vehicles and replacing those that are not fuel efficient, and change procurement policy to specify high fuel efficiency for each vehicle class.

- Comprehensive energy efficiency retrofit of existing municipal buildings and facilities.
- Establish a purchasing policy requiring new electrical equipment to be Energy Star, or similarly, rated.
- Evaluate the potential to utilize solar renewable-energy systems to operate municipal facilities.
- Include energy-efficiency provisions in City-released RFPs related to wastewater infrastructure.
- Switch existing traffic signals and street lights from incandescent bulbs to Light Emitting Diodes (LEDs).
- Install water efficient landscaping in areas managed by the City and establish municipal water consumption reduction goals.
- Increase office recycling, e.g. paper, cardboard, cans, toner cartridges.
- Participate in PG&E's Phase II of Green Communities: Community-Wide Inventory.
- Evaluate the potential to implement methane capture system to utilize digester gas for electricity and heating at the wastewater treatment plant, as well as solar energy systems.

City of Sutter Creek Municipal Code

Sutter Creek Municipal Code (SCMC) includes various directives to minimize adverse impacts related to air quality impacts in Sutter Creek. The SCMC is organized by title, chapter, article, division, and section. Most provisions related to air quality are included in Title 9, *Health and Welfare*, and Title 13, *Trees and Landscaping,* as follows:

- **Chapter 9.16, Regulations of Fires and Burning.** Section 9.16.010, *Fire in public places prohibited*, ensures that no person shall ignite, maintain, or make a fire in a public place, except as authorized by the chief of police, fire chief or superintendent of streets.
- **Chapter 13.24, Trees and Landscaping.** This chapter is to provide a method for beautifying the city, to enhance air quality, and to do so in a water-efficient manner.

5.2.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

AQ-1 Conflict with or obstruct implementation of the applicable air quality plan.

AQ-2 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.

AQ-3 Expose sensitive receptors to substantial pollutant concentrations.

AQ-4 Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

Sacramento County Air Quality Management District Thresholds

CEQA allows the significance criteria established by the applicable air quality management district or air pollution control district to be used to assess impacts of a project on air quality. As mentioned in Section 4.3.3, *Climate and Air Quality*, in Chapter 4, *Environmental Setting*, since AAD does not have adopted CEQA thresholds for air quality, the SMAQMD thresholds of significance were used in the following analysis.

Table 5.2-5, *SMAQMD Significance Thresholds*, shows SMAQMD's 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.

Table 5.2-5 SMAQMD Significance Thresholds

Air Pollutant	Construction Phase	Operational Phase
Reactive Organic Gases (ROG)	NA	65 lbs/day
Nitrogen Oxides (NO_X)	85 lbs/day	65 lbs/day
Particulates (PM_{10})	0. If all feasible BACT/ BCECPs are applied, then 80 lbs/day.	0. If all feasible BACT/ BCECPs are applied, then 80 lbs/day.
Particulates ($PM_{2.5}$)	0. If all feasible BACT/ BCECPs are applied, then 82 lbs/day.	0. If all feasible BACT/ BCECPs are applied, then 82 lbs/day.

Source: SMAQMD 2020a.

Toxic Air Contaminants

In addition to criteria air pollutants, both the State and federal government regulate the release of TACs. The California Health and Safety Code define a TAC as "an air pollutant which may cause or contribute to an increase in mortality or in serious illness, or which may pose a present or potential hazard to human health." A substance that is listed as a hazardous air pollutant pursuant to Section 112(b) of the federal CAA (42 USC Section 7412[b]) is a TAC. Under State law, CalEPA, acting through 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.

Health Effects of Criteria Air Pollutants

If projects exceed the significance criteria in Table 5.2-5, emissions would cumulatively contribute to the nonattainment status and would contribute in 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. Reducing emissions would further contribute to reducing possible health effects related to criteria air pollutants.

However, for projects that exceed the thresholds in Table 5.2-5, it is speculative to determine how exceeding the regional thresholds would affect the number of days the region is in nonattainment since mass emissions are not correlated with concentrations of emissions or how many additional individuals in the MCAB would be affected by these health effects.

SMAQMD has 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 2020b). This guidance document was developed with input from Yolo-Solano AQMD, Placer County Air Pollution Control District (APCD), El Dorado County AQMD, and Feather River AQMD.

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. 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 pounds per day (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.

However, both tools use project location and consequently calculate the cumulative health risk for receptors within areas under the jurisdiction of SMAQMD, Yolo-Solano AQMD, Placer County APCD, El Dorado County AQMD, and Feather River AQMD. Therefore, the screening tools could not be used to evaluate health effects of criteria pollutant emissions associated with the proposed project within the MCAB. To achieve the health-based standards established by the USEPA, air districts prepare air quality management plans that detail regional programs to attain the AAQS. If the proposed project exceeds the regional significance thresholds, it could contribute to an increase in health effects in the basin until such time the attainment standards are met in the MCAB.

Odor Impacts

Since the AAD does not provide guidance for analysis of odor impacts, guidelines from SMAQMD are used for this analysis. SMAQMD has developed screening-level distances to potential major odor sources (e.g., wastewater treatment facilities, food processing facilities, landfills) (SMAQMD 2009). Other minor sources of odors (e.g., exhaust from mobile sources, garbage collection areas, and charbroilers associated with commercial uses) are not typically associated with numerous odor complaints, but are known to have some temporary, less concentrated odorous emissions.

CO Hotspot

AAD does not provide guidance for analysis of CO impacts; therefore, guidelines from SMAQMD are used for this analysis. SMAQMD have developed screening criteria to determine whether a proposed project would result in a CO hotspot. SMAQMD has established a two-tiered qualitative screening threshold to determine whether a project would have the potential to exceed the ambient air quality standard for CO (Amador County 2016).

The project would result in a less-than-significant impact on air quality for local CO if the following conditions are met:

First tier:

- Traffic generated by the proposed project would not result in deterioration of intersection level of service (LOS) to LOS E or F; or
- The proposed project would not contribute additional traffic to an intersection that already operates at LOS E or F.

If the first tier of screening criteria is not met, SMAQMD provides a second tier of screening criteria:

- The proposed project would not result in an affected intersection experiencing more than 31,600 vehicles per hour.
- The project would not contribute traffic to a tunnel, parking garage, bridge underpass, urban street canyon, below-grade roadway, or other locations where horizontal or vertical mixing of air would be substantially limited.
- The mix of vehicle types at the intersection is not anticipated to be substantially different from the County average.

If the project does not meet the above screening criteria discussed in SMAQMD's *CEQA Guide*, Section 4.3.2, then SMAQMD recommends using the On-Road Mobile-Source Emission Factors (EMFAC) and the California Line Source Dispersion Model (CALINE4) in accordance with the methodology recommended in the University California Davis Transportation Project-Level Carbon Monoxide Protocol (UC Davis CO Protocol).

Naturally Occurring Asbestos

Naturally occurring asbestos (NOA), which was identified as a TAC in 1986 by CARB, can become potentially airborne when disturbed by grading or blasting. Without appropriate controls, sensitive receptors near construction sites could be exposed to localized high levels of re-entrained fugitive PM_{10} dust, potentially including NOA. Applicable projects would be required to develop an Asbestos Dust Control Plan as required in Section 93105 of the California Health and Safety Code, including measures to reduce exposure consistent with Section 93105(d) and (e) of the California Health and Safety Code.

5.2.3 Environmental Impacts

Methodology

This air quality evaluation was prepared in accordance with the requirements of CEQA to determine if significant air quality impacts are likely to occur with the proposed project. The SMAQMD has published the CEQA Air Quality Guidelines that provides local governments with guidance for analyzing and mitigating air quality impacts and was used in this analysis.

Regional Emissions Modeling

Criteria air pollutant emissions modeling is included in Appendix C, *Air Quality and Greenhouse Gas Modeling*, of this Draft EIR.

The proposed project criteria air pollutant emissions inventory was modeled using the California Emissions Estimator Model (CalEEMod) Version 2022.1 and includes the following sectors:

- **On-Road Transportation.** Transportation emissions are based on the trip generation associated with the net increase in student population at Argonaut HS, Ione Junior HS, and Sutter Creek ES as provided by Kittelson & Associates (see Appendix C, of this Draft EIR). The fleet mix in CalEEMod was adjusted to reflect a higher proportion of passenger vehicles.
- **Area Sources.** Area sources generated from use of consumer products and cleaning supplies are based on CalEEMod default emission rates and on the assumed building square footage.
- **Energy.** The CalEEMod default energy rates were used for the proposed project.
- **Construction.** The project-related construction emissions are based on information provided by the District for the maximum development scenario (Argonaut HS site improvements). Construction is modeled to occur between winter 2024 to winter 2025 for an approximately 11-month duration, based on information provided by the District. The construction equipment mix is generally based on CalEEMod defaults.

Impact Analysis

Impact 5.2-1: The proposed project is consistent with the applicable air quality management plan. [Threshold AQ-1]

A consistency determination plays an important role in local agency project review by linking local planning and individual projects to the AAD portion of the California State Implementation Plan (SIP) (USEPA 2023c).

The SIP plans and control measures are based on information derived from regional growth projections based on general plans developed by the County of Amador to forecast future emission levels in the MCAB. As such, projects that are consistent with the County's General Plan and propose development consistent with the anticipated growth for the region would be consistent with the SIP. Changes in population, housing, or

employment growth projections have the potential to affect AAD's demographic projections and therefore the assumptions in SIP. Typically, only large, regionally significant projects have the potential to affect regional growth projections.

School Closure/Consolidation Program Project

The proposed project would require physical site improvements to occur at three ACUSD campuses to accommodate the consolidation of eight schools onto six current ACUSD campuses. As discussed in Section 5.12, *Population and Housing*, the students and staff that would occupy the proposed school buildings at each of the ACUSD campuses would be existing students within the ACUSD District and would not directly increase population growth in the project area. Furthermore, each of the proposed site improvements would be consistent with the applicable City's Zoning Plan. Therefore, the proposed project would not affect the regional emissions inventory or conflict with strategies in the SIP.

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

Argonaut High School Site Improvements

The proposed project would require site improvements at Argonaut HS campus to accommodate combining Amador and Argonaut HS. The proposed increase in enrollment capacity would accommodate students from Amador HS, and the site improvements at Argonaut HS would not directly increase population growth. Argonaut is currently zoned and has the land use designation of Public (Jackson 2014). Since Argonaut HS campus would continue to operate as a school, the site improvements at Argonaut HS would be consistent with the zoning and land use designation. As such, the site improvements at Argonaut HS would not affect the regional emissions inventory or conflict with strategies in the SIP. This impact would be **less than significant**.

Ione Junior High School Site Improvements

The proposed project would require site improvements at Ione Junior HS campus to accommodate the relocation of Ione Elementary and additional grade levels. The proposed increase in enrollment capacity would accommodate students from Ione ES, and the site improvements at Ione Junior HS would not directly increase population growth. Ione Junior HS campus is currently zoned as Public Facilities (PF) with a land use designation of Public Service (PS) (Ione 2018, 2009). Since Ione Junior HS campus would continue to operate as a school, the proposed site improvements to the Ione Junior HS campus would be consistent with the City of Ione's zoning and land use designation. As such, the proposed site improvements to the Ione Junior HS campus would not affect the regional emissions inventory or conflict with strategies in the SIP. This impact would be **less than significant**.

Sutter Creek Elementary School Site Improvements

The increase in enrollment capacity would accommodate students from Sutter Creek ES who stay on for more years and the site improvements at Sutter Creek ES would not directly increase population growth. Sutter Creek Elementary School is currently zoned as Public Service (PS) with a land use designation of Public Service (P-S) (Sutter Creek 2019a, 2019b). Since Sutter Creek ES campus would continue to operate as a school, the site improvements to the Sutter Creek ES campus would be consistent with the City of Sutter Creek's zoning and land use designation. As such, the proposed project would not affect the regional emissions inventory or conflict with strategies in the SIP. This impact would be **less than significant**.

Level of Significance Before Mitigation: Less-than-significant impact.

Impact 5.2-2: The proposed project would not result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is nonattainment under an applicable federal or State ambient air quality standard.

As stated, the MCAB is designated under the California and federal AAQS as nonattainment for ozone (CARB 2023c). 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* (AQ Guidelines) and *Guidance to Address the Friant Ranch Ruling for CEQA Projects in the Sac Metro Air District* (SMAQMD 2009, 2020b). 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.

School Closure/Consolidation Program Project

Construction activities would temporarily increase ROG, NO_X, CO, PM_{10}, and $PM_{2.5}$ regional emissions in the MCAB. As described in Section 3.3.1, *Description of the Project*, physical site improvements would occur at three ACUSD campuses to accommodate the consolidation of eight schools onto six current ACUSD campuses. Each of the three school campuses would have its own construction timeline for site improvements, and some activities may occur at the same time within the 9- to 12-month construction schedules. Impacts resulting from construction and operation of the three campuses with site improvements are discussed separately below.

Construction Fugitive Dust

Ground-disturbing activities during construction across the three ACUSD campuses 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 to AAD's Rule 218, *Fugitive Dust Emissions*, that would reduce impacts related to fugitive dust generated during project construction (Amador County 2023).

Furthermore, the SMAQMD's current CEQA guidance recommends that the SMAQMD's Basic Construction Emission Control Practices (BCECPs) be included as part of a project's Mitigation Monitoring and Reporting Program for the project to be measured against SMAQMD's non-zero PM significance threshold (SMAQMD 2019). Should a project not implement these BCECPs, the SMAQMD significance threshold for construction-generated PM would be zero. As construction of the proposed project would require activities which inherently generate fugitive dust emissions (e.g., demolition, site preparation, grading), the proposed project potential impacts related to construction fugitive dust are **potentially significant**.

Construction Exhaust Emissions

A quantified analysis of the proposed project's construction emissions for the maximum buildout scenario (Argonaut HS Site Improvements) was conducted using the CalEEMod Version 2022.1 based on information provided by the ACUSD and default equipment mix for each construction phase.

For this cumulative analysis, the maximum daily emissions based on the maximum development scenario (Argonaut HS Site Improvements) were multiplied by three to generate a worst-case scenario for construction emissions generated by the three school site improvements. This method assumes the maximum daily emissions generated at each site would occur concurrently and all three site improvements would involve the same duration of construction activities and intensity of equipment use. This worst-case scenario is used for a conservative analysis, and actual project build-out would be less than the conservative analysis.

As shown in Table 5.2-6, *Total Maximum Daily Unmitigated Regional Construction Emissions*, site improvements at three ACUSD campuses occurring concurrently would generate NO_X emissions above the SMAQMD significance thresholds.

Table 5.2-6 Total Maximum Daily Unmitigated Regional Construction Emissions

	Max Daily Criteria Air Pollutants (lbs/day)[1, 2]			
Max Daily Emissions (Unmitigated)	**ROG**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Argonaut HS Site Improvements	59	43	6.74	2.83
Number of School Site Improvements	3	3	3	3
Max Daily Construction Emissions[3]	**177**	**128**	**20.22**	**8.49**
SMAQMD Max Daily Project-Level Thresholds	**NA**	**85**	**80**	**82**
Exceeds Max Daily Threshold?	--	**Yes**	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 AAD under Rule 218, 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] Argonaut HS construction emissions were quantified as a worst-case scenario and conservatively multiplied by 3 to account for potential emissions generated at all three campuses being improved.

As shown in Table 5.2-6, short-term air quality impacts from overall project-related construction activities would exceed SMAQMD's threshold criteria for NO_X, therefore violating local air quality standards, and impacts would be **potentially significant**.

Long-Term Operation-Related Impacts

The proposed project involves site improvements at three ACUSD campuses to consolidate eight schools onto six current ACUSD campuses, which would generate typical long-term air pollutant emissions by area sources (e.g., landscape fuel use, aerosols, and architectural coatings), mobile sources from vehicle trips, and energy use (natural gas).

SMAQMD has adopted operational screening criteria to determine whether the type and size of a project's net new development would present a potential to exceed SMAQMD's operational significance thresholds (SMAQMD 2018). As the proposed project would provide physical site improvements at one ACUSD HS, one ACUSD junior HS, and one ACUSD ES campus, the appropriate SMAQMD screening criteria would be the following (SMAQMD 2018):

High School

- Ozone Precursor Screening Level: 370,000 square feet, or 2,780 students
- PM Screening Level: 735,000 square feet, or 5,525 students

Elementary School

- Ozone Precursor Screening Level: 365,000 square feet, or 5,350 students
- PM Screening Level: 760,000 square feet, or 9,100 students

As further discussed under Section 3.3.1, *Description of the Project*, Argonaut HS enrollment capacity would generate a net increase of 789 students and include a net increase in 28,608 building square footage. Enrollment capacity at Ione Junior HS would include a net increase of 408 students and require a net increase of 2,656 building square footage. The combined student enrollment and building square footage across Argonaut HS and Ione Junior HS after buildout would be below SMAQMD's High School land use criteria.[3]

The conversion of Jackson Junior HS into the County Preschool Center would generate a net decrease in enrollment capacity by 151 students. Enrollment capacity at Sutter Creek ES would include a net increase of 421 students and require a net increase of 16,400 building square footage. The combined student enrollment and building square footage across the new County Preschool Center and Sutter Creek ES at buildout would be below SMAQMD's Elementary School land use criteria.[4]

[3] SMAQMD operational screening levels do not include junior high school land use, consequently the high school land use criteria were applied for the Ione Junior HS student enrollment and site improvements.

[4] SMAQMD operational screening levels do not include preschool land use, consequently the elementary school land use criteria were applied for the conversion of Jackson Junior HS into County Preschool Center.

Overall, buildout of the proposed project would not exceed the appropriate SMAQMD screening criteria and long-term air pollutant emission would be **less than significant**. Therefore, operation-related impacts to the regional air quality associated with operation of the proposed project would be **less than significant**.

Argonaut High School Site Improvements

Construction Fugitive Dust

The construction of the new two-story classroom building, relocation of five portable classrooms, conversion of school buildings, and renovation of the gymnasium locker rooms at Argonaut HS would require activities which inherently generate fugitive dust emissions (e.g., demolition, site preparation, grading). Therefore, the site improvements at Argonaut HS would generate **potentially significant** impacts related to construction fugitive dust.

Construction Exhaust Emissions

As mentioned previously, a quantified analysis of the proposed project's construction emissions for the maximum buildout scenario (Argonaut HS Site Improvements) was conducted using the CalEEMod Version 2022.1 based on information provided by the District and default equipment mix for each construction phase. The proposed project would include 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 beginning from winter 2024 to winter 2025.

As shown in Table 5.2-6, criteria air pollutant emissions from construction equipment exhaust associated with a singular school campus would not exceed the SMAQMD maximum daily thresholds. Therefore, impacts from project-related construction activities at Argonaut HS to the regional air quality would be **less than significant**.

Long-Term Operation-Related Impacts

Specifically, site improvements at Argonaut HS campus would include 28,608 building square footage, 26,000 square feet of new hardscape, and an increase in student enrollment capacity of 789 students. As mentioned previously, under *Long-Term Operation-Related Impacts*, the site improvements at Argonaut HS combined with Ione Junior HS would be below SMAQMD's adopted operational screening criteria and would not generate a significant amount of operational criteria air pollutants nor ozone precursor emissions. Therefore, the improvements at Argonaut HS would also be below the SMAQMD's adopted operational screening criteria and impacts to the regional air quality associated with operation of the Argonaut HS would be **less than significant**.

Ione Junior High School Site Improvements

Construction Fugitive Dust

The construction of the two new classroom buildings, conversion of science labs to kindergarten classrooms, and conversion of restrooms to kindergarten restrooms at Ione Junior HS would require activities which

inherently generate fugitive dust emissions (e.g., demolition, site preparation, grading). Therefore, the site improvements at Ione Junior HS would generate **potentially significant** impacts related to construction fugitive dust.

Construction Exhaust Emissions

As shown in Table 5.2-6, criteria air pollutant emissions from construction equipment exhaust associated with a singular school campus would not exceed the SMAQMD maximum daily thresholds. Therefore, impacts from project-related construction activities at Ione Junior HS related to the regional air quality would be **less than significant**.

Long-Term Operation-Related Impacts

Specifically, the Ione Junior HS campus would include 2,656 building square footage, a new play structure and drop-off/pick-up areas, and an increased student capacity of 408 students. As previously mentioned, under *Long-Term Operation-Related Impacts*, the site improvements at Argonaut HS combined with Ione Junior HS would be below SMAQMD's adopted operational screening criteria and would not generate a significant amount of operational criteria air pollutants nor ozone precursor emissions. Therefore, the improvements at Ione Junior HS would also be below the SMAQMD's adopted operational screening criteria. Therefore, impacts to the regional air quality associated with operation of the proposed Ione Junior HS would be **less than significant**.

Sutter Creek Elementary School Site Improvements

Construction Fugitive Dust

The construction of a new 2-story classroom building, covered lunch shelter, and outdoor covered walkways at Sutter Creek ES would require activities which inherently generate fugitive dust emissions (e.g., demolition, site preparation, grading). Therefore, the site improvements at Sutter Creek ES would generate **potentially significant** impacts related to construction fugitive dust.

Construction Exhaust Emissions

As shown in Table 5.2-6, criteria air pollutant emissions from construction equipment exhaust associated with a singular school campus would not exceed the SMAQMD maximum daily thresholds. Therefore, impacts from project-related construction activities at Sutter Creek ES to the regional air quality would be **less than significant**.

Long-Term Operation-Related Impacts

Specifically, Sutter Creek ES campus would include 16,400 square foot building, lunch shelter, and an increased in student enrollment capacity of 421 students. As mentioned previously, under *Long-Term Operation-Related Impacts*, the site improvements associated with the conversion of Jackson Junior HS into the County Preschool Center combined with Sutter Creek ES would be below SMAQMD's adopted operational screening criteria and would not generate a significant amount of operational criteria air pollutants nor ozone precursor emissions. Therefore, the improvements at Sutter Creek ES would also be below the SMAQMD's adopted operational

screening criteria. Impacts to the regional air quality associated with operation of the proposed Sutter Creek Elementary would be **less than significant**.

Level of Significance Before Mitigation: Potentially significant impact.

Impact 5.2-3: The proposed project could expose sensitive receptors to substantial pollutant concentrations. [Threshold AQ-3]

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.

School Closure/Consolidation Program Project

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 County's RTP is to concentrate development in areas within existing urban areas and promote interregional transit services to improve air quality and minimize the need for costly infrastructure investments (ACTC 2020). Additionally, the proposed project would continue to serve the student population ACUSD and each of the ACUSD campuses within the school closure/consolidation program are in close proximity to existing roadways, transit, and bicycle and pedestrian routes. Thus, the proposed project would be consistent with the overall goals of the County's RTP.

SMAQMD has developed two-tiered qualitative screening criteria to determine whether a proposed project would have the potential to exceed the AAQS for CO to result in a CO hotspot. As mentioned in the traffic operations memorandum (contained in Appendix K), the proposed project would generate traffic that would result in deterioration of two existing intersection LOS to LOS E (Sutter Street/Hoffman Street) and F (Argonaut Lane/State Route 88) and would not meet Tier 1 screening criteria.

However, the proposed project would meet Tier 2 screening criteria as follows:

- The proposed project would not result in an affected intersection experiencing more than 31,600 vehicles per hour.

  The proposed project would result in a maximum of 1,032 AM peak-hour trips and 625 PM peak-hour trips (Kittelson & Associates 2023a). Therefore the proposed project would not result in more than 31,600 vehicles per hour at nearby intersections.

- The project would not contribute traffic to a tunnel, parking garage, bridge underpass, urban street canyon, below-grade roadway, or other locations where horizontal or vertical mixing of air would be substantially limited.

  There are no major tunnels, parking garages, bridge underpasses, urban street canyons, below-grade roadways near the vicinity of each of the ACUSD campuses within the school closure/consolidation program. Therefore, the proposed project would not contribute significant traffic to these features or other locations where horizontal or vertical mixing of air would be substantially limited.

- The mix of vehicle types at the intersection is not anticipated to be substantially different from the County average.

  The proposed project would mainly generate passenger vehicle trips (students and staff) and ACUSD would continue to provide a busing program. Therefore, the mix of vehicle types associated with the proposed project would be similar to existing conditions and would not be substantially different from the County average.

Since the proposed project meets Tier 2 screening criteria, overall, the proposed project would not have the potential to substantially increase CO hotspots at intersections in the MCAB. Moreover, the potential for CO hotspots to be generated in the MCAB 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.

Health Risk

Construction Community Risk and Hazards

As mentioned below, the SMAQMD does not require a health risk assessment to be conducted for short-term emissions from construction equipment and has not established a quantitative threshold of significance for construction-related TAC emissions (SMAQMD 2020c). The site improvements at the three ACUSD campuses would each be developed in approximately 9- to 12-months, which would limit the exposure to on-site and off-site receptors. Both the SMAQMD and the District currently do not require the evaluation of long-term excess cancer risk or chronic health impacts for a short-term project.

As shown in Table 5.2-6, maximum construction emissions from the proposed project would exceed the SMAQMD's maximum daily significance thresholds. Thus, overall construction emissions could pose a threat to on-site and off-site receptors at or near each of the ACUSD campuses, and cumulative-related construction health impacts would be **potentially significant**.

Health Effects of Exceeding the Criteria Air Pollutant Thresholds

Contributing to the nonattainment status would also contribute to elevating health effects associated with 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.

Estimated health effects related to $PM_{2.5}$, ROG, and NO_X emissions within the MCAB due to the proposed project would result in a very small increase over the background incidence of premature deaths. Therefore, the overall emissions would have lower estimated health effects and would have a **less-than-significant** 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 would require physical site improvements at three ACUSD campuses to accommodate the consolidation of eight schools onto six current ACUSD campuses. Overall operational emissions would be equal to or less than existing emissions due to the decrease in building space and student enrollment associated with the closure of Ione ES and Sutter Creek Primary School. The proposed project would continue to allow a wide range of travel modes and the operation of a busing program; therefore, the proposed project would not hinder the County's goal to improve and maintain air quality.

In addition, the ACUSD campuses within the school closure/consolidation program are within a residential community and not within a quarter mile of any permitted or non-permitted facilities (e.g., warehousing). Furthermore, there are no freeways or busy corridors within a quarter mile of each of the ACUSD campuses included in the proposed project.[5] Therefore, the transfer of students and staff to Argonaut HS, Amador HS, Ione Junior HS, County Preschool Center, Jackson ES, and Sutter Creek ES campuses would not be exposed to an actual or potential endangerment from surrounding emissions sources and carcinogenic/non-carcinogenic impacts would be **less than significant**.

[5] 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.

Argonaut High School Site Improvements

CO Hotspots

After Argonaut HS site improvements, intersections at Argonaut Lane/SR 88, Argonaut Lane/Stony Creek Road/Hoffman Street, and Sutter Street/Hoffman Street would operate at LOS E or worse, which represents operational deficiencies (Kittelson & Associates 2023b). As described under *School Closure/Consolidation Program Project*, the proposed project would meet Tier 2 screening criteria and would not have the potential to substantially increase CO hotspots at intersections in the MCAB. Moreover, site improvements at Argonaut HS would occur within the existing campus boundaries and would not increase exposure of CO emissions to on-site students and staff or off-site receptors more than existing conditions. Therefore, localized air quality impacts related to mobile-source emissions would be **less than significant**.

Health Risk

Construction Community Risk and Hazards

The site improvements at Argonaut HS would be developed in approximately 12 months, which would limit the exposure to on-site and off-site receptors. Sensitive receptors to the Argonaut HS campus include the single-family residences to the north along Westview Drive and the on-site students and staff. As shown in Table 5.2-6, construction emissions associated with a single campus would not exceed the SMAQMD's maximum daily significance thresholds. Thus, construction emissions would not pose a threat to on-site and off-site receptors at or near the Argonaut HS campus, and construction health impacts related to Argonaut HS site improvements would be **less than significant**.

Operation Phase Community Risk and Hazards

Although building square footage and student enrollment would increase after site improvements at Argonaut HS, as mentioned under *Operational Phase Community Risk and Hazards*, overall operational emissions would be equal to or less than existing emissions due to the decrease in building space and student enrollment associated with the closure of Ione ES and Sutter Creek Primary School. Therefore, operational emissions for the site improvements at Argonaut HS were not warranted.

The site improvements at Argonaut HS would occur on campus and not interfere with the City's ability to improve bicycle and pedestrian networks. Thus, site improvements at Argonaut HS would not hinder the City's goal to improve and maintain air quality (Kittelson & Associates 2023c). The Argonaut HS campus is located within a residential community and is not within a quarter mile of any permitted/non-permitted facilities (e.g., warehousing) or freeway/busy corridors.[6] Therefore, on-site students and staff would not 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.

[6] 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.

Ione Junior High School Site Improvements

CO Hotspots

After Ione Junior HS site improvements, intersections at Mills Street/Marlette Street, Sacramento Street/Marlette Street, SR 124/Relihan Drive, and Church Street/Market Street would operate at LOS C or better, which represents traffic volumes at less than roadway capacity. In addition, as described under *School Closure/Consolidation Program Project*, the proposed project would meet Tier 2 screening criteria and would not have the potential to substantially increase CO hotspots at intersections in the MCAB. Moreover, site improvements at Ione Junior HS would occur within the existing campus boundaries and would not increase exposure of CO emissions to on-site students and staff more than existing conditions. Therefore, localized air quality impacts related to mobile-source emissions would be **less than significant**.

Health Risk

Construction Community Risk and Hazards

The site improvements at Ione Junior HS would be developed in approximately 9 months, which would limit the exposure to on-site and off-site receptors. Sensitive receptors to the Ione Junior HS campus include the single-family residences to the north along S. Mills Street, the Catholic Cemetery to the east, and the on-site students and staff. As shown in Table 5.2-6, construction emissions associated with a single campus would not exceed the SMAQMD's maximum daily significance thresholds. Thus, construction emissions would not pose a threat to on-site and off-site receptors at or near the Ione Junior HS campus, and construction health impacts related to Ione Junior HS site improvements would be **less than significant**.

Operation Phase Community Risk and Hazards

Although building square footage and student enrollment would increase after site improvements at Ione Junior HS, as mentioned under *Operational Phase Community Risk and Hazards*, overall operational emissions would be equal to or less than existing emissions due to the decrease in building space and student enrollment associated with the closure of Ione ES and Sutter Creek Primary School. Therefore, operational emissions for the site improvements at Ione Junior HS were not warranted.

Additionally, the site improvements at Ione Junior HS would not interfere with the established bicycle networks and would provide onsite improvements to improve internal circulation. Thus, site improvements at Ione Junior HS would not hinder the City's goals and policies related to transportation and circulation (Kittelson & Associates 2023c). The Ione Junior HS campus is located within a residential community and is not within a quarter mile of any permitted/non-permitted facilities (e.g., warehousing) or freeway/busy corridors.[7] Therefore, on-site students and staff would not 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.

[7] 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.

Sutter Creek Elementary School Site Improvements

CO Hotspots

As described under *School Closure/Consolidation Program Project*, the proposed project would meet Tier 2 screening criteria and would not have the potential to substantially increase CO hotspots at intersections in the MCAB. Moreover, site improvements at Sutter Creek ES would occur within the existing campus boundaries and would not increase exposure of CO emissions to on-site students and staff more than existing conditions. Therefore, localized air quality impacts related to mobile-source emissions would be **less than significant**.

Health Risk

Construction Community Risk and Hazards

The site improvements at Sutter Creek ES would be developed in approximately 12 months, which would limit the exposure to on-site and off-site receptors. Sensitive receptors to the Sutter Creek ES campus include the single-family residences to the north along Sutter lone Road, to the east along Spanish Street, and to the west along Oro Madre Way, and Amador HS directly to the south, and the on-site students and staff. As shown in Table 5.2-6, construction emissions associated with a single campus would not exceed the SMAQMD's maximum daily significance thresholds. Thus, construction emissions would not pose a threat to on-site and off-site receptors at or near the Sutter Creek ES campus, and construction health impacts related to Sutter Creek ES site improvements would be **less than significant**.

Operation Phase Community Risk and Hazards

Although building square footage and student enrollment would increase after site improvements at Sutter Creek ES, as mentioned under *Operational Phase Community Risk and Hazards*, overall operational emissions would be equal to or less than existing emissions due to the decrease in building space and student enrollment associated with the closure of Ione ES and Sutter Creek Primary School. Therefore, operational emissions for the site improvements at Sutter Creek ES were not warranted.

Additionally, the site improvements at Sutter Creek ES would not conflict with planned programs nor the Sutter Creek's General Plan policies governing the local circulation system (Kittelson & Associates 2023c). The Sutter Creek ES campus is located within a residential community and is not within a quarter mile of any permitted/non-permitted facilities (e.g., warehousing) or freeway/busy corridors.[8] Therefore, on-site students and staff would not 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.

Level of Significance Before Mitigation: Less-than-significant impact.

[8] 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.

Impact 5.2-4: The proposed project would not result in other emissions that would adversely affect a substantial number of people. [Threshold AQ-4]

School Closure/Consolidation Program Project

The consolidated six current ACUSD campuses would continue to operate as schools and would not be a type of land use to create 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, overall, any construction-related odor emissions would be low in concentration and temporary.

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.

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, each project site would be required to comply with AAD Rule 205, *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 site improvements at the three ACUSD campuses are not considered the type of use that would generate odors that would affect a substantial number of people.

Argonaut High School Site Improvements

The site improvements at Argonaut HS would continue to operate as a HS and would not result in a change in land use that would generate long-term objectionable odors. By the time construction-related odors would reach the off-site sensitive receptors, single-family residences to the north along Westview Drive, odors would be diluted to well below any level of air quality concern. In summary, the site improvements at Argonaut HS would not generate short-term or long-term odors that would affect a substantial number of people. Odor impacts would be **less than significant**.

Ione Junior High School Site Improvements

The site improvements at Ione Junior HS would continue to operate as a junior HS and would not result in a change in land use that would generate long-term objectionable odors. By the time construction-related odors would reach the off-site sensitive receptors, single-family residences to the north along S. Mills Street and the Catholic Cemetery to the east, odors would be diluted to well below any level of air quality concern. In summary, the site improvements at Ione Junior HS would not generate short-term or long-term odors that would affect a substantial number of people. Odor impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

The site improvements at Sutter Creek ES would continue to operate as an elementary school and would not result in a change in land use that would generate long-term objectionable odors. By the time construction-related odors would reach the off-site sensitive receptors, single-family residences to the north along Sutter lone Road, to the east along Spanish Street, and to the west along Oro Madre Way, and Amador HS directly to the south, odors would be diluted to well below any level of air quality concern. In summary, the site improvements at Sutter Creek ES would not generate short-term or long-term odors that would affect a substantial number of people. Odor impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than Significant.

5.2.4 Mitigation Measures

Impact 5.2-2

The following mitigation measures are prescribed to reduce impacts associated with Impact 5.2-2.

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, and 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 five 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.

AQ-2 The soil haul duration associated with site preparation activity shall be no less than two days and the project shall require the construction contractor to use equipment that meets the United States Environmental Protection Agency (USEPA) Tier 4-interim emissions standards for off-road diesel-powered construction equipment with more than 100 horsepower, unless it can be demonstrated to the District that such equipment is not available. Any emissions-control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 4 diesel emissions control strategy for a similarly sized engine, as defined by the California Air Resources Board's (CARB's) regulations.

Prior to construction, the project engineer shall ensure that all demolition and grading plans clearly show the requirement for USEPA Tier 4-interim or higher emissions standards for construction equipment over 100 horsepower. During construction, the construction contractor shall maintain a list of all operating equipment in use on the construction site for verification by the District. The construction equipment list shall state the makes, models, and numbers of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. Construction contractors shall also ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with CARB's Rule 2449.

5.2.5 Level of Significance After Mitigation

Impact 5.2-2

With implementation of Mitigation Measure AQ-1, the proposed project would implement applicable dust control BCECPs to reduce the generation of fugitive dust during project construction. By implementing these BCECPs, the proposed project is considered to have a less-than-significant impact related to construction-generated $PM_{2.5}$ and PM_{10}, as discussed previously and illustrated in Table 5.2-6.

With implementation of Mitigation Measure AQ-2, the proposed project would implement a soil haul duration of no less than two days for site preparation activity and enforce USEPA Tier 4-interim equipment for equipment above 100 horsepower to reduce NO_X emission. As illustrated in Table 5.2-7, *Total Maximum Daily Mitigated Regional Construction Emissions*, NO_X emissions that would occur concurrently would be below SMAQMD's significance threshold and impacts would be less than significant related to cumulative NO_X construction emissions.

Table 5.2-7 Total Maximum Daily Mitigated Regional Construction Emissions

	Max Daily Criteria Air Pollutants (lbs/day)[1, 2]			
Max Daily Emissions (Mitigated)	**ROG**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Argonaut HS Site Improvements	59	21	4.67	1.83
Number of School Site Improvements	3	3	3	3
Max Daily Construction Emissions[3]	**176**	**64**	**14.01**	**5.49**
SMAQMD Maximum Daily Project-Level Thresholds	**NA**	**85**	**80**	**82**
Exceeds Max Daily Threshold?	--	**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 AAD under Rule 218, 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. Includes Mitigation Measure AQ-2, which requires a soil haul duration for site preparation activity no less than 2 days and the use of Tier 4-interim construction equipment for equipment 100 horsepower and higher.
[3] Argonaut HS construction emissions were quantified as a worst case scenario and conservatively multiplied by 3 to account for potential emissions generated at all three campuses being improved.

5.2.6 Cumulative Impacts

Cumulative projects in the local area include new development and general growth in the project area. According to SMAQMD's methodology, any project that produces a significant project-level regional air quality impact in an area that is nonattainment would contribute to the cumulative impact (SMAQMD 2020d). Consistent with the methodology, projects that do not exceed SMAQMD's significance thresholds would not result in significant cumulative impacts. In addition, projects that do not exceed the cancer risk or chronic hazard thresholds based on the latest guidance from OEHHA (2015) would not result in significant cumulative impacts.

Criteria Air Pollutants

Construction

The MCAB is designated nonattainment for O_3 under the California and National AAQS. Construction of cumulative projects will further degrade the regional and local air quality, as air quality will be temporarily impacted during construction activities. However, as shown in Table 5.2-7, project-related construction activities would not generate short-term emissions that would exceed SMAQMD's maximum daily thresholds with incorporation of Mitigation Measure AQ-1 and AQ-2. Per SMAQMD methodology, the construction-related air pollutant emissions associated with the proposed project would not be cumulatively considerable and impacts are **less than significant.**

Operation

For operational air quality emissions, any project that does not exceed (or can be mitigated to less than) SMAQMD's maximum daily threshold values would not be considered by SMAQMD to make a cumulatively considerable contribution to a cumulative air quality impact. As discussed under Impact 5.2-2, overall buildout

of the proposed project would not exceed the appropriate SMAQMD operational screening criteria and long-term air pollutant emission would be less than significant. Therefore, the air pollutant emissions associated with the proposed project would not be cumulatively considerable and impacts are **less than significant**.

Toxic Air Contaminants and $PM_{2.5}$

The ACUSD campuses within the school closure/consolidation program would not change location and thus the proposed project would not place receptors closer to any existing TAC generators. Site improvements would occur over a span of 9- to 12-months, which would limit the exposure to on-site and off-site receptors. Additionally, the land uses at each of the ACUSD campuses would not be changing, and operation of school uses does not use substantial quantities of TACs nor exacerbate existing hazards. As shown in Table 5.2-7, construction emissions would not exceed SMAQMD's maximum daily significance threshold; consequently, cumulative localized impacts from TACs and $PM_{2.5}$ would be **less than significant**.

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5.3 BIOLOGICAL RESOURCES

The analysis in this section is based in part on the following technical report(s):

- *Biological Resources Assessment for the Amador Unified School District Project*, ECORP Consulting, Inc., November 22, 2023

A complete copy of this study is included in the technical appendices to this Draft EIR (Appendix E).

5.3.1 Environmental Setting

5.3.1.1 REGULATORY BACKGROUND

Federal

Endangered Species Act (ESA)

The federal ESA protects plants and animals that are listed as endangered or threatened by the USFWS or the National Marine Fisheries Service (NMFS). Section 9 of the ESA prohibits the taking of listed wildlife, where take is defined as "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in such conduct" (50 Code of Federal Regulations [CFR] 17.3). For plants, the ESA prohibits removing or possessing any listed plant on federal land, maliciously damaging or destroying any listed plant in any area, or removing, cutting, digging up, damaging, or destroying any such species in knowing violation of state law (16 U.S. Code [USC] 1538). Under Section 7 of ESA, federal agencies are required to consult with the USFWS if their actions, including permit approvals or funding, could adversely affect a listed (or proposed) species (including plants) or its designated Critical Habitat. Through consultation and the issuance of a Biological Opinion, the USFWS may issue an incidental take statement allowing take of a listed species that is incidental to an otherwise authorized activity provided the activity will not jeopardize the continued existence of the species. Section 10 of the ESA provides for issuance of incidental take permits where no other federal actions are necessary provided a Habitat Conservation Plan (HCP) is developed.

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) implements international treaties between the U.S. and other nations devised to protect migratory birds, any of their parts, eggs, and nests from activities such as hunting, pursuing, capturing, killing, selling, and shipping, unless expressly authorized in the regulations or by permit. The protections of the MBTA extend to disturbances that result in abandonment of a nest with eggs or young. As authorized by the MBTA, the USFWS may issue permits to qualified applicants for the following types of activities: falconry, raptor propagation, scientific collecting, special purposes (rehabilitation, education, migratory game bird propagation, and salvage), take of depredating birds, taxidermy, and waterfowl sale and disposal. The regulations governing migratory bird permits can be found in 50 CFR part 13 General Permit Procedures and 50 CFR part 21 Migratory Bird Permits. The State of California has incorporated the protection of migratory birds in Section 3513 of the California Fish and Game Code.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act of 1940 (as amended) provides for the protection of bald eagle and golden eagle by prohibiting the take, possession, sale, purchase, barter, offer to sell, purchase or barter, transport, export or import, of any bald or golden eagle, alive or dead, including any part, nest, or egg, unless allowed by permit [16 USC 668(a); 50 CFR 22]. The USFWS may authorize take of bald eagles and golden eagles for activities where the take is associated with, but not the purpose of, the activity and cannot practicably be avoided (50 CFR 22.26).

Clean Water Act, Section 404

The United States Army Corps of Engineers (USACE) regulates discharge of dredged or fill material into "waters of the United States."[1] Any filling or dredging within waters of the United States requires a permit, which entails assessment of potential adverse impacts to USACE wetlands and jurisdictional waters and any mitigation measures that the USACE requires. Section 7 consultation with USFWS may be required for impacts to a federally listed species. If cultural resources may be present, Section 106 review may also be required. When a Section 404 permit is required, a Section 401 Water Quality Certification is also required from the Regional Water Quality Control Board (RWQCB).

Clean Water Act, Section 401and 402

Section 401(a)(1) of the CWA specifies that any applicant for a federal license or permit to conduct any activity that may result in any discharge into navigable waters shall provide the federal permitting agency with a certification, issued by the state in which the discharge originates, that any such discharge will comply with the applicable provisions of the CWA. In California, the applicable RWQCB must certify that the project will comply with water quality standards. Permits requiring Section 401 certification include USACE Section 404 permits and National Pollutant Discharge Elimination System (NPDES) permits issued by the Environmental Protection Agency (EPA) under Section 402 of the CWA. NPDES permits are issued by the applicable RWQCB.

State

California Endangered Species Act

The California ESA (California Fish and Game Code §§ 2050-2116) generally parallels the main provisions of the federal ESA, but unlike its federal counterpart, the California ESA applies the take prohibitions to species proposed for listing (called candidates by the state). Section 2080 of the California Fish and Game Code prohibits the taking, possession, purchase, sale, and import or export of endangered, threatened, or candidate

[1] "Waters of the United States," as applied to the jurisdictional limits of the Corps under the Clean Water Act, includes all waters that are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters that are subject to the tide; all interstate waters, including interstate wetlands; and all other waters, such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, wetlands, sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds whose use, degradation, or destruction could affect interstate or foreign commerce; water impoundments; tributaries of waters; territorial seas; and wetlands adjacent to waters. The terminology used by Section 404 of the Clean Water Act includes "navigable waters," which is defined at Section 502(7) of the act as "waters of the United States, including the territorial seas."

species, unless otherwise authorized by permit or in the regulations. Take is defined in Section 86 of the California Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Section 2081 allows CDFW to authorize incidental take permits if species specific minimization and avoidance measures are incorporated to fully mitigate the impacts of the project.

The state of California first began to designate species as fully protected prior to the creation of the federal and California ESAs. Lists of fully protected species were initially developed to provide protection to those animals that were rare or faced possible extinction and included fish, amphibians and reptiles, birds, and mammals. Most fully protected species have since been listed as threatened or endangered under the state and/or federal ESAs. The regulations that implement the Fully Protected Species Statute (California Fish and Game Code § 4700 for mammals, § 3511 for birds, § 5050 for reptiles and amphibians, and § 5515 for fish) provide that fully protected species may not be taken or possessed at any time. CDFW prohibits any state agency from issuing incidental take permits for fully protected species. CDFW may issue licenses or permits for take of these species for necessary scientific research or live capture and relocation, and may allow incidental take for lawful activities carried out under an approved Natural Community Conservation Plan within which such species are covered.

Native Plant Protection Act

The Native Plant Protection Act (NPPA) of 1977 was created with the intent to "preserve, protect and enhance rare and endangered plants in this State." The NPPA is administered by CDFW and provided in California Fish and Game Code §§ 1900-1913. The Fish and Wildlife Commission has the authority to designate native plants as endangered or rare and to protect endangered and rare plants from take. The California ESA of 1984 (California Fish and Game Code §§ 2050-2116) provided further protection for rare and endangered plant species, but the NPPA remains part of the California Fish and Game Code.

California Fish and Game Code Special Protection for Birds

Sections 3503, 3513, and 3800 of the California Fish and Game Code specifically protect birds. Section 3503 prohibits the take, possession, or needless destruction of the nest or eggs of any bird. Subsection 3503.5 prohibits the take, possession, or destruction of any birds in the orders Strigiformes (owls) or Falconiformes (hawks and eagles), as well as their nests and eggs. Section 3513 prohibits the take or possession of any migratory nongame bird as designated in the MBTA. Section 3800 states that, with limited exceptions, it is unlawful to take any nongame bird, defined as all birds occurring naturally in California that are not resident game birds, migratory game birds, or fully protected birds. These provisions, along with the federal MBTA, serve to protect all nongame birds and their nests and eggs, except as otherwise provided in the code.

California Fish and Game Code Section 1602: Lake or Streambed Alternation Agreements

Section 1602 of the California Fish and Game Code requires that a Notification of Lake or Streambed Alteration be submitted to CDFW for "any activity that may substantially divert or obstruct the natural flow or substantially change the bed, channel, or bank of any river, stream, or lake." The notification must incorporate proposed measures to protect affected fish and wildlife resources. During their review, CDFW may suggest additional protective measures. A Lake or Streambed Alteration Agreement (LSAA) is the final proposal

mutually agreed upon by CDFW and the applicant. Projects that require an LSAA often also require a permit from the U.S. Army Corps of Engineers (USACE) under Section 404 of the CWA. The conditions of the Section 404 permit and the LSAA frequently overlap in these instances.

California Oak Woodlands Conservation Act

The California Oak Woodlands Conservation Act was passed in 2001 to address loss of oak woodland habitats throughout the state. As a result of the Act, the Oak Woodland Conservation Program was established to provide funding for conservation and protection of California oak woodlands. Public Resources Code Section 21083.4 went into effect as of January 1, 2005, and requires lead agencies to analyze potential effects to oak woodlands during the CEQA process. If it is determined that a project may have a significant effect on oak woodlands, the lead agency must implement one of several mitigation alternatives, including conservation of oak woodlands through conservation easements, planting or restoration of oak woodlands, contribution of funds to the Oak Woodlands Conservation Fund, or other appropriate mitigation measures.

Porter-Cologne Water Quality Act

The Regional Water Quality Control Board (RWQCB) implements water quality regulations under the federal Clean Water Act (CWA) and the Porter-Cologne Water Quality Act. These regulations require compliance with the National Pollutant Discharge Elimination System (NPDES), including compliance with the California Storm Water NPDES General Construction Permit for discharges of storm water runoff associated with construction activities. General Construction Permits for projects that disturb one or more acres of land require development and implementation of a Storm Water Pollution Prevention Plan. Under the Porter-Cologne Water Quality Act, the RWQCB also regulates actions that would involve "discharging waste, or proposing to discharge waste, within any region that could affect the water of the state" (Water Code 13260(a)). Waters of the State are defined as "any surface water or groundwater, including saline waters, within the boundaries of the state" (Water Code 13050 (e)). The RWQCB regulates all such activities, as well as dredging, filling, or discharging materials into Waters of the State, that are not regulated by the USACE due to a lack of connectivity with a navigable water body. The RWQCB may require issuance of a Waste Discharge Requirements for these activities.

Local

Jackson General Plan

The OpenSpace and Conservation Element of the Jackson General Plan does not contain any policies or actions regarding biological resources (Jackson 1987). The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals, objectives, policies, and actions related to biological resources are outlined here (Jackson 2023).

- **Goal COS-3:** Conserve, protect, and enhance plant and animal life, including natural ecosystems, animal habitats, trees, and native vegetation.

- **Policy COS-3.1:** Preserve and enhance biological communities that contribute to the City's and the region's biodiversity including, but not limited to, grasslands, wetlands, vernal pools, riparian areas, aquatic habitat, oak woodlands, and agricultural lands.
- **Policy COS-3.2:** Focus conservation efforts on high priority conservation areas that contain suitable habitat for endangered, threatened, migratory, or special-status species and that can be managed with minimal interference with nearby urban land uses.
- **Policy COS-3.3:** Preserve existing native trees and vegetation where possible and integrate regionally native trees and plant species into development and infrastructure projects where appropriate.
- **Policy COS-3.4:** Utilize locally-sourced native and drought-tolerant plants and trees for landscaping on public projects consistent with the City's landscape standards. Strongly encourage the use of native drought-tolerant trees for landscaping on private projects.
- **Policy COS-3.5:** Avoid removal of large, mature trees that provide wildlife habitat, visual screening, or contribute to the visual quality of the environment through appropriate project design and building siting, if feasible. If full avoidance is not possible, prioritize planting of replacement trees on-site over off-site locations. Replacement trees for high-quality mature trees should generally be of like kind, and provide for comparable habitat functionality, where appropriate site conditions exist.
- **Policy COS-3.6:** Facilitate the preservation of existing trees, the planting of additional street trees, and the replanting of trees lost through disease, new construction, or by other means.
- **Policy COS-3.7:** Strongly discourage the removal of healthy trees on public and private property

Jackson Municipal Code

Section 17.40.120, Criteria for Tree Removal. The Jackson City, California Municipal code, Section 17.40.120 Criteria for Tree Removal, requires that all developments shall conserve trees. It requires that development proposals calling for the removal of trees with 8 inches or greater diameter at breast height (DBH) be approved by the Planning Commission. It also states that oak trees greater than 16 inches DBH shall be mitigated for by replacement with like species at a minimum ratio of three trees planted for every one tree removed.

Ione General Plan

- **Policy CO-1.1:** Protect rare, threatened, and endangered species and their habitats in accordance with State and federal law.
- **Policy CO-3.1:** Conserve existing native and non-invasive trees for their historic, economic, aesthetic, educational, and environmental value.
- **Policy CO-3.2:** The City shall require preservation of all trees of 36" dbh or greater on development sites, unless health, safety, or access requirements do not allow for preservation of such trees. All development is required to fully mitigate the removal of any trees by replanting.

Ione Municipal Code

Section 8.20, Protection of Tree Stock on Undeveloped Property and Heritage Trees and Street Trees on Developed Property. The Ione City, California Municipal code, Section 8.20 Protection of Tree Stock on Undeveloped Property and Heritage Trees and Street Trees on Developed Property, requires that permits be obtained from the City manager for the removal of any heritage tree. A heritage tree is defined as any tree that is over 16 inches DBH.

Sutter Creek General Plan

- **Policy COS-1.9.1:** Development projects shall be reviewed for their direct and indirect impacts on fish and wildlife resources. The California Department of Fish and Wildlife shall be notified pursuant to CEQA regarding development projects unless the Planning Commission or City Council make the de minimis findings pursuant to Section 21089 and 21092 et. seq. of the California Public Resources Code. Development project applicants shall be required to pay associated fees before approval of such development projects may be considered final.
- **Policy COS-1.9.6:** The Planning Commission and/or City Council shall not approve projects that threaten or destroy native oaks or other unique native flora unless said vegetation is replaced, protected, and maintained such that the quantity and value of the vegetation that is lost is certain to be replaced for future human generations.

Sutter Creek Municipal Code

Chapter 13.24.130, Tree landscaping plans for building permits, site plans, use permits and grading permits. No building permits, site plans, use permits or grading permits for any type of improvements will be issued unless a tree and landscaping plan has been approved by the planning commission.

5.3.1.2 EXISTING CONDITIONS

The Argonaut HS, Ione Junior HS, and Sutter Creek ES campuses have their own distinct Biological Study Areas (BSAs). The BSAs include all areas where project-related activities may result in impacts to biological resources. The three campuses are in the Northern Sierra Nevada Foothills Region of the California floristic province. The average winter low temperature is 40.4 degrees Fahrenheit (°F), and the average summer high temperature is 94.6°F; the average annual precipitation is approximately 22.86 inches at the Camp Pardee station, which is approximately 10 miles from the BSAs.

Argonaut High School

The 1.28-acre Argonaut HS BSA corresponds to a portion of the existing Argonaut HS campus. The area around the campus is considered highly disturbed and is within an urbanized area. The Argonaut BSA is situated at approximately 1,515 to 1,545 feet above mean sea level (MSL) and consists of rolling terrain oak woodlands with rock outcroppings between existing buildings, paved walkways, and parking lots with ruderal borders. The BSA in this location also includes a small orchard with various fruit and nut trees. Developed portions of the

Argonaut BSA are considered disturbed land, and the undeveloped portion of the Argonaut BSA includes blue woodlands. See Figure 5.3-1, *Argonaut High School: Biological Study Area with Vegetation Communities/Land Cover*.

Ione Junior High School

The 0.46-acre Ione Junior HS BSA corresponds to a portion of the existing Ione Junior HS campus. Due to the existing campus, the area is considered highly disturbed and is within an urbanized area. The Ione BSA is at approximately 290 to 315 feet above MSL and consists of a parking lot with mixed conifer trees on the border and a dirt storage lot with large storage boxes and sheds, bordered by some scattered native oak trees and nonnative trees. The Ione BSA contains only disturbed/developed land. See Figure 5.3-2, *Ione Junior High School: Biological Study Area with Vegetation Communities/Land Cover*.

Sutter Creek Elementary School

The 0.97-acre Sutter Creek ES BSA corresponds to a portion of the existing Sutter Creek ES campus. Due to the campus, the area is considered highly disturbed and is within an urbanized area. The Sutter Creek BSA is at approximately 1,285 to 1,295 feet above MSL and consists of a paved playground and part of a maintained sports field with a dirt border between these areas that contains ruderal weeds and sylvicultural trees. See Figure 5.3-3, *Sutter Creek School: Biological Study Area with Vegetation Communities/Land Cover*.

Vegetation Communities/Land Cover

As the BSAs are within developed school sites, all sections of the BSAs generally consist of the developed/disturbed land cover type. Smaller vegetation communities existing within these areas were classified based on the classification systems presented in the online Manual of California Vegetation (MCV) database. A full list of plants observed in the BSAs can be found in Appendix C of the BRA (attached as Appendix E to the DEIR). Two land cover/vegetation communities were observed within the BSAs during the site reconnaissance visit on June 23, 2023 - one vegetated (Blue Oak Woodland) and one unvegetated (disturbed/developed).

Blue Oak Woodland

The vegetation community of blue oak woodland can be found within the Argonaut BSA and the Ione BSA. The Argonaut BSA includes blue oak woodland (*Quercus douglasii*) and California buckeye (*Aesculus californica*). The Ione BSA includes a small grouping of native oak trees—including blue oak and interior live oak trees as well as nonnative species—in the proposed pre-kindergarten area (see Figure 3-4, *Ione Elementary School at Former Ione Junior High School Improvements*). The proposed pre-kindergarten area is considered disturbed/developed land because the oak trees exist between the pavement and storage containers. The blue oak woodland community can be characterized as the *Quercus douglasii* Forest & Woodland Alliance, as classified by the MCV. This alliance is not considered a sensitive natural community, and the blue oak woodland within the BSA does not resemble ant known sensitive associations.

Disturbed/Developed

The land areas classified as disturbed or developed are in all the BSAs, and are composed of paved areas with buildings, parking lots, and walkways, maintained lawns and planted trees, and patches or strips of natural vegetation on the edges of developed areas. The Ione BSA contains a small grouping of native oak trees, including blue oak and interior live-oak trees, as well as nonnative species bordering a storage lot. The remaining portions of the disturbed/developed areas were either devoid of vegetation or dominated by nonnative ruderal herbaceous species. Small patches of annual grassland vegetation occur between or adjacent to the developed sections within each of the BSAs. Species found within these small patches of annual grassland include brome fescue (*Festuca bromoides*), foxtail (*Hordeum murinum*), rose clover (*Trifolium hirtum*), and medusahead (*Elymus caput-meusae*), amon others. The annual grassland patches most resemble the *Avena* spp. – *Bromus* spp. Herbaceous Semi-natural Alliance but are not large enough to be mapped as a separate vegetation community. The *Avena* spp. – *Bromus* spp Herbaceous Semi-natural Alliance is not considered a sensitive natural community.

Habitat

There is no Critical Habitat within any of the BSAs and no Essential Fish Habitat occurs within the Amador City, Jackson, or Ione California 7.5-minute quadrangles.

Aquatic Resources

The biological resources assessment determined that there are no mapped aquatic features within the BSAs. The nearest National Wetland Inventory-mapped aquatic resource is a riverine feature north of Argonaut BSA which has been previously filled and realigned as a result of school and residential construction (see Figure 5.3-4, *Argonaut High School: NWI Mapped Aquatic Feature*).

A preliminary aquatic resources assessment to identify potential Waters of the U.S. and State was conducted within the BSAs concurrent with the reconnaissance-level field assessment. No potential aquatic resources were observed within any of the BSAs (see Figure 5.3-5, *Ione Junior High School: NWI Mapped Aquatic Feature,* and Figure 5.4-6, *Sutter Creek School: NWI Mapped Aquatic Feature*).

Figure 5.3-1 - Argonaut High School: Biological Study Area with Vegetation Communities/Land Cover

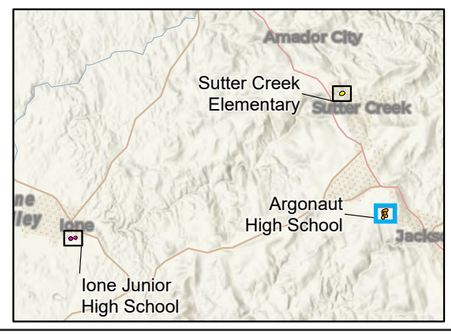
Study Area

Argonaut High School BSA - 1.28 ac.

Vegetation Communities and Land Cover Types

Developed

Oak Woodlands



0 200
Scale (Feet)

Source: ECORP Consulting, Inc 2023.

5. Environmental Analysis
BIOLOGICAL RESOURCES

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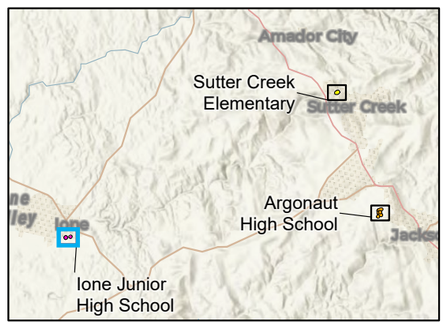
Figure 5.3-2 - Ione Junior High School: Biological Study Area with Vegetation Communities/Land Cover

Study Area

Ione Junior High School BSA - 0.46 ac.

Vegetation Communities and Land Cover Types

Developed



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Scale (Feet)

Source: ECORP Consulting, Inc 2023.

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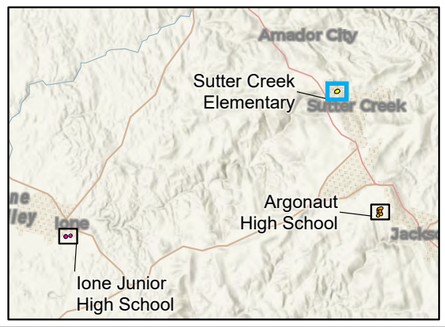
Figure 5.3-3 - Sutter Creek Elementary School: Biological Study Area with Vegetation Communities/Land Cover

Study Area

Sutter Creek Elementary BSA - 0.84 ac.

Vegetation Communities and Land Cover Types

Developed



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Scale (Feet)

Source: ECORP Consulting, Inc 2023.

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Figure 5.3-4 - Argonaut High School: NWI Mapped Aquatic Feature

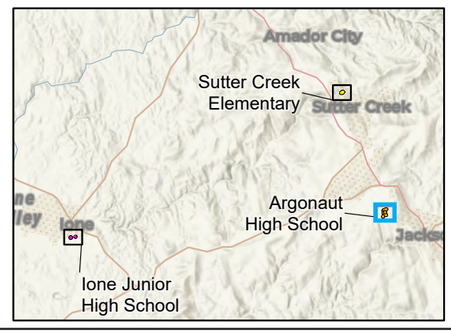
Study Area

Argonaut High School BSA - 1.28 ac.

Aquatic Resource Type

Freshwater Pond

Riverine



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Scale (Feet)

Source: ECORP Consulting, Inc 2023.

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Figure 5.3-5 - Ione Junior High School: NWI Mapped Aquatic Feature

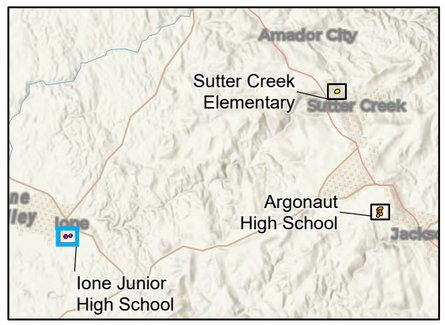
Study Area

Ione Junior High School BSA - 0.46 ac.

Aquatic Resource Type

Freshwater Pond

Riverine



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Scale (Feet)

Source: ECORP Consulting, Inc 2023.

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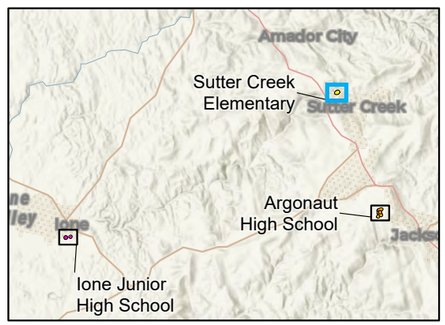
Figure 5.3-6 - Sutter Creek Elementary School: NWI Mapped Aquatic Feature

Study Area

Sutter Creek Elementary BSA - 0.84 ac.

Aquatic Resource Type

Riverine



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Source: ECORP Consulting, Inc 2023.

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Sensitive Resources

Plants

Primary plant species identified with each BSA are discussed in the descriptions of land cover/vegetation communities, above. A full list of plants observed in the BSAs can be found in Appendix C of the BRA (attached as Appendix E to the DEIR).

Sensitive Plants

No sensitive special status plants were observed during the field surveys of the BSAs. However, as detailed in Table 5.3-1, *Sensitive Plant Species Potentially Present in the BSAs,* special status plants were identified through database queries, literature review, and CNDDB mapped occurrences.

Table 5.3-1 Sensitive Plant Species Potentially Present in the BSAs

Scientific Name	Common Name	Federal/State Status	Other Status	Potential to Occur On-Site
Arctostaphylos myrtifolia	Ione manzanita	FT	1B.2	Low potential to occur. The Ione Study Area occurs on the Ione Formation; however, this species typically grows in chaparral which is absent. The patch of oak trees within the Ione BSA may provide suitable habitat for this species.
Balsamorhiza macrolepis	Big-scale balsamroot	-	1B.2	Low potential to occur. The oak woodland within the Argonaut BSA may provide suitable habitat for this species; however, the only occurrence in the vicinity is historic. There is one CNDDB recorded occurrence of this species within 5 miles of the search area.
Calycadenia hooveri	Hoover's calycadenia	-	1B.3	Low potential to occur. The oak woodlands within the Argonaut BSA and the patch of oak trees in the Ione BSA may provide suitable habitat for this species, but the few occurrences in the vicinity are historic.
Chlorogalum grandiflorum	Red Hills soaproot	-	1B.2	Potential to occur. The oak woodlands in the Argonaut BSA, patch of oak trees in the Ione BSA, and the disturbed areas within the Argonaut, Ione, and Sutter Creek BSAs may provide suitable habitat for this species. Potential to occur is lower at the Ione BSA due to its lower elevation.
Downingia pusilla	Dwarf downingia	-	2B.2	Absent. No suitable habitat within the BSAs.
Eriogonum apricum var. apricum	Ione buckwheat	FE, CE	1B.1	Absent. No suitable habitat within the BSAs.
Eriogonum apricum var. prostratum	Irish Hill buckwheat	FE, CE	1B.1	Absent. No suitable habitat within the BSAs.
Eryngium pinnatisectum	Tuolumne button–celery	-	1B.2	Absent. No suitable habitat within the BSAs.
Erythranthe marmorata	Stanislaus monkeyflower	-	1B.1	Low potential to occur. The oak woodlands within the Argonaut BSA and the patch of oak trees in the Ione BSA may provide suitable habitat for this species, but the few occurrences in the vicinity are historic. There is one CNDDB recorded occurrence of this species within 5 miles of the search area.
Gratiola heterosepala	Boggs Lake hedge–hyssop	CE	1B.2	Absent. No suitable habitat within the BSAs.

Table 5.3-1 Sensitive Plant Species Potentially Present in the BSAs

Scientific Name	Common Name	Federal/State Status	Other Status	Potential to Occur On-Site
Horkelia parryi	Parry's horkelia	-	1B.2	Potential to occur. The oak woodlands within the Argonaut BSA and the patch of oak trees in the Ione BSA may provide suitable habitat for this species. Potential to occur is lower at the Ione BSA due to lower elevation. There are seven CNDDB recorded occurrences of this species within 5 miles of the search area.
Legenere limosa	Legenere	-	1B.1	Absent. No suitable habitat within the BSAs.
Navarretia myersii ssp. myersii	Pincushion navarretia	-	1B.1	Absent. No suitable habitat within the BSAs.
Navarretia paradoxiclara	Patterson's navarretia	-	1B.3	Absent. No suitable habitat within the BSAs.
Orcuttia viscida	Sacramento Orcutt grass	FE, CE	1B.1	Absent. No suitable habitat within the BSAs.
Sagittaria sanfordii	Sanford's arrowhead	-	1B.2	Absent. No suitable habitat within the BSAs.
Sphenopholis obtusata	Prairie wedge grass	-	2B.2	Absent. No suitable habitat within the BSAs.

Source: ECORP 2023. (Appendix E)

Status Codes:

FESA	Federal Endangered Species Act
FE	FESA listed, Endangered
FT	FESA listed, Threatened
FC	Candidate for FESA listing as Threatened or Endangered
BCC	USFWS Bird of Conservation Concern (USFWS 2021)
CE	CESA- or NPPA listed, Endangered
CT	CESA- or NPPA-listed, Threatened
CC	Candidate for CESA listing as Endangered or Threatened
CFP	California Fish and Game Code Fully Protected Species (§3511-birds, § 4700-mammals, §5050-reptiles/amphibians)
SSC	CDFW Species of Special Concern
CDFW WL	CDFW Watch List
1B	CRPR/Rare or Endangered in California and elsewhere
2B	CRPR/Plants rare, threatened, or endangered in California but more common elsewhere
0.1	Threat Rank/Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
0.2	Threat Rank/Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
0.3	Threat Rank/Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

The following plants may have the potential to occur onsite and therefore further information is provided.

Ione Manzanita

Ione manzanita (*Arctostaphylos myrtifolia*) is listed as threatened pursuant to the federal ESA, is not listed pursuant to the California ESA, and is designated as a CRPR 1B.2 species. This perennial evergreen shrub occurs in chaparral and cismontane woodlands associated with very acidic, nutrient-poor, coarse soils typical of the Ione Formation. Ione manzanita blooms from November through March and is known to occur at elevations ranging from 195 to 1,905 feet above MSL. Ione manzanita is endemic to California; the current range for this species includes Amador and Calaveras counties.

There are three mapped CNDDB occurrences of this species located within five miles of the search area. The patch of remnant oak woodland within the Ione BSA may provide marginally suitable habitat for this species. Ione manzanita has low potential to occur within the Ione BSA and is absent from the Argonaut and Sutter Creek BSAs.

Big-Scale Balsamroot

Big-scale balsamroot (*Balsamorhiza macrolepis*) is not listed pursuant to either the federal or California ESAs but is designated as a CRPR 1B.2 species. This species is an herbaceous perennial that occurs in chaparral, cismontane woodlands, valley and foothill grassland, and sometimes on serpentinite soils. Bigscale balsamroot blooms from March through June and is known to occur at elevations ranging from 150 to 5,100 feet above MSL. Big-scale balsamroot is endemic to California; the current range of this species includes Alameda, Amador, Butte, Colusa, El Dorado, Lake, Mariposa, Napa, Placer, Santa Clara, Shasta, Solano, Sonoma, Tehama, and Tuolumne counties.

There is one mapped CNDDB occurrence of this species located within 5 miles of the search area. The oak woodland within the Argonaut and Ione BSAs may provide suitable habitat for this species; however, the only occurrence in the vicinity is historic. Big-scale balsamroot has low potential to occur within the Argonaut and Ione BSAs and is absent from the Sutter Creek BSA.

Hoover's Calycadenia

Hoover's calycadenia (*Calycadenia hooveri*) is not listed pursuant to either the federal or California ESAs but is designated as a CRPR 1B.3 species. This plant is an herbaceous annual that occurs in rocky soils in cismontane woodland and valley and foothill grassland. Hoover's calycadenia blooms from July through September and is known to occur at elevations ranging from 215 to 985 feet above MSL. Hoover's calycadenia is endemic to California; the current range for this species includes Calaveras, Madera, Merced, Mariposa, San Joaquin, and Stanislaus counties.

There are no mapped CNDDB occurrences of this species located within 5 miles of the search area. The oak woodlands within the Argonaut and Ione BSAs may provide marginally suitable habitat for this species, but the few occurrences in the vicinity are historic. Hoover's calycadenia has low potential to occur within the Argonaut and Ione BSAs and is absent from the Sutter Creek BSA.

Red Hills Soaproot

Red Hills soaproot (Chlorogalum grandiflorum) is not listed pursuant to either the federal or California ESAs but is designated as a CRPR 1B.2 plant. This species is a bulbiferous perennial herb that typically occurs on serpentinite, gabbroic, and other soils in chaparral, cismontane woodland, and lower montane coniferous forest communities. Red Hills soaproot blooms from May through June and is known to occur at elevations ranging from 805 to 5,545 feet above MSL. Red Hill soaproot is endemic to California; the current range of this species includes Amador, Calaveras, El Dorado, Placer, and Tuolumne counties.

There are no mapped CNDDB occurrences of this species located within 5 miles of the search area. The oak woodlands and ruderal areas within the Argonaut and Ione BSAs and the ruderal areas within the Sutter Creek

BSAs may provide suitable habitat for this species. The potential to occur is lower at the Ione BSA due to lower elevation. Red hills soaproot has potential to occur within the three BSAs.

Stanislaus Monkeyflower

Stanislaus monkeyflower (*Erythranthe marmorata*) is not listed pursuant to either the federal or California ESAs but is designated as a CRPR 1B.1 species. This species is an herbaceous annual that occurs in cismontane woodland and lower montane coniferous forests. Stanislaus monkeyflower blooms from March through May and is known to occur at elevations ranging from 330 to 2,955 feet above MSL. Stanislaus monkeyflower is endemic to California; its current range includes Amador, Calaveras, Fresno, Stanislaus, and Tuolumne counties.

There is one CNDDB recorded occurrence of this species within 5 miles of the search area. The oak woodlands within the Argonaut and Ione BSAs may provide marginally suitable habitat for this species; however, the few occurrences in the vicinity are historic. Stanislaus Monkeyflower has low potential to occur within the Argonaut and Ione BSAs and is absent from the Sutter Creek BSA.

Parry's Horkelia

Parry's horkelia (*Horkelia parryi*) is not listed pursuant to either the federal or California ESAs but is designated as a CRPR 1B.2 species. This species is a small, herbaceous perennial that occurs in chaparral and cismontane woodlands and is associated with very acidic, nutrient-poor, coarse soils typical of the Ione Formation. Parry's horkelia blooms from April through September and is known to occur at elevations ranging from 260 to 3,510 feet above MSL. Parry's horkelia is endemic to California; the current range for this species includes Amador, Calaveras, El Dorado, Mariposa, and Tuolumne counties.

There are seven CNDDB recorded occurrences of this species within 5 miles of the search area. The oak woodlands within the Argonaut and Ione BSAs may provide suitable habitat for this species. Parry's horkelia has potential to occur within the Argonaut and Ione BSAs and is absent from the Sutter Creek BSA.

Wildlife

Wildlife species observed at the Argonaut BSA includes house sparrows and mourning doves; barn swallows at the Ione BSA; and red-shouldered hawks, killdeers, and turkey vultures at the Sutter Creek BSA. Other species associated with the land cover/vegetation communities at the campus BSAs include western gray squirrel (*Sciurus griseus*), Virgina opossum (*Didelphis virginiana*), raccoon (*Procyon lotor*), striped skunk (*Mephitis mephitis*), California scrub jay (Aphelocoma californica), house finch (*Haemorhous mexicanus*), and mule deer (*Odocoileus hemionus*). A full list of wildlife species observed at all the BSAs is included in Appendix D of the biological resources assessment (see Appendix E).

Sensitive Wildlife

As detailed in Table 5.3-2, *Sensitive Wildlife Species Potentially Present Onsite,* special status wildlife species were identified through database queries, literature review, and CNDDB mapped occurrences. The potential for each species to occur on-site due to a suitable habitat was identified and ranges from absent to the potential of suitable habitat within the BSAs.

Table 5.3-2 Sensitive Wildlife Species Potentially Present Onsite

Scientific Name	Common Name	Federal/State Status	Other status	Potential to Occur on-site
Invertebrates				
Bombus crotchii	Crotch bumble bee	CC	-	Absent. No suitable habitat within the BSAs.
Branchinecta lynchi	Vernal pool fairy shrimp	FT	-	Absent. No suitable habitat within the BSAs.
Danaus plexippus	Monarch butterfly	FC	-	Absent. No suitable habitat within the BSAs.
Desmocerus californicus dimorphus	Valley elderberry longhorn beetle	FT	-	Absent. No elderberry host plants found within the BSAs.
Lepidurus packardi	Vernal pool tadpole shrimp	FE	-	Absent. No suitable habitat within the BSAs.
Fish				
Oncorhynchus mykiss irideus	Steelhead (CA Central Valley DPS)	FT	-	Absent. No suitable habitat within the BSAs.
Amphibians				
Rana draytonii	California red-legged frog	FT	SSC	Absent. No suitable habitat within the BSAs.
Rana boylii	Foothill yellow-legged Frog East/Southern Sierra Clade	None/SC	SSC	Absent. No suitable habitat within the BSAs.
Spea hammondii	Western spadefoot	-	SSC	Absent. No suitable habitat within the BSAs.
Ambystoma californiense	California tiger salamander (Central California DPS)	FT, CT	CDFW WL	Absent. No suitable habitat within the BSAs.
Reptiles				
Actinemys marmorata	Northwestern pond turtle	-	*SSC*	Absent. No suitable habitat within the BSAs.
Thamnophis gigas	Giant garter snake	FT, CT	-	Absent. No suitable habitat within the BSAs.
Birds				
Aechmophorus occidentalis	Western grebe	-	BCC	Absent. No suitable habitat within the BSAs.
Aechmophorus clarkii	Clark's grebe	-	BCC	Absent. No suitable habitat within the BSAs.
Selasphorus sasin	Allen's hummingbird	-	BCC	Absent. Does not breed in the region.
Larus californicus	California gull (nesting colony)	-	BCC, CDFW WL	Absent. No nesting habitat within the BSAs.
Aquila chrysaetos	Golden eagle	-	CFP, CDFW WL	Absent. No suitable nesting or foraging habitat within the BSAs.
Haliaeetus leucocephalus	Bald eagle	De-listed/CE	CFP	Absent. No suitable nesting or foraging habitat within the BSAs.
Buteo swainsoni	Swainson's hawk	CT	-	Absent. BSAs are outside species range.
Athene cunicularia	Burrowing owl	-	BCC, SSC	Absent. No suitable habitat in the BSAs due to foothill location and level of disturbance.
Strix nebulosa	Great gray owl	CE	-	Absent. No suitable habitat within the BSAs.
Dryobates nuttallii	Nuttall's woodpecker	-	BCC	Potential. The patch of oak trees in the Ione BSA and the oak woodlands in the Argonaut BSA may provide suitable nesting habitat for this species.
Pica nuttallii	Yellow-billed magpie	-	BCC	Potential. Larger trees within the Argonaut and Ione BSAs may provide suitable nesting habitat for this species.

5. Environmental Analysis

BIOLOGICAL RESOURCES

Table 5.3-2 Sensitive Wildlife Species Potentially Present Onsite

Scientific Name	Common Name	Federal/State Status	Other status	Potential to Occur on-site
Baeolophus inornatus	Oak titmouse	-	BCC	Potential. The trees in the Argonaut and Ione BSAs may provide suitable nesting habitat for this species.
Riparia riparia	Bank swallow	CT	-	Absent. No suitable nesting habitat within the BSAs.
Chamaea fasciata	Wrentit	-	BCC	Absent. No suitable habitat within the BSAs.
Toxostoma redivivum	California thrasher	-	BCC	Absent. No suitable habitat within the BSAs.
Spinus lawrencei	Lawrence's goldfinch	-	BCC	Potential. The weedy edges in the Argonaut and Ione BSAs may provide suitable nesting habitat for this species.
Ammodramus savannarum	Grasshopper sparrow	-	BCC, SSC	Absent. No suitable nesting habitat within the BSAs.
Passerculus sandwichensis beldingi	Belding's savannah sparrow	CE	BCC	Absent. The BSAs are outside of species range.
Agelaius tricolor	Tricolored blackbird	CT	BCC, SSC	Absent. No suitable nesting habitat within the BSAs.
Icterus bullockii	Bullock's oriole	-	BCC	Potential. The oak woodland in the Argonaut BSA may provide suitable habitat for this species. The high level of disturbance and small patch of oak trees at the Ione BSA does not provide suitable nesting habitat for this species.
Geothlypis trichas sinuosa	Saltmarsh common yellowthroat	-	BCC, SSC	Absent. The BSAs are outside of species range.
Mammals				
Antrozous pallidus	Pallid bat	-	SSC	Potential. Trees and structures within the Ione and Argonaut BSAs may provide suitable roosting habitat for this species.
Corynorhinus townsendii	Townsend's big-eared bat	-	SSC	Low potential. The trees and structures within the Ione and Argonaut BSAs may provide suitable roosting habitat for this species but habitat is considered marginal due to a high level of disturbance.

Table 5.3-2 Sensitive Wildlife Species Potentially Present Onsite

Scientific Name	Common Name	Federal/State Status	Other status	Potential to Occur on-site

Source: ECORP Consulting 2023.(Appendix E)
Status Codes:

FESA	Federal Endangered Species Act
FE	FESA listed, Endangered
FT	FESA listed, Threatened
FC	Candidate for FESA listing as Threatened or Endangered
BCC	USFWS Bird of Conservation Concern (USFWS 2021)
CE	CESA- or NPPA listed, Endangered
CT	CESA- or NPPA-listed, Threatened
CC	Candidate for CESA listing as Endangered or Threatened
CFP	California Fish and Game Code Fully Protected Species (§3511-birds, § 4700-mammals, §5050-reptiles/amphibians)
SSC	CDFW Species of Special Concern
CDFW WL	CDFW Watch List
1B	CRPR/Rare or Endangered in California and elsewhere
2B	CRPR/Plants rare, threatened, or endangered in California but more common elsewhere
0.1	Threat Rank/Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)
0.2	Threat Rank/Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)
0.3	Threat Rank/Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

The following wildlife may have potential to occur onsite and therefore, further information is provided below.

Nuttall's Woodpecker

The Nuttall's woodpecker (*Dryobates nuttallii*) is not listed or protected under either the California or federal ESAs but is considered a USFWS BCC. They are residents from Siskiyou County south to Baja California. Nuttall's woodpeckers nest in tree cavities primarily within oak woodlands, but also can be found in riparian woodlands. Breeding occurs from April through July.

There are no CNDDB recorded occurrences of this species within 5 miles of the search area. Oak trees in the Ione and Argonaut BSAs may provide suitable nesting habitat for this species. Nuttall's woodpecker has potential to occur within the Ione and Argonaut BSAs but is absent from the Sutter Creek BSA.

Yellow-Billing Magpie

The yellow-billed magpie (*Pica nuttalli*) is not listed pursuant to either the California or federal ESAs but is considered a USFWS BCC. This endemic species is a yearlong resident of the Central Valley and Coast Ranges from San Francisco Bay to Santa Barbara County. Yellow-billed magpies build large, bulky nests in trees in a variety of open woodland habitats, typically near grassland, pastures or cropland. Nest building begins in late January to mid-February, which may take up to 6 to 8 weeks to complete, with eggs laid from April through May, and fledging from May through June. The young leave the nest about 30 days after hatching. Yellow-billed magpies are highly susceptible to West Nile Virus, which may have been the cause of death to thousands of magpies during 2004-2006.

There are no CNDDB recorded occurrences of this species within 5 miles of any of the search area. Larger trees within Ione and Argonaut BSAs may provide suitable nesting habitat for this species. Yellow-billed magpie has potential to occur within the Ione and Argonaut BSAs and is absent from the Sutter Creek BSA.

Oak Titmouse

Oak titmouse (*Baeolophus inornatus*) is not listed or protected under either the California or federal ESAs but is considered a USFWS BCC. Oak titmouse breeding range includes southwestern Oregon south through California's Coast, Transverse, and Peninsular ranges, western foothills of the Sierra Nevada, into Baja California; they are absent from the humid northwestern coastal region and the San Joaquin Valley. They are found in dry oak or oak-pine woodlands but may also use scrub oaks or other brush near woodlands. Nesting occurs during March through July.

There are no CNDDB recorded occurrences of this species within 5 miles of the search area. Larger trees within the Ione and Argonaut BSAs may provide suitable nesting habitat for this species. Oak titmouse has potential to occur within the Ione and Argonaut BSAs and is absent from the Sutter Creek BSA.

Lawrence's Goldfinch

Lawrence's goldfinch (*Spinus lawrencei*) is not listed pursuant to either the California or federal ESAs but is currently a USFWS BCC. Lawrence's goldfinches breed west of the Sierra Nevada-Cascade axis from Tehama, Shasta, and Trinity counties south into the foothills surrounding the Central Valley to Kern County; and on the

Coast Range from Contra Costa County to Santa Barbara County. Lawrence's goldfinches nest in arid woodlands usually with brushy areas, tall annual weeds, and a local water source. Nesting occurs during March through September.

There are no CNDDB recorded occurrences of this species within 5 miles of the search area. The weedy edges in the Ione and Argonaut BSAs may provide suitable habitat for this species. Lawrence's goldfinch has potential to occur within the Ione and Argonaut BSAs and is absent from the Sutter Creek BSA.

Bullock's Oriole

Bullock's oriole (*Icterus bullockii*) is not listed pursuant to either the California or federal ESAs but is currently a USFWS BCC. In California, Bullock's orioles are found throughout the state except the higher elevations of mountain ranges and the eastern deserts (Small 1994). They are found in riparian and oak woodlands where nests are built in deciduous trees, but may also use orchards, conifers, and eucalyptus trees. Nesting occurs from March through July.

There are no CNDDB recorded occurrences of this species within 5 miles of any of the search area. The oak woodland in the Argonaut and Ione BSAs may provide suitable habitat for this species. Bullock's Oriole has potential to occur within the Argonaut and Ione BSAs and is absent from the Sutter Creek BSA.

Pallid Bat

The pallid bat (*Antrozous pallidus*) is not listed pursuant to either the federal or California ESAs; however, this species is considered an SSC by CDFW. The pallid bat is a large, light-colored bat with long, prominent ears and pink, brown, or grey wing and tail membranes. This species ranges throughout North America from the interior of British Columbia, south to Mexico, and east to Texas. The pallid bat inhabits low elevation (below 6,000 feet above MSL) rocky arid deserts and canyonlands, shrub-steppe grasslands, karst formations, and high elevation (above 7,000 feet above MSL) coniferous forest. This species roosts alone or in groups in the crevices of rocky outcrops and cliffs, caves, mines, trees, and in various human structures such as bridges and barns. The pallid bat Is a feeding generalist that gleans a variety of arthropod prey from surfaces as well as capturing insects on the wing. Foraging occurs over grasslands, oak savannahs, ponderosa pine forests, talus slopes, gravel roads, lava flows, fruit orchards, and vineyards. Although this species utilizes echolocation to locate prey, they often use only passive acoustic cues. This species is not thought to migrate long distances between summer and winter sites.

There are no CNDDB recorded occurrences of this species within 5 miles of the search area. The oak woodland and existing storage buildings in the Argonaut and Ione BSAs may provide suitable habitat for this species. Pallid bat has potential to occur within the Argonaut and Ione BSAs and is absent from the Sutter Creek BSA.

Townsend's Big-Eared Bat

The Townsend's big-eared bat (*Corynorhinus townsendii*) is not listed pursuant to either the California or federal ESAs; however, this species is considered an SSC by CDFW. The Townsend's big-eared bat is a fairly large bat with prominent bilateral noes lumps and large rabbit-like ears. This species occurs throughout the west and

ranges from the southern portion of British Columbia south along the Pacific coast to central Mexico and east into the Great Plains. The Townsend's big-eared bat has been reported from a wide variety of habitat types and elevations from sea level to 10,827 feet above MSL. Habitats used include coniferous forests, mixed mesophytic forests, deserts, native prairies, riparian communities, active agricultural areas, and coastal habitat types. Its distribution is strongly associated with the availability of caves and cave-like roosting habitat including abandoned mines, buildings, bridges, rock crevices, and hollow trees. This species is readily detectable when roosting due to their habit of roosting pendant-like on open surfaces. The Townsend's big-eared bat is a moth specialist, composing more than 90 percent of its diet. Foraging habitat is generally edge habitats along streams adjacent to and within a variety of wooded habitats. This species often travels long distances when foraging and large home ranges have been documented in California.

There are no CNDDB recorded occurrences of this species within 5 miles of the search area. The trees and existing storage buildings in the Argonaut and Ione BSAs may provide suitable habitat for this species. Townsend's big-eared bat has potential to occur within the Argonaut and Ione BSAs and is absent from the Sutter Creek BSA.

Wildlife Movement Corridors

Argonaut High School

The biological resource assessment determined that the Argonaut BSA is within sections of essential habitat connectivity areas mapped by CDFW; however, due to the developed nature of the BSA, the BSA does not have the potential to function as a wildlife corridor or wildlife movement area.

No wildlife nursery sites have been documented within the BSA, and none were observed during the field assessment. Due to the disturbed nature of the BSA, it is unlikely to support nursery sites aside from potential bat maternity colonies at the Argonaut BSA.

Ione Junior High School

The biological resource assessment determined the Ione Junior BSA is not within sections of essential habitat connectivity areas as mapped by CDFW, and therefore does not have the potential to function as a wildlife corridor or wildlife movement area.

No wildlife nursery sites have been documented within the BSA, and none were observed during the field assessment. Due to the disturbed nature of the BSA, it is unlikely to support nursery sites aside from potential bat maternity colonies at the Ione BSA.

Sutter Creek Elementary School

The biological resource assessment determined the Sutter Creek BSA is within sections of essential habitat connectivity areas mapped by CDFW; however, due to the developed nature of the BSA, the BSA does not have the potential to function as a wildlife corridor or wildlife movement area.

No wildlife nursery sites have been documented within any of the BSA, and none were observed during the field assessment. Due to the disturbed nature of the BSA, it is unlikely to support nursery sites.

5.3.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

B-1 Have a substantial effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

B-2 Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service.

B-3 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.

B-4 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.

B-5 Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

B-6 Conflict with the provisions of an adopted habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

5.3.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.3-1: Development of the proposed project may have the potential to impact special status plants and animal species. [Threshold B-1]

Sensitive biological resources are habitats or species that have been recognized by federal, state, and/or local agencies as endangered, threatened, rare, or in decline throughout all or part of their historical distribution. As discussed under Section 5.3.1.2, *Existing Conditions*, above, there are no critical habitat nor Essential Fish Habitat within any of the BSAs. The biological resources assessment determined that there are no mapped aquatic features within the BSAs. No potential aquatic resources were observed within any of the BSAs.

Argonaut High School Site Improvements

The construction of the site improvements at Argonaut HS would be limited to the BSA on the campus. The biological resource assessment determined the 1.28-acre Argonaut BSA has the potential to be a suitable habitat for special status plants and animals. There are five special status plants with a potentially suitable habitat in the Argonaut BSA—big-scale balsamroot, Hoover's calycadenia, Red Hills soaproot, Stanislaus monkeyflower, and Parry's horkelia.

There are seven special status animals that have the potential to occur within the Argonaut BSA—Nuttall's woodpecker, yellow-billed magpie, oak titmouse, Lawrence's goldfinch, Bullock's oriole, pallid bat, and Townsend's big-eared bat. The biological resources assessment determined that special status wildlife species may be present in existing storage structures and oak woodland areas in the BSA. Large oak trees and storage structures in the Argonaut BSA represent potential roosting habitat for pallid and Townsend's big-eared bats. If occupied bat roosts are present, removal of the habitat feature could result in injury or death of special-status bats. Removal during the maternity roosting season could result in the loss of an established maternity roosting site and injury or death of pups that are not yet able to fly. Removal of a roost site during the winter season could result in direct injury or death of special-status bats, particularly during time periods of colder weather or heavy rain, when bats are more likely to be in torpor.

The land coverage in the Argonaut BSA is comprised of developed/disturbed land and oak woodlands within an existing school campus. No sensitive species were documented within Argonaut BSA during the site reconnaissance visit on June 23, 2023. The biological resource assessment determined that there are no critical habitats within the Argonaut BSA.

Since special status species may be present onsite, impacts to special status species would be **potentially significant**.

Operation of the proposed project at Argonaut HS would be similar to existing conditions and would not affect potential special status species on the campus. A **less than significant impact** would occur.

Ione Junior High School Site Improvements

The construction of the site improvements at Ione Junior HS would be limited to the BSA on the campus. The biological resource assessment determined the 0.46-acre Ione BSA has the potential to be a suitable habitat for special status plants and animals. There are six special status plants with potentially suitable habitat in the Ione BSA which includes the Ione manzanita, big-scale balsamroot, Hoover's calycadenia, Red Hills soaproot, Stanislaus monkeyflower, and Parry's horkelia.

There are seven special status animals with a potentially suitable within the Ione BSA— Nuttal's woodpecker, yellow-billed magpie, oak titmouse, Lawrence's goldfinch, Bullock's oriole, pallid bat, and Townsend's big-eared bat. The biological resources assessment determined that special status special status wildlife species may be present in existing storage building and on trees in the BSA. Large oak trees and storage structures in the Ione BSA represent potential roosting habitat for pallid and Townsend's big-eared bats. If occupied bat roosts are present, removal of the habitat feature could result in injury or death of special-status bats. Removal during the

maternity roosting season could result in the loss of an established maternity roosting site and injury or death of pups that are not yet able to fly. Removal of a roost site during the winter season could result in direct injury or death of special-status bats, particularly during time periods of colder weather or heavy rain, when bats are more likely to be in torpor.

The land coverage within the Ione BSA is considered completely developed/disturbed with a small grouping of native oak trees between the disturbed/developed areas of the Ione BSA. No sensitive species were documented within Ione BSA during the site reconnaissance visit on June 23, 2023. The biological resource assessment determined that there are no critical habitats within the Ione BSA. Since special status species may be present onsite, impacts to special status species would be **potentially significant**.

Operation of the proposed project at Ione Junior HS would be similar to existing conditions and would not affect potential special status species on the campus. A **less than significant impact** would occur.

Sutter Creek Elementary School Site Improvements

The construction of the site improvements at Sutter Creek ES would be limited to the BSA on the campus. The biological resource assessment determined the 0.97-acre Sutter Creek BSA has the potential to be a suitable habitat for one special status plant species—Red Hills soaproot. The biological resource assessment determined the disturbed areas within the Sutter Creek BSA may provide suitable habitat for the Red Hills soaproot. No special status wildlife species are anticipated within the Sutter Creek BSA.

The land coverage within the Sutter Creek BSA is considered completely developed/disturbed. No sensitive species were documented within Sutter Creek BSA during the site reconnaissance visit on June 23, 2023. The biological resource assessment determined that there are no critical habitats within the Sutter Creek BSA. Since the Red Hills soaproot may be present onsite, impacts to the special status species would be **potentially significant**.

Operation of the proposed project at Sutter Creek ES would be similar to existing conditions and would not affect potential special status species on the campus. A **less than significant impact** would occur.

Level of Significance Before Mitigation: Potentially significant.

Impact 5.3-2: Development of the proposed project would not result in the loss of any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service. [Threshold B-2]

Argonaut High School Site Improvements

The two land cover/vegetation communities observed within Argonaut BSA during the site reconnaissance visit on June 23, 2023, include one vegetated (Blue Oak Woodland) and one unvegetated (disturbed/developed) land cover. The land cover/vegetation communities are not considered sensitive natural communities. As discussed under Section 5.3.1.2, *Existing Conditions*, above, there are no aquatic resources within the Argonaut BSA. The construction of the Argonaut HS site improvements would not affect other areas of the campus.

Therefore, construction activities at Argonaut HS would **not impact** riparian habitat or other sensitive natural community.

The Argonaut HS campus is developed and operates as a HS campus. The biological resources assessment identified a riverine feature north of Argonaut BSA which has previously been filled and realigned as a result of school and residential construction (see Figure 5.3-4, *Argonaut High School: Aquatic Resources)*. The proposed project would continue to operate the campus as a HS and use these areas consistent with existing conditions. Therefore, operation of the proposed project at Argonaut HS would result in a **less than significant impact** to riparian habitats or other sensitive natural communities during operation.

Ione Junior High School Site Improvements

As shown in Figure 5.3-2, above, the Ione BSA includes disturbed/developed land. The Ione BSA also includes a small grouping of oak trees. The land cover/vegetation communities are not considered sensitive natural communities. As discussed under Section 5.3.1.2, *Existing Conditions*, above, there are no aquatic resources within the Ione BSA. No sensitive natural communities or riparian habitat were identified within the Ione BSA. The construction of the Ione Junior HS site improvements would not affect other areas of the campus. As shown in Figure 5.3-5, no aquatic features occur on Ione Junior HS campus. The campus is currently developed with school/educational uses and would continue to operate with educational uses. Therefore, construction and operation of the project site at Ione Junior HS would not impact riparian or other sensitive natural community.

Sutter Creek Elementary School Site Improvements

As shown in Figure 5.3-3, above, the Sutter Creek BSA includes disturbed/developed land. The land cover/vegetation communities are not considered sensitive natural communities. As discussed under Section 5.3.1.2, *Existing Conditions*, above, there are no aquatic resources within the Sutter Creek BSA. No sensitive natural communities or riparian habitat were identified within the Sutter Creek BSA. The construction of the Sutter Creek ES site improvements would not affect other areas of the campus. As shown in Figure 5.3-6, no aquatic features occur on Sutter Creek ES campus. The campus is currently developed with school/educational uses and would continue to operate with educational uses. Therefore, construction and operation of the project site at Sutter Creek ES would not impact riparian or other sensitive natural community.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.3-3: The proposed project would not have a substantial adverse effect on state or federally protected wetlands through the direct removal, filling, hydrological interruption or other means. [Threshold B-3]

Argonaut High School Site Improvements

Construction activities associated with the proposed project are limited to the BSA. As discussed under Impact 5.3-2, there are no aquatic resources within the Argonaut BSA. Therefore, construction of site improvements at Argonaut HS would not remove, fill, or result in the hydrological interruption of wetland features. Therefore, construction activities at Argonaut HS would **not impact** wetlands.

As discussed in Section 5.3.1.2, *Existing Conditions*, and under Impact 5.3-2, above, NWI identifies a riverine feature that runs through Argonaut HS campus, north of the Argonaut BSA (see Figure 5.3-4). However, the riverine feature crosses the baseball field, paved/turf areas, and the stadium on the Argonaut HS campus. The proposed project would continue to operate the campus as a HS and use these areas consistent with existing conditions. Therefore, operation of the proposed project at Argonaut HS would result in a **less than significant impact** to wetlands during operation.

Ione Junior High School Site Improvements

The biological resources assessment determined that there no aquatic resources within the Ione BSA, and no aquatic resources exist on Ione Junior HS campus. Therefore, **no impacts** to state or federally protected wetlands would occur.

Sutter Creek Elementary School Site Improvements

The biological resources assessment determined that there no aquatic resources within the Sutter Creek BSA, and no aquatic resources exist on Sutter Creek ES campus. Therefore, **no impacts** to state or federally protected wetlands would occur.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.3-4: The proposed project would affect wildlife movement or a wildlife corridor species; however, the proposed project could interfere with a native wildlife nursery site. [Threshold B-4]

Argonaut High School Site Improvements

The Argonaut HS campus is entirely developed and operates with educational/school uses. Construction of the site improvements are limited to the BSA. As previously discussed in Section 5.3.1.2, *Existing Conditions*, although the Argonaut BSA is in sections of essential habitat connectivity areas mapped by CDFW, the BSA does not have the potential to function as a wildlife corridor or wildlife movement area due to its developed nature. Therefore, the construction and operation of the proposed project at Argonaut HS would result in a **less than significant impact** to wildlife movement.

The CNDDB and the site reconnaissance visit on June 23, 2023, determined there were no recorded nursery sites within the BSA. However, the Argonaut BSA has the potential to be a suitable habitat for seven special status animals, which are special status birds or bats that may nest or roost on-site. Therefore, construction of the site improvements at Argonaut HS related to native wildlife nursery are **potentially significant**.

Since the Argonaut HS campus currently operates with educational/school uses and would continue to operate with educational/school uses, the operation of the proposed project at Argonaut HS would result in a **less than significant impact** to potential nursery sites.

Ione Junior High School Site Improvements

The Ione Junior HS campus is entirely developed and operates with educational/school uses. As previously discussed in Section 5.3.1.2, *Existing Conditions*, the Ione BSA is not within sections of essential habitat connectivity areas mapped by CDFW, and therefore, the BSA does not have the potential to function as a wildlife corridor or wildlife movement area. Therefore, the proposed site improvements at Ione Junior HS would result in a **less than significant impact** to wildlife movement.

The CNDDB and the site reconnaissance visit on June 23, 2023, determined there were no recorded nursery sites. However, the Ione BSA has the potential to be a suitable habitat for seven special status animals, which are special status birds or bats that may nest or roost on-site. Therefore, construction of the site improvements at Ione Junior HS related to native wildlife nursery are **potentially significant**.

Since the Ione Junior HS campus currently operates with educational/school uses and would continue to operate with educational/school uses, the operation of the proposed project at Ione Junior HS would result in a **less than significant impact** to potential nursery sites.

Sutter Creek Elementary School Site Improvements

The Sutter Creek ES campus is entirely developed and operates with educational/school uses. Construction of the site improvements are limited to the BSA. As previously discussed in Section 5.3.1.2, *Existing Conditions*, although the Sutter Creek BSA is in sections of essential habitat connectivity areas mapped by CDFW, the BSA does not have the potential to function as a wildlife corridor or wildlife movement area due to its developed nature. Therefore, the construction and operation of the proposed project at Sutter Creek HS would result in a **less than significant impact** to wildlife movement.

The CNDDB and the site reconnaissance visit on June 23, 2023, determined there were no recorded nursery sites. Additionally, the biological resource assessment determined the campus is not a suitable habitat for special status birds or bats to nest or roost on-site. Therefore, impacts would be **less than significant**.

Level of Significance Before Mitigation: Potentially significant.

Impact 5.3-5: The proposed project would not compliance with local policies or ordinances protecting biological resources. [Thresholds B-5]

Argonaut High School Site Improvements

The construction of the site improvements at Argonaut HS may result in tree removals along the public right-of-way on Stony Creek Road for the construction of the proposed driveway. Tree removals outside of District property would be required to comply with the City's Municipal Code, Section 17.40.120, Criteria for Tree Removal. Section 17.40.120, which requires that the removal of trees that have a diameter of eight inches or greater on city property (e.g. along the public right-of-way) be reviewed and approved by the Jackson Planning Commission. All trees that have a diameter greater than 16 inches at breast height shall be removed and replaced at a ratio of 3 to 1. Oak trees need to be replaced with like species. Development of the proposed project would be required to comply with all applicable state and local laws and regulations governing the protection

and preservation of biological resources, including trees. The District would be required to obtain tree removal permits from the City of Jackson for all trees removals within the public right of way. Compliance with Section 17.40.120 of the Jackson Municipal Code would ensure that the proposed project would not conflict with a local policy protecting biological resources, and a **less than significant impact** would occur.

Ione Junior High School Site Improvements

Development of the site improvements at Ione Junior HS would occur entirely within Ione Junior HS campus. As such, the site improvements and associated tree removals would not be subject to the City of Ione Municipal Code Section 8.20. Development of the proposed project would be required to comply with all applicable state laws and regulations governing the protection and preservation of biological resources, including trees. The proposed project would not conflict with local policies or ordinances protecting biological resources, and **a less than significant impact** would occur.

Sutter Creek Elementary School Site Improvements

Development of the site improvements at Sutter Creek ES would occur entirely within the campus. The site improvements to construct the proposed building may require tree removals. Development within district property is not subject to the City of Sutter Creek Municipal Code Chapter 13.24.130. Development of the proposed project would be required to comply with all applicable state laws and regulations governing the protection and preservation of biological resources, including trees. The proposed project would not conflict with local policies or ordinances protecting biological resources, and **a less than significant impact** would occur.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.3-6: The proposed project would not compliance with an adopted NCCP/HCP protecting biological resources. [Thresholds B-6]

Argonaut High School Site Improvements

The Argonaut BSA is not in an NCCP/HCP area and therefore would not conflict with an adopted NCCP/HCP. The nearest NCCP/HCP to Argonaut HS is the Yolo County NCCP/HCP approximately 40 miles west of the campus (CDFW 2022). Therefore, the proposed project would not conflict with an adopted NCCP/HCP, and **no impact** would occur.

Ione Junior High School Site Improvements

The Ione Junior BSA is not in an NCCP/HCP area and therefore would not conflict with an adopted NCCP/HCP. The nearest NCCP/HCP to Ione Junior HS is the Yolo County NCCP/HCP approximately 30 miles west of the campus (CDFW 2022). Therefore, the proposed project would not conflict with an adopted NCCP/HCP, and **no impact** would occur.

Sutter Creek Elementary School Site Improvements

The Sutter Creek BSA is not in an NCCP/HCP area and therefore would not conflict with an adopted NCCP/HCP. The nearest NCCP/HCP to Sutter Creek is the Yolo County NCCP/HCP approximately 39 miles west of the campus (CDFW 2022). Therefore, the proposed project would not conflict with an adopted NCCP/HCP, and **no impact** would occur.

Level of Significance Before Mitigation: No impact.

5.3.4 Mitigation Measures

Impact 5.3-1

BIO-1 **Focused Special-Status Plant Survey.** Prior to any ground disturbing activities, a qualified biologist obtained by Amador County USD shall perform special-status plant surveys of all three BSAs according to CDFW, CNPS, and USFWS protocols (California Department of Fish and Game 2009; CNPS 2014; USFWS 1996). Surveys shall be conducted throughout all suitable habitat within the project footprints and a 50-foot buffer to address potential direct and indirect impacts of the project. Surveys shall be conducted by a qualified biologist and timed according to the identifiable period for target species (typically the blooming period). To the extent feasible, known reference populations will be visited prior to surveys to confirm target species are evident and identifiable at the time of the survey.

If no special-status plants are found, no further measures pertaining to special-status plants are necessary.

If special-status plants are identified within a BSA, the project shall be modified to the extent feasible to prevent disturbance or loss of special-status plants. Environmentally Sensitive Areas shall be established around sensitive plant populations in or adjacent to the BSA. Environmentally Sensitive Areas shall have a 50-foot buffer unless otherwise determined by a qualified biologist in coordination with the appropriate resource agency. Buffer distances may vary between species depending on listing status, rarity, and other factors. Environmentally Sensitive Areas will be clearly demarcated in the field, and no construction or ground-disturbing activities will occur within the boundaries of the delineated area.

If special-status plant species are found and avoidance is not feasible, additional measures may be developed in consultation with CDFW, USFWS, and/or the Amador County USD. These measures may include restoration or permanent preservation of habitat for special-status plant species or translocation (via seed collection and/or transplantation) from planned impact areas to unaffected suitable habitat.

If a state or federally listed threatened or endangered plant or a plant that is a candidate for state listing is found within a BSA, the applicant shall consult with CDFW and/or USFWS, as

applicable, to determine appropriate avoidance and minimization measures. If the plants cannot be avoided, an incidental take permit and compensatory mitigation may be required.

BIO-2 **Pre-construction Nesting Bird Survey.** Prior to any ground disturbing activities, a qualified biologist obtained by Amador County USD shall conduct a pre-construction nesting bird survey of all suitable habitats within and adjacent to the BSAs within 14 days prior to the commencement of construction during the nesting season (February 1 to August 31). The survey shall be conducted within a 300-foot radius of project work areas for nesting raptors and a 100-foot radius for passerines. If active nests are found, a no-disturbance buffer shall be established around the nest. The buffer distance shall be established by a qualified biologist. The buffer shall be maintained until the fledglings are capable of flight and become independent of the nest tree, to be determined by a qualified biologist. Once the young are independent of the nest, the buffer shall be removed.

BIO-3 **Special-Status Bats Roosting Survey and Habitat Assessment.** Prior to any ground disturbing activities, a qualified biologist obtained by Amador County USD shall perform a focused bat roost survey and habitat assessment for Argonaut and Ione BSAs. The initial survey shall be conducted as early in the planning process as possible, to allow for avoidance of project-related impacts during critical periods of the bat's life cycle. During the survey, potential roost sites shall be evaluated and inspected for presence or sign of roosting bats. Surveys may be aided by the use of night-vision goggles or acoustic equipment to determine if roosting bats are present and to help aid in species identification.

If use of the Argonaut and/or Ione BSAs by roosting bats is confirmed, identified bat roosting sites shall be avoided and protected in place to the extent feasible. A buffer area shall be established around the roost site to minimize disturbance of roosting bats. The size of the buffer area will depend on the species and type of roost present (e.g., maternity roost, day roost, hibernacula), and will be determined in consultation with CDFW.

If avoidance is not possible, and a tree or structure with bat roosting habitat must be removed, the applicant shall consult with CDFW regarding appropriate avoidance and mitigation measures. Measures may include restrictions on timing or methods of roost removal to avoid potential injury or death of individual bats, as well as replacement of removed bat habitat features.

In general, removal of bat roost sites shall be timed to occur outside of the maternity roosting season (generally April 1 to August 31) and only when nighttime low temperature are above 45°F and rainfall is less than 0.5 inch in 24 hours. If a maternity colony is present, it shall remain undisturbed until the young are volant (able to fly) and the colony has dispersed, as confirmed by a qualified bat biologist.

Where feasible, bat exclusion devices or one-way doors may be used to exclude bats from roost sites prior to removal.

Trees with identified bat roosting habitat shall be removed using a two-phase removal process conducted over two consecutive days. On the first day, tree limbs and branches will be removed, using chainsaws only. Removal will avoid limbs with cavities, cracks, crevices, or deep bark fissures. On the second day, the entire tree will be removed.

Standing dead trees or snags with habitat features should be removed over a single day by gently lowering the tree or snag to the ground. The tree or snag shall be left undisturbed onsite for the next 48 hours.

Removal and trimming of trees with potential roosting habitat shall be conducted in the presence of a biological monitor.

Impact 5.3-4

Mitigation Measures BIO-2 and BIO-3 above.

5.3.5 Level of Significance After Mitigation

Impacts 5.3-2, -3, -5, and -6, were determined to have no impact or a less than significant impact and do not require mitigation. With the incorporation of Mitigation Measure BIO-1 through BIO-3 and adherence to regulatory compliance measures, Impact 5.3-1 and Impact 5.3-4 would be reduced to a less than significant level.

5.3.6 Cumulative Impacts

Implementation of proposed project, inclusive of the mitigation measures, would result in a negligible impact on biological resources of the region. The BSAs largely occur in disturbed/developed with vegetation types that are not sensitive habitat. Other projects in the area would be required to prepare biological resources assessment and determine appropriate mitigation measures for their sites. Similar to the proposed project, each project would be reviewed on a case-by-case basis for its impact on biological resources and would be expected to comply with existing regulations and local and regional plans, ordinances, and policies protecting biological resources. Additionally, similar to the proposed project, each project would be expected to implement mitigation measures, which would reduce each project's impact. With mitigation implementation, the biological effects of the proposed project and other projects of the region are expected to be relatively minor and would be considered cumulatively less than significant.

5.3.7 References

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5.4 CULTURAL RESOURCES

Cultural resources comprise archaeological and historical resources. A cultural resource is defined as any object or specific location of past human activity, occupation, or use, identifiable through historical documentation, inventory, or oral evidence. Cultural resources provide information on scientific progress, environmental adaptations, group ideology, or other human advancements. Cultural resources can be separated into three categories: archaeological, built environment, and tribal cultural resources.

Archaeology studies human artifacts, such as places, objects, and settlements that reflect group or individual religious, cultural, or everyday activities. Archaeological resources include both historic and prehistoric remains of human activity. Historic-period resources include historic structures, structural ruins (such as foundation remnants), sites (such as artifact reuse deposits and artifact-filled features), objects, or places that are significant for their engineering, architecture, cultural use, or association. Tribal cultural resources can include lithic artifact or ceramic scatters, quarries, habitation sites, temporary camps/rock rings, ceremonial sites, and monuments, canals, historic roads and trails, bridges, and ditches and objects. Archaeological resources and built environment resources are discussed in this chapter. Tribal cultural resources are discussed in Chapter 5.15, *Tribal Cultural Resources*.

As discussed in Chapter 5.00, this section of the Draft Environmental Impact Report (DEIR) evaluates the proposed project, specifically the site improvements at Sutter Creek ES, Argonaut HS, and Ione Junior HS (see Chapter 3, *Project Description*).

The information and analysis in this section is based in part on the Archaeological Resources and Architectural History Inventory and Evaluation Report prepared for the proposed project by ECORP Consulting and dated November 2023. A copy of this report is provided as Appendix D.

5.4.1 Environmental Setting

5.4.1.1 REGULATORY BACKGROUND

Federal

National Historic Preservation Act

The National Historic Preservation Act of 1966 coordinates public and private efforts to identify, evaluate, and protect the nation's historic and archaeological resources. The act authorized the National Register of Historic Places, which lists districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Section 106 (Protection of Historic Properties) of the act requires federal agencies to take into account the effects of their undertakings on historic properties. Section 106 Review ensures that historic properties are considered during federal project planning and implementation. The Advisory Council on Historic Preservation, an independent federal agency, administers the review process with assistance from state historic preservation offices.

National Register of Historic Places

The National Register of Historic Places (NRHR) is the nation's master inventory of known historic resources. Established under the auspices of the National Historic Preservation Act of 1966, the National Register is administered by the National Park Service and includes buildings, structures, sites, objects, and districts that possess historic, architectural, engineering, archaeological, or cultural significance at the national, state, or local level. Eligibility for the National Register is addressed in National Register Bulletin 15, "How to Apply the National Register Criteria for Evaluation." Bulletin 15 states that in order to be eligible for the National Register, a resource must both: (1) be historically significant, and (2) retain sufficient integrity to adequately convey its significance.

Significance is assessed by evaluating a resource against established eligibility criteria. A resource is considered significant if it satisfies any one of the following four National Register criteria:

- Criterion A (events): associated with events that have made a significant contribution to the broad patterns of our history.
- Criterion B (persons): associated with the lives of significant persons in our past.
- Criterion C (architecture): embodies the distinctive characteristics of a type, period, or method of construction, or that represents the work of a master, or that possesses high artistic values, or that represents a significant and distinguishable entity whose components may lack individual distinction.
- Criterion D (information potential): has yielded or may be likely to yield, information important in prehistory or history.

In addition, the resource must be at least 50 years old, barring exceptional circumstances. Resources that are eligible for or listed on the NRHP are historic properties.

After significance has been established, it must be demonstrated that a resource retains enough of its physical and associative qualities—or integrity—to convey the reason(s) for its significance. Integrity is best described as a resource's "authenticity" as expressed through its physical features and extant characteristics. Generally, if a resource is recognizable as authentic in its present state, it is said to retain integrity, but if it has been extensively altered then it does not. Whether a resource retains sufficient integrity for listing is determined by evaluating the seven aspects of integrity defined by the National Park Service:

- **Location**. The place where the historic property was constructed or where the historic event happened.
- **Setting**. The physical environment of a historic property.
- **Design**. The combination of elements that create the form, plan, space, structure, and style of a property.
- **Materials**. The physical elements that were combined or deposited during a particular period of time and in a particular manner or configuration to form a historic property.
- **Workmanship**. The physical evidence of the crafts of a particular culture or people during any given period in history or prehistory.
- **Feeling**. A property's expression of the aesthetic or historic sense of a particular period of time.
- **Association**. The direct link between an important historic event/person and a historic property.

Integrity is evaluated by weighing all seven of these aspects together and is ultimately a "yes or no" determination—that is, a resource either retains sufficient integrity or it does not. Some aspects of integrity may be weighed more heavily than others depending on the type of resource being evaluated and the reason(s) for the resource's significance. Since integrity depends on a resource's placement within a historic context, integrity can be assessed only after it has been concluded that the resource is in fact significant.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act of 1979 regulates the protection of archaeological resources and sites on federal and Indian lands.

State

The California Office of Historic Preservation, a division of the California Department of Parks and Recreation, is responsible for carrying out the duties described in the Public Resources Code (PRC) and maintaining the California Historic Resources Inventory and the California Register of Historical Resources (CRHR). The state-level regulatory framework also includes CEQA, which requires the identification and mitigation of substantial adverse impacts that may affect the significance of eligible historical and archaeological resources.

California Environmental Quality Act

A "historical resource" is a resource that 1) is listed in or has been determined eligible for listing in the CRHR by the State Historical Resources Commission, or has been determined historically significant by the CEQA lead agency because it meets the eligibility criteria for the CRHR; 2) is included in a local register of historical resources, as defined in PRC 5020.1(k); or 3) has been identified as significant in a historical resources survey, as defined in PRC 5024.1(g) (California Code of Regulations [CCR] Title 14, Section 15064.5(a)).

The eligibility criteria for the CRHR are:

(1) It is associated with events that have made a significant contribution to the broad patterns of local or regional history, or the cultural heritage of California or the United States;

(2) It is associated with the lives of persons important to local, California, or national history;

(3) It embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of a master or possesses high artistic values; or

(4) It has yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation. (14 CCR Section 4852(b)).

In addition, the resource must retain integrity, which is evaluated with regard to the retention of location, design, setting, materials, workmanship, feeling, and association (14 CCR Section 4852(c)). Resources that have been determined eligible for the NRHP are automatically eligible for the CRHR.

Impacts to a historical resource, as defined by CEQA—i.e., listed in an official historic inventory or survey or eligible for the CRHR—are significant if the resource is demolished or destroyed or if the characteristics that made the resource eligible are materially impaired (14 CCR Section 15064.5(b)). Demolition or alteration of eligible buildings, structures, and features so that they would no longer be eligible would be a significant impact. Whole or partial destruction of eligible archaeological sites would be a significant impact. In addition to construction impacts resulting in destruction or physical alteration of an eligible resource, impacts to the integrity of setting (sometimes termed "visual" impacts) of physical features in the project area could also result in significant impacts.

California Public Resources Code

Archaeological, paleontological, and historical sites are protected under a wide variety of state policies and regulations in the PRC. In addition, cultural and paleontological resources are recognized as nonrenewable resources and receive protection under the PRC and CEQA.

PRC Sections 5020 to 5029.5 continued the former Historical Landmarks Advisory Committee as the State Historical Resources Commission. The commission oversees the administration of the CRHR and is responsible for designating State Historical Landmarks and Historical Points of Interest.

PRC Sections 5079 to 5079.65 define the functions and duties of the Office of Historic Preservation, which administers federal- and State-mandated historic preservation programs in California as well as the California Heritage Fund.

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites; identify the powers and duties of the Native American Heritage Commission (NAHC); require that descendants be notified when Native American human remains are discovered; and provide for treatment and disposition of human remains and associated grave goods.

Regional

Amador County General Plan

The Conservation Element of the Amador County General Plan includes the following goal and policy that relate to cultural resources:

- **Goal C-8:** Preserve the county's cultural resources.
- **Policy C-8.3:** Educate local realtors, property owners, and developers regarding the need to protect and preserve cultural resources, with the objective of increasing cultural resource awareness among existing and new property owners.

Local

Jackson General Plan

The Land Use Element of the Jackson General Plan contains one policy related to cultural resources (Jackson 2008).

- **Policy 2.6**: A cultural resources study shall be performed for the purpose of outlining areas considered to be historically and culturally sensitive and creating a Cultural/Historic Overlay to be incorporated into this Land Use Element. New development standards for properties within this overlay shall be developed to protect the City's historic and cultural features.

Currently, the City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals, policies, and actions related to cultural resources are outlined here (Jackson 2023).

- **Goal COS-4**: Preserve historical, architectural, cultural, and tribal resources in order to bolster community heritage and protect significant resources for future generations.
- **Policy COS 4.1:** Recognize significant historical resources and use these resources to promote a sense of place and history in Jackson. Seek to incorporate reminders of Jackson's culture in the built and natural environment through adaptive reuse, signage, markers, and other reminders of Jackson's heritage.
- **Policy COS 4.2:** Evaluate the condition of historical buildings, the costs of rehabilitation, and the feasibility of preservation or conservation alternatives when considering the demolition of historical structures. As feasible, encourage the adaptive reuse of the historical structure.
- **Policy COS 4.4:** Protect areas containing significant historical, archaeological, and paleontological resources, as defined by the California Public Resources Code
- **Policy COS 4.5:** If found during construction, ensure that human remains are treated with sensitivity and dignity, and ensure compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.
- **Policy COS 4.6**: Work with Native American representatives to identify and appropriately address, through avoidance or mitigation, impacts to Native American cultural resources and sacred sites during the development review process.
- **Policy COS 4.7**: Consistent with state, local, and tribal intergovernmental consultation requirements such as SB 18 and AB 52, consult as necessary with Native American tribes that may be interested in proposed new development projects and land use policy changes.
- **Policy LU 2.2**: Promote high-quality design and site planning that is compatible with surrounding development, public spaces, and natural and historical resources.

Ione General Plan

The Conservation and Open Space Element of the Ione General Plan contains one policy related to cultural resources (Ione 2009).

- **Policy CO-9.3:** Where land designated or proposed to be designated for parks or open space contains Native American, historical, cultural and sacred sites, the City shall consult with the tribe as to the level of confidentiality required to protect the site and as to appropriate dignity to afford the site in any management plan.

Sutter Creek General Plan

The Sutter Creek General Plan Historic Element has one objective and two policies related to cultural resources (Sutter Creek 2019).

- **Objective H-1.1:** The preservation of the historic character of the city through preservation and enhancement of historic structures, sites and districts, and archeological resources.
- **Policy H-1.1.3:** The North Central Information Center at Sacramento State University and qualified historians or individuals knowledgeable about the City's history shall be offered adequate information and time to review and comment upon major development proposal that has a potential to affect known or unknown cultural or historical resources. (The North Central Information Center is a regional clearinghouse regarding archaeological information and requirements.)
- **Policy H-1.1.4:** Development projects shall notify the City and relevant parties if historic or prehistoric occupancy or use of the site is discovered during grading or building activities.

5.4.1.2 EXISTING CONDITIONS

Project Areas at Argonaut High School, Ione Junior High School, and Sutter Creek Elementary School

The Archaeological Resources and Architectural History Inventory and Evaluation Report for the proposed project identified project areas on the Argonaut HS, Ione Junior HS, and Sutter Creek ES campuses for purposes of archaeological resources and architectural history.

"Archaeology project areas" and "architectural history project areas" are defined for the three campuses. Each archaeology project area consists of locations within the campus that require ground disturbance. The Sutter Creek ES campus has a single archaeology project area. The Ione Junior HS campus has two noncontiguous archaeology project areas. Argonaut HS has five discontinuous archaeology project areas. Each architectural history project area consists of the school's entire campus, except Argonaut HS (see below).

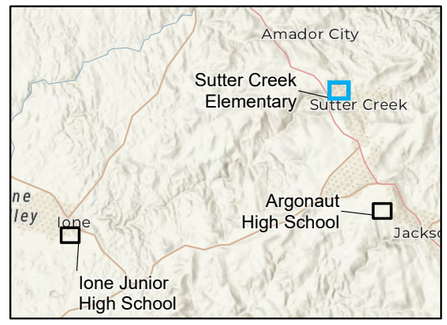
Figure 5.4-1, *Sutter Creek Elementary: Project Areas*, Figure 5.4-2, *Argonaut High School: Project Areas, and* Figure 5.4-3, *Ione Junior Elementary School: Project Areas,* map the archaeological and architectural history project areas for Sutter Creek ES, Argonaut HS, and Ione Junior HS, respectively.

Figure 5.4-1 - Sutter Creek Elementary: Project Areas

Sutter Creek Elementary

Archaeology Project Area - 0.84 ac.

Architectural History Project Area - 3.28 ac.



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Scale (Feet)

Source: ECORP Consulting, Inc 2023.

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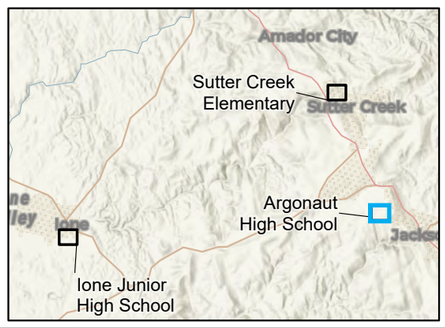
Figure 5.4-2 - Argonaut High School: Project Areas

Argonaut High School

Archaeology Project Area - 1.28 ac.



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Source: ECORP Consulting, Inc 2023.

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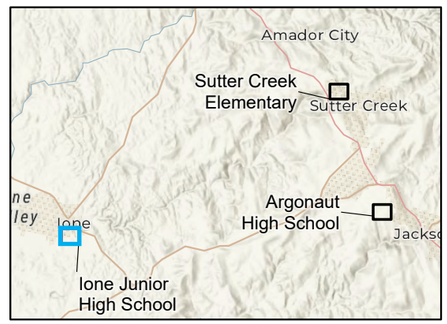
Figure 5.4-3 - Ione Junior High School: Project Areas

Ione Junior High School

Archaeology Project Area - 0.46 ac.

Architectural History Project Area - 12.58 ac.



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Source: ECORP Consulting, Inc 2023.

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Current Setting

Argonaut HS, Ione Junior HS, and Sutter Creek ES are on the western slopes of the lower Sierra Nevada Geomorphic Province of California. The Sierra Nevada is characterized by its high rugged eastern face, gentle western slopes, and high crest modified by glacial sculpting.

Soils data indicate a variable potential for buried, precontact archaeological resources in certain areas of the project sites. Amphibolite schist soils at the Sutter Creek ES and Argonaut HS locations indicate a late Cretaceous deposition, which predates humans and therefore has a relatively low potential for any preserved subsurface archaeological material. Ione Junior HS is adjacent to an unnamed historical creek bed. Together with the presence of alluvium and the likelihood of precontact archaeological sites along perennial and recurring waterways, the potential for previously unknown precontact resources buried at Ione Junior HS is moderate to high.

Argonaut High School

The project site is developed with the existing Argonaut HS facilities, and the proposed project would develop portions of the undisturbed land on-campus. Argonaut HS has five discontinuous (separate) archaeology project areas that total 1.28 acres in Section 20 of Township 6 North, Range 11 East. The Argonaut HS campus was constructed in 1983 and does not meet the age threshold of over 50 years to be considered an historical resource; therefore, it does not have an architectural history project area.

Ione Junior High School

The project site is developed with the existing Ione Junior HS facilities. Ione Junior HS has two separate archaeology project areas that total 0.46 acre, and the campuswide architectural history project area is 12.58 acres. The project site is in an unsectioned portion of the Arroyo Seco Land Grant.

Sutter Creek Elementary School

The project site is fully developed with the existing Sutter Creek ES facilities. Sutter Creek ES has a single archaeology project area of approximately one acre, encompassed by the campuswide architectural history project area of 12.37 acres, in Section 6 of Township 6 North, Range 11 East.

Historical Context

Ethnographic Setting

Prior to the arrival of European-Americans in the region, indigenous groups speaking more than 100 different languages and occupying a variety of ecological settings inhabited California. Multiple studies recognized the uniqueness of California's indigenous groups and classified them as belonging to the California culture area. California gets further subdivided into four subculture areas: Northwestern, Northeastern, Southern, and Central.

When the first European explorers entered the region between 1772 and 1821, an estimated 100,000 people, about one-third of the state's native population, lived in the Central Valley. At least seven distinct languages of Penutian stock were spoken among these populations: Wintu, Nomlaki, Konkow, River Patwin, Nisenan,

Miwok, and Yokuts. Common linguistic roots and similar cultural and technological characteristics indicate that these groups shared a long history of interaction. The Southern area encompasses the archaeology project areas and includes the Foothill Yokuts. The archaeology project areas are situated in the traditionally recognized territory of the Penutian-speaking Sierra Miwok.

At the time of contact, the Miwok were one of the largest groups in California, occupying vast stretches of land that extended from the Sierra Nevada, across the Great Valley, and into portions of the North Coast above San Francisco. The Miwok people have been divided by anthropologists into four regional groups: the Bay Miwok, Coast Miwok, Plains Miwok, and Sierra Miwok. The Sierra Miwok are further identified by three subgroups, the Northern Sierra Miwok, Central Sierra Miwok, and Southern Sierra Miwok. The Northern Sierra Miwok occupied the "the foothill and mountain portions of the Stanislaus and Tuolumne drainages" (ECORP 2023). The Central Sierra Miwok occupied the foothill region south of the Cosumnes River to the upper drainages of the Chowchilla and Merced Rivers. The Southern Sierra Miwok occupied the upper drainages of the Merced and Chowchilla rivers. The archaeology project areas are in the territory of the Northern Sierra Miwok.

Miwok settlement and subsistence patterns were coordinated with the seasonal ripening of plant foods and the movements and migration of game animals. Valley flooding may have prompted certain species, such as elk, antelope, and bears, to migrate to higher ground in the lower valley foothill belt of the Sierra. Anadromous fish, such as steelhead and salmon, migrated up the main rivers and tributaries.

The primary political unit was the "tribelet," with between 100 and 300 people. Each tribelet was an independent sociopolitical organization with territorial boundaries associated with the control of natural resources. Each tribelet had a few permanent settlements (villages) and several seasonal campsites.

The typical mountain dwelling was the conical bark house. Semisubterranean earth roundhouses were constructed for ceremonial purposes. After the death of a chief, the roundhouse would be burned as part of the Miwok mourning ceremony.

Sierra Miwok used bows and arrows as their primary weapon for hunting and warfare. They made their bows from ash, oak, willow, pepperwood, maple, or hazel. Flaked and ground stone tools included knives, arrow and spear points, arrow straighteners, scrapers, rough cobble pestles and shaped pestles, and bedrock mortars. Nonutilitarian artifacts included pipes and charmstones. Obsidian was highly valued as a raw material for stone tools.

Sierra Miwok groups moved with the seasons to obtain resources within their territory. The most important subsistence resources were acorns (preferably from tan oak and black oak), seeds, nuts (nuts from grey pine were prized) and other plant resources, deer, antelope, rabbits, and fish.

Trade with groups on the eastern side of the Sierras was important. The Sierra Miwok exchanged grass seeds, fish, and shell beads (obtained from the coast) for obsidian, tobacco, pottery, and clay pipes (ECORP 2023).

Refer to the Archaeological Resources and Architectural History Inventory and Evaluation Report for a detailed description of the regional and local pre-Contact history (Appendix D).

Amador County History

José María Amador, the descendent of a prominent *californio* family, discovered gold along a foothill stream between the Cosumnes and Mokelumne rivers in 1848. The stream became known as Amador Creek and its nearby mining camp became Amador City. When the California Legislature divided Calaveras County along the Mokelumne River in 1854, all land north of the river became Amador County, with the mining camp of Jackson as its county seat. Other Gold Rush mining camps also survived as permanent towns, including Plymouth, Ione, and Sutter Creek. After the Gold Rush, logging, farming, and ranching joined gold mining as leading industries in Amador County. The Amador Branch Railroad, a Central Pacific Railroad subsidiary, built east from Galt and reached Ione in 1876. In 1904, the Ione & Eastern Railroad extended the Amador Branch from Ione to Martell, a town near Jackson. During the 1920s, California highway officials graded and paved a string of foothills wagon roads as the Mother Lode Highway (now State Route 49). In Amador County, the Mother Lode Highway linked the towns of Plymouth, Amador City, Sutter Creek, Martel, and Jackson with other foothills towns. Sand and gravel mining, winter sports, viticulture, and tourism became important industries during the 20th century (ECORP 2023).

For more information related to regional and California history refer to Appendix D.

Amador County School History

In 1858, Amador County's population of children between the ages of 4 and 18 numbered 1,377. The county had 12 school districts. Jackson School District, Amador County's largest district, employed two teachers; the other districts employed one teacher apiece. The average daily school attendance in Amador County was 383 students, less than one-third of the county's eligible school-age children. By 1871, 58 percent of school-age children actively attended school in Amador County. By then, the county had 28 school districts; all but 3 had well-maintained schoolhouses. The Ione Valley School District had a "comfortable school-house" that appeared "tolerably well supplied" and "quite flourishing." The Sutter Creek School District had a "magnificent two-story brick building" that accommodated 220 students (ECORP 2023).

Amador County's first high school, Ione Academy (later renamed Ione HS), a two-story wood-frame building, opened to students in 1903. When the Ione & Eastern Railroad began running trains to Martell in 1904, students from Sutter Creek, Martell, and Jackson enrolled in the Ione Academy and rode the train to and from school. By 1910, Amador County had 43 school districts, each with its own board of trustees and schoolhouses; 31 of the schools offered primary and grammar instruction, and 12 offered primary instruction only. High school districts in Jackson and Sutter Creek became organized in 1911. Jackson HS opened its doors to students in 1913. Amador County HS in Sutter Creek opened in 1914. Beginning in 1939, a major two-year building program at Ione HS added multiple new buildings to the school's original two-story building.

After 1950, Amador County's various school districts became consolidated into unified school districts. In 1951, 12 elementary schools in the Amador County HS District in northeastern Amador County became consolidated as the Oro Madre Unified School District headquartered in Sutter Creek. Elementary schools in the Jackson Union HS District followed suit in 1963 as the Jackson Unified School District, and schools in the vicinity of Ione became consolidated as the Ione Unified School District. In 1982, the Oro Madre, Jackson, and Ione unified school districts further consolidated into a single Amador County Unified School District. A year later,

Ione HS merged with Jackson HS, creating Argonaut HS in Jackson; the Ione HS campus became repurposed as Ione Junior HS.

In 1955, the Oro Madre Unified School District broke ground on a new Sutter Creek ES. It marked "the first project under way in a modernization program for the Oro Madre Unified School District" (ECORP 2023). The modernization program also called for new elementary schools at Plymouth and Pine Grove, a new junior high school at Sutter Creek, and a new cafeteria at Amador County HS in Sutter Creek. Construction problems delayed the completion of Sutter Creek ES until 1957 (ECORP 2023).

School Architecture, 1940 to 1960

School architecture after 1940 reflected the low-density, suburban preferences of many American homebuyers. Most young families favored "green and spacious" school settings in contrast to the "noisy and nuisance-ridden city streets" of early 20th-century urban schools. Architecturally, young families also rejected the "boxy plan and heavy masonry look" of older urban schools for more welcoming layouts "based on 'neighborhoods' of glass-fronted classroom wings" situated "around a series of open-air courtyards." School architecture after 1940 also reflected the mid-20th-century preference for Modernist architecture, a design movement that rejected tradition and embraced newness. Modernist schools, like other mid-20th-century public buildings, exhibited clean lines, flat surfaces, and simple geometric shapes. The influential Hillsdale HS, built in 1956 in San Mateo, California, employed a "modular plan and moveable panels to permit the reconfiguration of interior spaces to suit changing needs." Modernist architecture offered numerous advantages. "It stood for progress, it provided flexibility, and it was economical to build" (ECORP 2023).

Sutter Creek ES, Ione Junior HS, and Argonaut HS

The three campuses were originally open fields outside the town limits or adjacent to the town grid, with connections to the local economic export such as mining or railroad industries. The first roads near the three campuses were constructed as early as the late 1880s, but the commercial and residential boom began in the late 1950s.

ECORP surveyed the project areas for cultural resources on June 29, 2023. ECORP documented all buildings and built-environment resources on the individual campuses and inspected the archaeology project areas for archaeological materials using 15-meter transects. ECORP did not observe any historic-era or pre-contact archaeological materials during any of the pedestrian surveys.

No archaeological resources were identified; however, ECORP identified and recorded two built environment resources that exceed 50 years of age: Ione Junior HS, the former Ione HS campus; and Sutter Creek ES. ECORP evaluated these resources using the NRHP and CRHR eligibility criteria (ECORP 2023). Neither Ione Junior HS nor Sutter Creek ES are eligible for the NRHP or CRHR.

Ione Junior High School

Established in 1904 as a single, two-story building (no longer extant), Ione HS became enlarged after 1939 with the addition of multiple new buildings. The campus now includes 4 buildings that exceed 50 years of age and 13 buildings that do not exceed 50 years of age; the campus also includes 6 objects that exceed 50 years of age

and 3 objects that do not exceed 50 years of age. The objects include monuments, sign/planter box, bench, and water fountain.

Sutter Creek Elementary School

Sutter Creek ES (kindergarten through 6th grade) is a 1957 elementary school in Sutter Creek, California. The campus includes two buildings that exceed 50 years of age and nine buildings that do not exceed 50 years of age; the campus also includes two objects that do not exceed 50 years of age. The objects include drinking fountain and planter box, and a monument.

Refer to Appendix D for a description of the buildings and objects on-site.

Historic and Cultural Record Searches

Previous Research

A records search of the California Historical Resources Information System was requested by ECORP on June 8, 2023, at the North Central Information Center, California State University, Sacramento. The purpose of the records search was to determine the extent of previous surveys within a 0.5-mile (800-meter) radius of the project areas of each campus, and whether previously documented pre-contact or historic archaeological resources, architectural resources, or traditional cultural properties exist within these areas. Information Center staff completed and returned the records search to ECORP on June 13, 2023.

A total of 49 previous cultural resource investigations have been conducted within 0.5 mile of the project areas and have covered 20 to 40 percent of the records search radius. One study covered a portion of the Sutter Creek ES project area, and one covered a portion of the Amador HS project area. These studies revealed the presence of pre-contact resources, including bedrock mortar resources, and historical resources, including railroads, water conveyance systems, structures, rock walls, and resources associated with historic mining activities. The previous studies were conducted between 1975 and 2015.

The records search also determined that 48 previously recorded pre-contact and historic-period cultural resources are within 0.5 mile of the project areas. Of these, two are believed to be associated with Native American occupation of the vicinity, and 46 are historic-period resources associated with early European-American ranching and mining activities. There are no previously recorded cultural resources within the project areas.

Records Searches

The Office of Historic Preservation's Built Environment Resource Directory for Amador County (March 3, 2020) did not include any built environment resources within 0.5 mile of Argonaut HS project area. Four built environment resources are within 0.5 mile of Ione Junior HS project area: 330 Buena Vista Street, 311 Church Street, and 223 and 23 Main Street. Ten built environment resources are within 0.5 mile of Sutter Creek ES project area: 20 and 230 Badger Street; and 8, 21, 22, 25, 26, 29, 33, and 35 Spanish Street.

The National Register Information System did not reveal any eligible or listed properties in the project areas. No eligible or listed properties are in the Argonaut HS project area. The nearest NRHR property is Saint Sava Serbian Orthodox Church, approximately 1.6 mile southeast of the Argonaut HS project area. No eligible or listed properties are in the Ione Junior HS project area. The nearest NRHR-listed property is the Ione City Century Church, approximately 0.1 mile northeast of the Ione Junior HS project area. No eligible or listed properties are in the Sutter Creek ES project area. The nearest NRHR-listed property is Knight's Foundry and Shops approximately 0.6 mile northwest of the Sutter Creek ES project area.

ECORP reviewed resources listed by the Office of Historic Preservation as California Historical Landmarks on June 9, 2023. The nearest landmark to Argonaut HS is #34: Pioneer Hall, approximately 1.3 miles southeast of the Argonaut HS project area. The nearest landmark to Ione Junior HS is #506: The Community Methodist Church of Ione, approximately 0.1 mile northeast of the Ione Junior HS project area. The nearest landmark to Sutter Creek ES is #322: Sutter Creek, approximately 0.7 mile southeast of the Sutter Creek ES project area.

The City of Sutter Creek was originally named for John A. Sutter, who mined in the area during the summer of 1848. Quartz gold was discovered in 1851 and many mining businesses began in the area. Buildings and businesses from those days are still in operation today. The City of Jackson is the county seat of Amador and brick buildings from mining days line its streets. The city was named for Alden M. Jackson, a lawyer from New England. Though the town itself and surrounding immediate vicinity were not lucrative for gold, the location was a convenient stopping place between Sacramento and other nearby mines. Numerous mines in the vicinity produced rich deposits of gold. The City of Ione, a supply center rather than a gold town, eventually prospered as agriculture in California grew. Numerous buildings from the mid-1800s still exist and are used today. Many surrounding small towns were important for a while, but have since vanished.

The Caltrans Bridge Local and State Inventories listed two historic bridges within 0.5 mile of the project areas. Bridge number 26C0051 carries Badger Street over Sutter Creek approximately 0.3 mile southeast of Sutter Creek ES. State Bridge number 26-0005 carries Preston Avenue over Sutter Creek approximately 0.3 mile north of Ione Junior HS. Both bridges were found not eligible for inclusion in the NRHP (Category 5).

The nearest Native American village to the Sutter Creek ES is approximately 3,000 feet away. The nearest Native American village to Ione Junior HS is approximately 200 feet away. The nearest Native American village to Argonaut HS is approximately 6,000 feet away.

A search of the Sacred Lands File by the NAHC indicated the presence of Native American cultural resources in the project areas (ECORP 2023).

5.4.2 Thresholds of Significance

CEQA Guidelines Section 15064.5 provides direction on determining significance of impacts to archaeological and historical resources. Generally, a resource shall be considered "historically significant" if the resource meets the criteria for listing on the California Register of Historical Resources:

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

- Is associated the with lives of persons important in our past;
- 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; or
- Has yielded, or may be likely to yield, information important in prehistory or history. (PRC Section 5024.1; 14 CCR Section 4852)

The fact that a resource is not listed in the CRHR, not determined to be eligible for listing, or not included in a local register of historical resources does not preclude a lead agency from determining that it may be a historical resource.

According to Appendix G of the CEQA Guidelines, a project has the potential to impact a historical resource when the project results in a "substantial adverse change" to the resource's significance. Substantial adverse change is defined as "physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource will be materially impaired" (14 CCR Section 15064.5).

The significance of a historical resource is materially impaired when a project:

a) Demolishes or materially alters in an adverse manner those physical characteristics of an historical resources that convey its historical significance and that justify its inclusion in, or eligibility for, the California of Historical Resources; or

b) Demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources pursuant to section 5020.1(k) of the PRC of its identification in an historical resources survey meeting the requirements of section 5024.1(g) of the PRC, unless the public agency reviewing the effects of the project established by a preponderance of evidence that the resource is not historically or culturally significant; or

c) Demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for the purposes of CEQA.

A project that has been determined to conform with the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings is generally considered a project that will not cause a significant impact on a historical resource (14 CCR Section 15064.5(b)(3).

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

C-1 Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.

C-2 Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.

C-3 Disturb any human remains, including those interred outside of dedicated cemeteries.

Also see Section 5.6, *Geology and Soils*, regarding potential impacts to paleontological resources, and Section 5.16, *Tribal Cultural Resources*, regarding potential impacts to Native American cultural resources.

5.4.3 Environmental Impacts

5.4.3.1 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance; the applicable thresholds are identified in brackets after the impact statement.

Impact 5.4-1: The proposed project would not cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5.[Threshold C-1]

As discussed in Section 5.4.1.2, *Existing Conditions*, the Archaeological Resources and Architectural History Inventory and Evaluation Report identified two built environment resources that exceed 50 years of age: Ione Junior HS, the former Ione HS campus; and Sutter Creek ES. These resources were evaluated using the NRHP and CRHR eligibility criteria. The Report determined that neither Ione Junior HS nor Sutter Creek ES is eligible for the NRHP or CRHR.

Argonaut High School Site Improvements

As described in Section 5.4.1.2, *Existing Conditions*, the Argonaut HS' built environment does not exceed 50 years of age. Therefore, none of the buildings on the Argonaut HS campus meet the eligibility criteria for listing in the NRHP or CRHR. Therefore, the proposed project would not cause a change in significance of a historical resource, and the impact would be **less than significant.**

Level of Significance Before Mitigation: Less than significant.

Ione Junior High School Site Improvements

As stated in Section 5.4.1.2, *Existing Conditions*, a potential historic resource was identified at Ione Junior HS Ione Junior HS, the former Ione HS campus, shaped patterns of school development in Amador County as the county's first high school. During its period of significance (1904 to 1914), the school enrolled students from Ione as well as students from Sutter Creek, Martell, and Jackson, who rode Ione & Eastern Railroad trains to and from school. By demonstrating the value of high school education in Amador County, Ione Junior HS, the former Ione HS campus, meets the criteria for eligibility under NRHP/CRHR Criterion A/1.

Generations of students, teachers, and staff made Ione Junior HS their school and workplace. However, there is nothing in the archival record to suggest the school is associated with the lives of persons significant in Amador County's past. It does not meet the criteria for eligibility under NRHP/CRHR Criterion B/2.

Designed by unknown architects, Ione Junior HS has a nondistinctive, 20th-century school layout that is absent of character-defining features and does not embody the distinctive characteristics of a type, period, or method of construction; or represent the work of a master; or possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction. Therefore, the school does not meet the criteria for eligibility under NRHP/CRHR Criterion C/3.

Three of Ione Junior HS's built environment features may exhibit character-defining features and possess individual eligibility—I-07, Band Building, built in 1941; I-09, Classroom Building, built in 1939; and I-04, Dedication Monument, built in 1939. However, none of these buildings would be removed as part of the proposed project.

The information potential of Ione Junior HS is expressed in its built form and in the historical record. The Archaeological Resources and Architectural History Inventory and Evaluation Report determined that the Ione Junior HS has not yielded nor is likely to yield information important in history or prehistory. It does not meet the criteria for eligibility under NRHP/CRHR Criterion D/4.

The Archaeological Resources and Architectural History Inventory and Evaluation Report evaluated the resource using the NRHP and CRHR eligibility criteria and found that Ione Junior HS is not eligible for the NRHP nor CRHR listing as the school does not possess integrity of materials, design, workmanship, feeling, and association, and does not retain its original 1904 building. Therefore, the proposed project would not cause a change in significance of a historical resource at Ione Junior HS, and the impact would be **less than significant**.

Level of Significance Before Mitigation: Less than significant.

Sutter Creek Elementary School Site Improvements

Sutter Creek ES marked "the first project under way in a modernization program for the Oro Madre Unified School District." (ECORP 2023). The modernization program also called for new elementary schools at Plymouth and Pine Grove, a new junior high school at Sutter Creek, and a new cafeteria at Amador County HS in Sutter Creek. Though it represented a part of a local school modernization program, Sutter Creek ES did not, on its own, shape patterns of school development in the Oro Madre Unified School District. There is nothing in the archival record that suggests the school is associated with events that have made a significant contribution to the broad patterns of Amador County history. It does not meet the criteria for eligibility under NRHP/CRHR Criterion A/1.

Generations of students, teachers, and staff made Sutter Creek ES their school and workplace. However, there is nothing in the archival record to suggest the school is associated with the lives of persons significant in Amador County's past. It does not meet the criteria for eligibility under NRHP/CRHR Criterion B/2.

Designed by unknown Oro Madre Unified School District architects, Sutter Creek ES has a nondistinctive, mid-20th-century Modernist design that is absent of any character defining features and does not embody the distinctive characteristics of a type, period, or method of construction; or represent the work of a master; or possesses high artistic values; or represent a significant and distinguishable entity whose components may lack

individual distinction. Therefore, the school does not meet the criteria for eligibility under NRHP/CRHR Criterion C/3.

The information potential of Sutter Creek ES is expressed in its built form and in the historical record. It has not yielded nor is likely to yield information important in history or prehistory. It does not meet the criteria for eligibility under NRHP/CRHR Criterion D/4.

Sutter Creek ES possesses integrity of location, setting, materials, workmanship, feeling, and association. It remains in its original location on the northern side of Amador HS in Sutter Creek. It retains its 1957 and 1966 Modernist classroom buildings. Sutter Creek ES still conveys the overall aesthetic of a 1957 elementary school that contributed to a larger modernization program for the Oro Madre Unified School District in Amador County. Sutter Creek ES does not possess integrity of design: several relocatable buildings and storage buildings that are less than 50 years old and in the immediate vicinity of the 1957 and 1966 classroom buildings have altered the school's layout. This, however, is not enough to compromise the school's overall integrity.

The Archaeological Resources and Architectural History Inventory and Evaluation Report determined that regardless of integrity, Sutter Creek ES does not meet any of the eligibility criteria for inclusion in the NRHP or CRHR as an individual resource due to lack of significance; it also does not contribute to any known or possible historic district.

The Archaeological Resources and Architectural History Inventory and Evaluation Report evaluated the resource using the NRHP and CRHR eligibility criteria and found that Sutter Creek ES is not eligible for the NRHP nor CRHR listing. Therefore, the proposed project would not cause a change in significance of a historical resource at Sutter Creek ES, and the impact would be **less than significant**.

Level of Significance Before Mitigation: Less than significant.

Impact 5.4-2: Development of the proposed project could cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5. [Threshold C-2]

Argonaut High School Site Improvements

Argonaut HS contains Auburn-Argonaut very rocky silt loams that are from the late-Cretaceous deposition, which predates humans. It therefore has a relatively low potential for any preserved subsurface archaeological material.

Although no known archaeological resources have been recorded at the campus, ground-disturbing construction activities (e.g., site preparation, grading, excavation, and trenching for utilities) associated with the proposed project may result in unanticipated discoveries of archaeological resources or the damage or destruction of such resources. Therefore, earth-disturbing activities conducted for the proposed project would have the potential to expose previously undiscovered subsurface archaeological resources. For this reason, the proposed project would result in a **potentially significant impact** to archaeological resources.

Level of Significance Before Mitigation: Potentially significant.

Ione Junior High School Site Improvements

Ione Junior HS contains Red Bluff-Mokelumne complex and Mokelumne soils and the presence of alluvium. Therefore, the potential for previously unknown pre-contact resources buried at the Ione Junior HS is moderate to high.

Although no known archaeological resources have been recorded at the campus, ground-disturbing construction activities (e.g., site preparation, grading, excavation, and trenching for utilities) associated with the proposed project may result in unanticipated discoveries of archaeological resources or the damage or destruction of such resources. Therefore, earth-disturbing activities conducted for the construction of the proposed project would have the potential to expose previously undiscovered subsurface archaeological resources. For this reason, the proposed project would result in a **potentially significant impact** to archaeological resources.

Level of Significance Before Mitigation: Potentially significant.

Sutter Creek Elementary School Site Improvements

Sutter Creek ES contains Auburn very rocky silt loam from the late-Cretaceous deposition, which predates humans. It therefore has a relatively low potential for any preserved subsurface archaeological material.

Although no known archaeological resources have been recorded at the campus, ground-disturbing construction activities (e.g., site preparation, grading, excavation, and trenching for utilities) associated with the proposed project may result in unanticipated discoveries of archaeological resources or the damage or destruction of such resources. Therefore, earth-disturbing activities conducted for the proposed project would have the potential to expose previously undiscovered subsurface archaeological resources. For this reason, the proposed project would result in a **potentially significant impact** to archaeological resources.

Level of Significance Before Mitigation: Potentially significant.

Impact 5.4-3: Grading activities could potentially disturb human remains. [Threshold C-3]

Argonaut HS, Ione Junior HS, and Sutter Creek ES are developed school campuses that previously required earthwork activities to construct the existing school facilities. The campuses would be considered disturbed land, and the potential for human remains would be low. However, earthwork activities of the proposed project, such as grading, may have the potential to unearth human remains. In the event that human remains are discovered, California Health and Safety Code Section 7050.5 and CEQA Guidelines Section 15064.5(e) require that there be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent human remains. These regulations require the coroner to make a determination as to whether an investigation into the cause of death is required. If the coroner has reason to believe the remains are Native American, they must contact the NAHC by telephone within 24 hours. The NAHC will identify the most likely descendant, who can make recommendations for proper treatment and burial, which would be implemented in accordance with Section 15064.5(e) of the CEQA Guidelines. Since project construction and earthwork

activities could discover unknown human remains, the proposed project would have a ***potentially significant impact***.

Level of Significance Before Mitigation: Potentially significant.

5.4.4 Mitigation Measure

Refer to Mitigation Measure TCR-1 in Chapter 5.16, *Tribal Cultural Resources*.

5.4.5 Level of Significant After Mitigation

With the incorporation of Mitigation Measure TCR-1, impacts related to the accidental discovery of archaeological resources and human remains would be less than significant.

5.4.6 Cumulative Impacts

While implementation of the proposed project in conjunction with the cumulative projects could unearth unknown significant cultural resources, in such an event each cumulative project would be required to comply with applicable regulatory requirements.

In addition, the proposed project does not involve demolition of a historic resource. It is possible that cumulative projects could involve modifications to or demolition of existing buildings, some of which may be considered historic resources. However, under existing applicable law, site-specific cultural resources investigations would be required for other discretionary projects before ground disturbances or demolition or substantial alteration of existing structures. Such investigations would include some degree of surface-level surveying and identify resources on the affected project sites. Such investigations would also be required to mitigate impacts (where needed) to protect and preserve any identified cultural and/or historic resources. As a part of the investigations, a cultural resources records search of the California Historical Resources Information System and a Sacred Land Files search would be required.

The proposed project would incorporate Mitigation Measure TCR-1, which would ensure that any buried archaeological resources and/or human remains, if encountered, would be properly handled. Additionally, existing federal, State, and local regulations and policies described in Section 5.4.1.1 protect any undiscovered cultural resources. Similarly, cumulative projects would be expected to implement applicable mitigation measures to reduce potential impacts and adhere to applicable regulations governing the treatment of cultural resources.

Therefore, the proposed project would not alter historic resources, archaeological resources, nor human remains in a manner that could combine with cumulative project to result in a cumulatively considerable impact to historic resources. The proposed project's contribution to cumulative cultural resource impacts would be rendered less than significant, and therefore, the proposed project's impacts would not be cumulatively considerable.

5.4.7 References

ECORP Consulting (ECORP). 2023, November. Archaeological Resources and Architectural History Inventory and Evaluation Report for the Amador County Unified School District Project. [Included as Appendix D]

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5. Environmental Analysis
CULTURAL RESOURCES

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5.5 ENERGY

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for energy-related impacts associated with the proposed project and ways in which it would reduce unnecessary energy consumption, consistent with the suggestions in Appendix F of the CEQA Guidelines.

5.5.1 Environmental Setting

Section 21100(b)(3) of the CEQA requires that an EIR include a detailed statement setting for the mitigation measures proposed to minimize significant effects on the environment, including but not limited to, measures to reduce the wasteful, inefficient, and unnecessary consumption of energy. Appendix F of State CEQA Guidelines states that, to ensure that energy implications are considered in project decisions, the potential energy implications of a project shall be considered in an EIR to the extent relevant and applicable to the project. Appendix F further states that a project's energy consumption and proposed conservation measures may be addressed, as relevant and applicable, in the project description, environmental setting, and impact analysis portions of technical sections, as well as through mitigation measures and alternatives.

In accordance with Appendices F and G of the State CEQA Guidelines, this EIR includes relevant information and analyses that address energy use by the proposed project. This section summarizes the proposed project's energy needs, impacts, and conservation measures. Some of the information in this section as well as related aspects of the proposed project's energy use are discussed in greater detail elsewhere in this EIR, including Section 5.2, *Air Quality*; 5.7, *Greenhouse Gas Emissions*; and 5.15, *Transportation*.

5.5.1.1 REGULATORY BACKGROUND

This section summarizes key federal, State, and regional regulations related to energy use and conservation.

Federal

Federal Energy Policy and Conservation Act

The Energy Policy and Conservation Act of 1975 was established in response to the 1973 oil crisis. The act created the Strategic Petroleum Reserve, established vehicle fuel economy standards, and prohibited the export of United States crude oil (with a few limited exceptions). It also created Corporate Average Fuel Economy (CAFE) standards for passenger cars starting in model year 1978. The CAFE standards are updated periodically to account for changes in vehicle technologies, driver behavior, and/or driving conditions.

The federal government issued new CAFE standards in 2012 for model years 2017 to 2025 that required a fleet average of 54.5 miles per gallon (mpg) for model year 2025. However, on March 30, 2020, the United States Environmental Protection Agency (EPA) finalized an updated CAFE and greenhouse gas (GHG) emissions standards for passenger cars and light trucks and established new standards, covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021 through 2026. Under SAFE, the fuel economy standards will increase 1.5 percent per year compared to the 5 percent

per year under the CAFE standards established in 2012. Overall, SAFE requires a fleet average of 40.4 mpg for model year 2026 vehicles (85 Federal Register 24174 (April 30, 2020)).

On December 21, 2021, under direction of Executive Order (EO) 13990 issued by President Biden, the National Highway Traffic Safety Administration repealed Safer Affordable Fuel Efficient Vehicles Rule Part One, which had preempted state and local laws related to fuel economy standards. In addition, on March 31, 2022, the National Highway Traffic Safety Administration finalized new fuel standards in response to EO 13990. Fuel efficiency under the standards proposed will increase 8 percent annually for model years 2024 to 2025 and 10 percent annually for model year 2026. Overall, the new CAFE standards require a fleet average of 49 mpg for passenger vehicles and light trucks for model year 2026, which would be a 10 mpg increase relative to model year 2021 (NHTSA 2021).

Energy Independence and Security Act of 2007

The Energy Independence and Security Act of 2007 (Public Law 110-140) seeks to provide the nation with greater energy independence and security by increasing the production of clean renewable fuels; improving vehicle fuel economy; and increasing the efficiency of products, buildings, and vehicles. It also seeks to improve the energy performance of the federal government. The act sets increased CAFE Standards; the Renewable Fuel Standard; appliance energy-efficiency standards; building energy-efficiency standards; and accelerated research and development tasks on renewable energy sources—e.g., solar energy, geothermal energy, and marine and hydrokinetic renewable energy technologies), carbon capture, and sequestration (USEPA 2023).

Energy Policy Act of 2005

Passed by Congress in July 2005, the Energy Policy Act includes a comprehensive set of provisions to address energy issues. It includes tax incentives for energy conservation improvements in commercial and residential buildings, fossil fuel production and clean coal facilities, and construction and operation of nuclear power plants, among other things. Subsidies are also included for geothermal, wind energy, and other alternative energy producers.

National Energy Policy

Established in 2001 by the National Energy Policy Development Group, the National Energy Policy is designed to help the private sector and state and local governments promote dependable, affordable, and environmentally sound production and distribution of energy for the future. Key issues addressed by the energy policy are energy conservation, repair and expansion of energy infrastructure, and ways of increasing energy supplies while protecting the environment.

Natural Gas Pipeline Safety Act of 1968

The Natural Gas Pipeline Safety Act of 1968 authorizes the United States Department of Transportation to regulate pipeline transportation of flammable, toxic, or corrosive natural gas and other gases as well as the transportation and storage of liquefied natural gas. The Pipeline and Hazardous Materials Safety Administration

within the United States Department of Transportation develops and enforces regulations for the safe, reliable, and environmentally sound operation of the nation's 2.6-million-mile pipeline transportation system.

State

Warren-Alquist Act and the California Energy Commission

The Warren-Alquist Act created the California Energy Commission (CEC) in 1974 in response to the energy crisis of the early 1970s and the state's unsustainable growing demand for energy resources. The CEC's core responsibilities include advancing State energy policy, encouraging energy efficiency, certifying thermal power plants, investing in energy innovation, developing renewable energy, transforming transportation, and preparing for energy emergencies. The Warren-Alquist Act is updated annually to address current energy needs and issues, and its latest edition was in January 2023.

The CEC is charged with six basic responsibilities when designing state energy policy:

- Forecast statewide electricity needs.
- License power plants to meet those needs.
- Promote energy conservation and efficiency measures.
- Develop renewable energy resources and alternative energy technologies.
- Promote research, development and demonstration.
- Plan for and direct the state's response to energy emergencies.

California Public Utilities Commission

In September 2008, the California Public Utilities Commission (CPUC) adopted the Long-Term Energy Efficiency Strategic Plan, which provides a framework for energy efficiency in California through the year 2020 and beyond. It articulates a long-term vision, as well as goals for each economic sector, identifying specific near-term, mid-term, and long-term strategies to assist in achieving these goals. The Strategic Plan sets the following four goals, known as "Big Bold Energy Efficiency Strategies," to achieve significant reductions in energy demand:

- All new residential construction in California will be zero net energy by 2020.[1]
- All new commercial construction in California will be zero net energy by 2030.
- Heating, ventilation and air conditioning (HVAC) will be transformed to ensure that its energy performance is optimal for California's climate.
- All eligible low-income customers will be given the opportunity to participate in the low-income energy efficiency program by 2020.

[1] Zero net energy buildings are buildings where the annual amount of energy used is equal to or less than the amount of energy created on the site.

With respect to the commercial sector, the Strategic Plan notes that commercial buildings, which include schools, hospitals, and public buildings, consume more electricity than any other end-use sector in California. The commercial sector's five-billion-plus square feet of space accounts for 38 percent of the state's power use and over 25 percent of natural gas consumption. Lighting, cooling, refrigeration, and ventilation account for 75 percent of all commercial electricity use, and space heating, water heating, and cooking account for over 90 percent of gas use. In 2006, schools and colleges were in the top five facility types for electricity and gas consumption, accounting for approximately 10 percent of state's electricity and gas use (CPUC 2011).

The CPUC and CEC have adopted the following goals to achieve zero net energy levels by 2030 in the commercial sector:

- **Goal 1:** New construction will increasingly embrace zero net energy performance (including clean, distributed generation), reaching 100 percent penetration of new starts in 2030.
- **Goal 2:** 50 percent of existing buildings will be retrofit to zero net energy by 2030 through achievement of deep levels of energy efficiency and with the addition of clean distributed generation.
- **Goal 3:** Transform the commercial lighting market through technological advancement and innovative utility initiatives.

Renewable Portfolio: Carbon Neutrality Regulations

Senate Bills 1078, 107, X1-2, and Executive Order S-14-08

The California Renewables Portfolio Standard (RPS) was established in 2002 under Senate Bill (SB) 1078 and was amended in 2006, 2011, and 2018. The RPS program requires investor-owned utilities, electric service providers, and community choice aggregators to increase the use of eligible renewable energy resources to 33 percent of total procurement by 2020. Initially under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent to reach at least 20 percent by December 30, 2010. Executive Order S-14-08 was signed in November 2008, which expanded the state's Renewable Energy Standard to 33 percent renewable power by 2020. This standard was adopted by the California legislature in 2011 (SB X1-2). The CPUC is required to provide quarterly progress reports on progress toward RPS goals. This has accelerated the development of renewable energy projects throughout the state. For year 2020, the three largest retail energy utilities provided an average of 43 percent of their supplies from renewable energy sources. Community choice aggregators provided an average of 41 percent of their supplies from renewable sources (CPUC 2021).

Senate Bill 350

Governor Jerry Brown signed SB 350 on October 7, 2015, which expands the RPS by establishing a goal of 50 percent of the total electricity sold to retail customers in California per year by December 31, 2030. In addition, SB 350 includes the goal to double the energy efficiency savings in electricity and natural gas final end uses (such as heating, cooling, lighting, or class of energy uses upon which an energy efficiency program is focused) of retail customers through energy conservation and efficiency. The bill also requires the CPUC, in consultation with the CEC, to establish efficiency targets for electrical and gas corporations consistent with this goal. SB

350 also provides for the transformation of the California Independent System Operator into a regional organization to promote the development of regional electricity transmission markets in the western states and to improve the access of consumers served by the California Independent System Operator to those markets, pursuant to a specified process.

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100, which replaces the SB 350 requirements. Under SB 100, the RPS for public owned facilities and retail sellers consist of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. Additionally, SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill also establishes an overall 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 the bill, the State cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

Senate Bill 1020

SB 1020 was signed into law on September 16, 2022. It requires renewable energy and zero-carbon resources to supply 90 percent of all retail electricity sales by 2035 and 95 percent by 2040. Additionally, SB 1020 requires all state agencies to procure 100 percent of electricity from renewable energy and zero-carbon resources by 2035.

Energy Efficiency Regulations

Title 20, Appliance Efficiency Regulations

California's Appliance Efficiency Regulations contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California (California Code of Regulations Title 20, Sections 1600–1608). These standards are updated regularly to allow consideration of new energy efficiency technologies and methods (CEC 2017).

California Building Standards Code: Title 24, Part 6, Energy Efficiency Standards

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 and most recently revised in 2022 (California Code of Regulations Title 24, Part 6). Title 24 Part 6 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

On August 11, 2021, the CEC adopted the 2022 Building Energy Efficiency Standards, which were subsequently approved by the California Building Standards Commission in December 2021. The 2022 standards became effective and replaced the existing 2019 standards on January 1, 2023. The 2022 standards include prescriptive photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more

than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers (CEC 2021).

California Building Standards Code: Title 24, Part 11, Green Building Standards

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code or "CALGreen" (24 CCR, Part 11) was adopted as part of the California Building Standards Code. CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The mandatory provisions of CALGreen became effective January 1, 2011. In 2021, the CEC approved the 2022 CALGreen, which went into effect on January 1, 2023, replacing the existing 2019 standards.

2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601 through 1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances. They contain energy performance, energy design, water performance, and water design standards for appliances (including refrigerators, ice makers, vending machines, freezers, water heaters, fans, boilers, washing machines, dryers, air conditioners, pool equipment, and plumbing fittings) that are sold or offered for sale in California. These standards are updated regularly to allow consideration of new energy efficiency technologies and methods.

Off-Road Equipment and Transportation-Related Regulations

Assembly Bill 1493

California vehicle GHG emission standards were enacted under Assembly Bill (AB) 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and is anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model year 2017 through 2025 light-duty vehicles (see also the discussion on the update to the CAFE standards in Section 5.5.1.1 under "Federal"). In January 2012, the California Air Resources Board (CARB) approved the Pavley Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combines the control of smog, soot, and global warming gases and requirements for greater numbers of zero-emission vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025, new automobiles will emit 34 percent fewer global warming gases and 75 percent fewer smog-forming emissions (CARB 2017).

Title 13, Chapter 9, Article 4.8, Section 2449

Section 2449 of the California Code of Regulations, Title 13, Chapter 9, Article 4.8 was adopted on May 2, 2008, and limits nonessential idling of fleets to no more than five consecutive minutes at any location. This idling restriction applies to all vehicles in California with a diesel-fueled or alternative diesel-fueled off-road engine, unless a waiver provides sufficient justification that such idling is necessary.

Senate Bill 375

In 2008, SB 375, the Sustainable Communities and Climate Protection Act, was adopted to connect the GHG emissions reductions targets established in the 2008 Scoping Plan for the transportation sector to local land use decisions that affect travel behavior. Its intent is to reduce GHG emissions from light-duty trucks and automobiles (excludes emissions associated with goods movement) by aligning regional long-range transportation plans, investments, and housing allocations to local land use planning to reduce vehicle miles traveled (VMT) and vehicle trips. Specifically, SB 375 required CARB to establish GHG emissions reduction targets for each of the 18 metropolitan planning organizations (MPO) and 26 regional transportation planning agency (RTPA). The Amador County Transportation Commission (ACTC) is the RTPA for the Amador region, which includes the Amador County and the County's five incorporated cities: Amador City, Ione, Jackson, Plymouth, and Sutter Creek. Pursuant to the recommendations of the Regional Transportation Advisory Committee, CARB adopted per capita reduction targets for each of the MPOs rather than a total magnitude reduction target.

Executive Order N-79-20

On September 23, 2020, Executive Order N-79-20 was issued, which sets a time frame for the transition to zero-emissions (ZE) passenger vehicles and trucks in addition to off-road equipment. It directs CARB to develop and propose the following:

- Passenger vehicle and truck regulations requiring increasing volumes of new ZEVs (zero-emission vehicles) sold in California toward the target of 100 percent of in-state sales by 2035.
- Medium- and heavy-duty vehicle regulations requiring increasing volumes of new ZE trucks and buses sold and operated in California toward the target of 100 percent of the fleet transitioning to ZEVs by 2045 everywhere feasible, and for all drayage trucks to be ZE by 2035.
- Strategies to achieve 100 percent zero emissions from all off-road vehicles and equipment operations in California by 2035, in cooperation with other State agencies, the EPA, and local air districts.

On August 25, 2022, CARB adopted the Advanced Clean Cars II (ACC II) regulations that codifies the executive order goal of 100 percent of in-state sales of new passenger vehicles and trucks be ZE by 2035. Starting in year 2026, ACC II requires that 35 percent of new vehicles sold be ZE or plug-in hybrids.

Advanced Clean Fleets Regulation

In April 2023, CARB released the Advanced Clean Fleets (ACF) regulation to accelerate the transition to zero-emission medium- and heavy-duty vehicles (CARB 2023). In conjunction with the Advanced Clean Trucks (ACT) regulation, the ACF regulations helps to ensure that medium- and heavy-duty zero-emission vehicles (ZEV) are brought to the market, by requiring certain fleets to purchase ZEVs. The ACF ZEV phase-in approach which provides initial focus where the best fleet electrification opportunities exist, sets clear targets for regulated fleets to make a full conversion to ZEVs, and creates a catalyst to accelerate development of a heavy-duty public infrastructure network.

The ACF regulations cover four main elements:

- Manufacturer sales mandate. Manufacturers may sell only zero-emission medium- and heavy-duty vehicles starting in 2036.
- Drayage fleets. Beginning January 1, 2024, trucks must be registered in the CARB Online System to conduct drayage activities in California. Non-zero-emission "legacy" drayage trucks may register in the CARB Online System through December 31, 2023. Legacy drayage trucks can continue to operate through their minimum useful life. Beginning January 1, 2024, only zero-emission drayage trucks may register in the CARB Online System. All drayage trucks entering seaports and intermodal railyards would be required to be zero emission by 2035.
- High priority and federal fleets. High priority and federal fleets must comply with the Model Year Schedule or may elect to use the optional ZEVMilestones Option to phase in ZEVs into their fleets:
    - Model Year Schedule: Fleets must purchase only ZEVs beginning 2024 and, starting January 1, 2025, must remove internal combustion engine vehicles at the end of their useful life as specified in the regulation.
    - ZEVMilestones Option (Optional): Instead of the Model Year Schedule, fleets may elect to meet ZEV targets as a percentage of the total fleet starting with vehicle types that are most suitable for electrification.
- State and local agencies. State and local government fleets, including city, county, special district, and State agency fleets, would be required to ensure 50 percent of vehicle purchases are ZE beginning in 2024 and 100 percent of vehicle purchases are ZE by 2027. Small government fleets (those with 10 or fewer vehicles) and those in designated counties would start their ZEV purchases beginning in 2027. Alternately, State and local government fleet owners may elect to meet ZEV targets using the ZEVMilestones Option. State and local government fleets may purchase either ZEVs or near-ZEVs, or a combination of ZEVs and near-ZEVs, until 2035. Starting in 2035, only ZEVs will meet the requirements.

The ACF regulations would also establish requirements that transform the medium- and heavy-duty vehicle sector and demonstrate independent utility through achievement of the following objectives:

- Achieve criteria and GHG emissions reductions consistent with the goals identified in the State Implementation Plan (SIP) Strategy and Scoping Plan.
- Provide emissions reductions in disadvantaged communities, thereby supporting the implementation of AB 617 (Garcia, C., Chapter 136, Statutes of 2017).
- Support the goals of Executive Order N-79-20, which calls for accelerated ZEV deployment with these targets:
    - 100 percent ZE drayage by 2035.
    - 100 percent ZE trucks and buses where feasible by 2045.
    - Ensure requirements, such as ZEV deployment schedules and related infrastructure build-out, are technologically feasible, cost-effective, and support market conditions.
    - Lead the transition away from petroleum fuels and towards electric drivetrains.
    - Contribute towards achieving carbon neutrality in California pursuant to SB 100 and in accordance with Executive Order B-55-18.
    - Mindfully set requirements to allow time for public ZE infrastructure buildout for smaller fleets or for regional haul applications who would be reliant on a regional network of public chargers.
    - Ensure manufacturers and fleets work together to place ZEVs in service suitably and successfully as market expands.
    - Establish a fair and level playing field among fleet owners.
    - Craft the proposed project in a way that ensures institutional capacity for CARB to manage, implement, and enforce requirements.

Energy Storage

California has set ambitious long-term goals for energy storage beyond 2026 to support its clean energy and climate goals. The state aims to reach 100 percent carbon-free electricity by 2045, which will require significant investment in renewable energy sources like wind and solar, as well as energy storage technologies to balance the variability of these sources.

The California Independent System Operator (CAISO) has a total energy storage capacity of more than 3,160 megawatts (MW) as of June 2022 (CAISO 2022). This includes both large-scale and distributed energy storage systems, such as batteries, pumped hydroelectric storage, and thermal storage. CAISO is responsible for managing the electricity grid for much of California, and it has set a target of adding 3,300 MW of additional energy storage capacity by 2024 to support the integration of more renewable energy sources like wind and solar. As part of SB 100, load-serving entities (LSE) were required to procure no less than 1.3 gigawatts (GW) of energy storage capacity by 2020, and 3 GW by 2030. Additionally, the CPUC has established a target of 15 GW of energy storage capacity by 2030 (CPUC 2022).

The Integrated Resource Plan (IRP)

CAISO develops a coordinated grid management plan to integrate the generation and storage capacities of LSEs, called the Integrated Resource Plan (IRP). The IRP is a comprehensive planning document that outlines CAISO's forecasts for electricity demand, supply, and transmission needs over a 20-year planning horizon, as well as its strategies for integrating renewable energy resources and other grid services to meet those needs. The plan is developed in collaboration with LSEs, regulators, and other stakeholders and is updated periodically to reflect changes in the energy landscape and evolving policy goals. Overall, the IRP plays a critical role in ensuring the reliability and resilience of California's electricity grid as the state continues to transition to a cleaner and more sustainable energy system.

When an individual Battery Energy Storage (BES) facility or generation infrastructure (i.e., solar panels) comes online in California, it is typically included in the IRP through a process known as the Interconnection Queue. The Interconnection Queue is managed by the CAISO, which oversees the operation of the State's electricity grid.

The Interconnection Queue

The Interconnection Queue is an application process that functions as a waiting list of proposed electricity generation and storage projects that are seeking to connect to the grid. When a new BES facility or generation infrastructure is proposed, the developer submits an application to CAISO to request an interconnection to the grid. CAISO evaluates the application to ensure that the facility meets technical and operational requirements, such as voltage regulation and frequency response, and that it can be integrated effectively into the grid.

Once the BES facility or generation infrastructure is approved by CAISO, it is assigned a point of interconnection on the grid, and its output is added to the IRP as a resource that can provide electricity and other grid services, such as frequency regulation or ramping support. The facility is then dispatched by CAISO based on its bids into the day-ahead and real-time electricity markets, and its output is used to help balance supply and demand on the grid in real-time.

Overall, the Interconnection Queue is an important mechanism for integrating new BES facilities and other electricity resources into the California grid and for ensuring that the grid remains reliable and resilient as the state continues to transition to a cleaner and more sustainable energy system.

Local

Amador County General Plan

The Conservation Element establishes energy policies designed to encourage energy conservation and efficiency (Amador County 2016). Increasing energy efficiency and making better use of current and local energy resources can reduce direct and hidden energy costs in the future, as energy costs rise and sources of energy become more difficult to obtain. Conservation Element goals and policies regarding energy resources are:

- **Goal C-6:** Reduce energy use and promote renewable and locally available sources of energy.

- **Policy C-6.1:** Encourage new development to be pedestrian-friendly, and located near existing activity centers to limit energy use associated with automobile transportation.
- **Policy C-6.2:** Encourage energy-efficient businesses and manufacturers of green products to locate in Amador County.
- **Policy C-6.3:** Promote increased energy efficiency and green building practices through the County's use of these practices and through use of incentives.
- **Policy C-6.4:** Encourage development of renewable energy generation options.
- **Policy C-6.5:** Support use of renewable and locally-available sources of energy where feasible.
- **Policy C-9.4:** Encourage energy conservation and energy efficient design in new development projects.
- **Goal C-10:** Reduce GHG emissions associated with automobile travel, electrical power generation and energy use.
- **Policy C-10.5:** Require new development projects to incorporate building placement and design features to increase energy efficiency in new structures.
- **Policy C-10.6:** Support green building through incentives for Leadership in Energy and Environmental Design (LEED) certification of new commercial, industrial, public, and multi-family residential buildings. Promote incentives for compliance with this standard as a way to increase the energy efficiency of new structures. Promote increased energy efficiency and green building practices through the County's use of these practices.
- **Policy C-10.7:** Support parcel-scale energy generation, including addition of solar panels for residential structures and cogeneration for larger commercial or industrial uses.

Amador County Transportation Commission

ACTC is the State designated RTPA and Local Transportation Commission (LTC) serving the Amador Region (ACTC 2023). As the Region's LTC, the ACTC oversees the use of Local Transportation Funds pursuant to the State's Transportation Development Act for funding public transit and other purposes.

Additionally, ACTC is responsible for adopting and maintaining the County's Regional Transportation Plan (RTP). The latest 2020 RTP Update reflects progress toward implementing the 2015 RTP and ensures compliance with the California Transportation Commission's 2017 Regional Transportation Guidelines (ACTC 2020). The RTP identifies the region's short-term and long-range transportation needs and establishes policies, programs, and projects designed to meet those needs for the next 20 years.

Amador County Energy Action Plan

On May 26, 2015, the Board of Supervisors adopted the Energy Action Plan as the County's roadmap for expanding energy-efficiency and renewable energy and the associated cost-savings from these efforts (Amador County 2015). The document focuses on three energy use sectors in the community—residential, nonresidential, and municipal (subset of nonresidential).

City of Ione General Plan

The City of Ione General Plan is the primary planning document for the city. It sets goals, policies, and actions concerning the community and directs growth and development. Goals, policies, and actions related to energy impacts are as follows (Ione 2009):

- **Policy CO-6.1:** Promote infill development as a means to limit vehicle trips and reduce the environmental impacts of new development and land use patterns.
- **Policy CO-6.2:** Increase energy conservation Citywide.
- **Policy CO-6.3:** Promote the development and use of advanced energy technology and building materials in Ione.
- **Policy CO-6.4:** Promote energy rebate programs offered by local energy providers as a way to bring energy efficiency into older neighborhoods and developments.
- **Policy PF-11.3**: The City shall encourage, support, and evaluate the provision of proven, cost-effective, and feasible alternate forms of energy, including solar and wind power in Ione.
- **Goal H-7:** Promote the conservation of natural resources and energy in housing design requirements.
- **Policy H-7.1:** Encourage the reduction of energy use and the conservation of natural resources in the development of housing through implementation of the State Energy Conservation Standards.

City of Ione Municipal Code

Ione Municipal Code (IMC) includes various directives to minimize adverse impacts related to energy impacts in Ione. The IMC is organized by title, article, chapter, and section. Most provisions related to energy impacts are included in Title 8, Health and Safety, Title 15, Buildings and Construction, and Title 17, Zoning, as follows:

- **Chapter 8.32, Organic Waste Disposal Reduction.** This chapter would implement Assembly Bill 939 of 1989, the California Integrated Waste Management Act of 1989, which requires cities and counties to reduce, reuse, and recycle (including composting) solid waste generated in their jurisdictions to the maximum extent feasible before any incineration or landfill disposal of waste, to conserve water, energy, and other natural resources, and to protect the environment.

- **Chapter 15.04, California Building Code.** This chapter provides regulations for all new construction and any alterations, repairs, relocations, or reconstruction of any building. This chapter ensures that the minimum requirements and standards for building standards are met to protect the public safety and welfare of the city. Section 15.18.010, *California Energy Code - Adopted by reference*, establishes that the City adopts the 2019 edition of the California Energy Code, Title 24, Part 6 as adopted by the California Building Standards Commission in Title 24 Part 6 of the California Code of Regulations, and all future amendments adopted by the City.

- **Chapter 17.42, Signs on Private Property.** This chapter establishes regulations for signs within the city for the purposes of safeguarding and protecting the public health, safety, and welfare through appropriate prohibitions. Section 17.42.080, Design standards, enforces that light sources shall utilize energy efficient fixtures to the greatest extent possible and shall comply with Title 24 of the California Code of Regulations (California Building Standards Code).

City of Jackson General Plan

The City of Jackson General Plan is the primary planning document for the city. Goals, objectives, and policies related to energy impacts are outlined here (Jackson 2008a, 2008b):

Circulation Element

- **Policy 2.A.3**: The City shall require that new development's internal circulation plans include provisions for pedestrians, bicycles, automobiles, parking, and bus facilities as well as Neighborhood Electric Vehicles (NEVs) consistent with separately adopted alternative transportation plans and/or guidelines.

- **Policy 5.A.1:** The City shall encourage alternatives to single-occupant vehicle trips and make alternatives available to the extent deemed practical and economical.

- **Goal 6:** To provide a safe, comprehensive and integrated circulation system for non-motorized transportation.

Land Use Element

- **Policy 1.8:** A balanced mix of housing, workplaces, shopping, recreational opportunities, and institutional uses, including mixed-use structures (combined residential and non-residential uses), that help to reduce vehicular trips shall be encouraged.

- **Policy 4.2:** To increase pedestrian access, development standards shall be created which require the installation of sidewalks for new development.

Currently, the City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals and policies related to energy are outlined here (Jackson 2023).

- **Goal COS-5:** Conserve energy through consumption reduction programs and the use of renewable resources.

- **Policy COS 5.1:** Require all development projects to comply with the mandatory energy efficiency requirements of the California Green Building Standards Code (CALGreen) and Building and Energy Efficiency Standards.
- **Policy COS 5.2:** Support and encourage the implementation of innovative and green building best management practices (BMPs) including, but not limited to, sustainable site planning, solar opportunities, LEED certification, and exceeding the most current "green" development standards in the California Code of Regulations (CCR), Title 24, as feasible.
- **Policy COS 5.3:** Promote energy efficiency throughout City operations and install, as feasible, energy-efficient lighting, appliances, and alternative-energy infrastructure in City facilities during routine maintenance and as upgrades are needed.
- **Policy COS 5.4:** As City fleet vehicles are replaced, procure alternative energy and fuel-efficient City vehicles and equipment that meet or surpass state emissions requirements, to the extent feasible.
- **Policy COS 5.5:** Promote incentives from local, state, and federal agencies for improving energy efficiency and expanding renewable energy installations.
- **Policy CIRC 2.3:** The City shall require that new development's internal circulation plans include provisions for pedestrians, bicycles, automobiles, parking, and bus facilities as well as Neighborhood Electric Vehicles (NEVs), if deemed feasible and beneficial, consistent with separately adopted alternative transportation plans and/or guidelines.
- **Policy CIRC 8.4:** Support the creation of electric vehicle charging stations at commercial, government, and other employment and community destinations.

City of Jackson Municipal Code

Jackson Municipal Code (JMC) includes various directives to minimize adverse impacts related to energy impacts in Jackson. The JMC is organized by title, article, chapter, and section. Most provisions related to energy impacts are included in Title 14, Buildings and Construction, and Title 17, Development Code, as follows:

- **Chapter 14.04, Uniform Codes.** This chapter provides regulations for all new construction and any alterations, repairs, relocations, or reconstruction of any building. This chapter ensures that the minimum requirements and standards for building standards are met to protect the public safety and welfare of the city. Section 14.04.010, *Adoption of Codes and related appendices*, establishes that the City adopts the 2022 edition of the California Building Standards and Title 24 of the California Code of Regulations to ensure buildings are developed up to code. This also includes the California Energy Code and CAL Green.
- **Chapter 17.48, Parking and Loading Standards.** This chapter provides off-street parking and loading standards within the City. Section 17.48.100, Off-Street Loading Space Requirements, requires that Lighting standards shall be energy-efficient and in scale with the height and use of adjacent structure(s).

- **Chapter 17.54, Sign Regulations.** This chapter establishes standards for signage to meet all applicable building and safety codes in order to promote public health, safety, and general welfare. Section 17.54.152, Sign Illumination, requires that artificial illumination of signs shall utilize energy efficient fixtures to the greatest extent possible.

City of Jackson Energy Action Plan

The City of Jackson Energy Action Plan (EAP) is a road map for expanding energy-efficiency, water-efficiency and renewable-energy efforts already underway in the city (SBC 2015a). It builds upon efforts begun in 2010 and work conducted by Sierra Business Council in 2010 to 2012 and 2014. The EAP focuses on three energy use sectors within the community—residential, nonresidential, and municipal. The EAP specifies the actions and strategies in the following five key areas to achieve reductions in energy consumption and increased energy savings for residents, businesses, and local government.

- Energy efficiency in existing structures
- Energy performance in new construction
- Expansion of renewable energy options
- Energy efficiency in municipal operations
- Reduction in water waste which reduces energy needed to transport and treat water

City of Sutter Creek General Plan

The City of Sutter Creek General Plan is the primary planning document for the city. Objectives, policies, and implementation measures related to energy impacts are outlined here (Sutter Creek 2019).

- **Objective COS-1.10:** Increased energy conservation and renewable energy generation/production.
- **Policy COS-1.10.1:** New developments should be designed to maximize opportunities to limit use of automobiles, distance traveled to local destinations, and traffic congestion.
- **Policy COS-1.10.3:** New structures shall comply with California Energy Star guidelines or similar energy savings program that achieve a 20% reduction from standards contained in Title 24 of the California Code of Regulations. Compliance with Energy Star guidelines may occur through measures such as effective insulation, high performance windows, tight construction and ducts, efficient heating and cooling equipment, natural heating, and non-polluting energy production.
- **Policy COS-1.10.4:** New developments shall be designed to reduce heat island effects.

City of Sutter Creek Energy Action Plan

The City of Sutter Creek EAP is a roadmap for expanding energy-efficiency, water-efficiency and renewable-energy efforts already underway in the city (SBC 2015b). It builds upon efforts begun in 1994 with the General Plan and work conducted by Sierra Business Council in 2010 and 2011. The EAP focuses on three energy use sectors within the community—residential, nonresidential, and municipal.

The goal of the plan is to reduce electricity use in 2020 by 19 percent (from the business-as-usual forecast) and natural gas use by 5 percent. This translates to annual savings in 2020 of 3.97 million kilowatt-hours of electricity and 37,000 therms of natural gas. The EAP specifies the actions and strategies in five key areas to achieve reductions in energy consumption and increased energy savings for residents, businesses, and local governments.

- Energy efficiency in existing structures
- Energy performance in new construction
- Expansion of renewable energy options
- Energy efficiency in municipal operations
- Reduction in water waste which reduces energy needed to transport and treat water

City of Sutter Creek Municipal Code

Sutter Creek Municipal Code (SCMC) includes various directives to minimize adverse impacts related to energy impacts in Sutter Creek. The SCMC is organized by title, chapter, article, division, and section. Most provisions related to energy impacts are included in Title 9, Health and Welfare and Title 15, Building and Construction, as follows:

- **Chapter 9.08, Solid Waste.** This chapter sets out requirements related to removal of solid waste to ensure the public health, safety and welfare of the citizens within the City. Article V, Recycling Regulations, establishes the goal of recycling at least 50 percent, by weight, waste generated in order to help preserve resources, conserve energy, and reduce waste. Article VI, Organic Waste Disposal, relies on State recycling law, Assembly Bill 939 of 1989, the California Integrated Waste Management Act of 1989, which requires cities and counties to reduce, reuse, and recycle (including composting) solid waste generated in their jurisdictions to the maximum extent feasible before any incineration or landfill disposal of waste, to conserve water, energy, and other natural resources, and to protect the environment.

- **Chapter 15.04, Uniform Codes.** This chapter provides regulations for all new construction and any alterations, repairs, relocations, or reconstruction of any building. This chapter ensures that the minimum requirements and standards for building standards are met to protect the public safety and welfare of the city. Section 15.04.010, Adoption of Codes and related appendices, establishes that the City adopts the 2019 edition of the California Building Standards and Title 24 of the California Code of Regulations to ensure buildings are developed up to code. This also includes the California Energy Code and CALGreen.

5.5.1.2 EXISTING CONDITIONS

This section presents information on the service areas of the energy providers and supply in the Amador region.

Energy Provider

Pacific Gas & Electric (PG&E) serves the region as described below.

Electricity

PG&E is a publicly traded utility company which generates, purchases, and transmits energy and natural gas under contract with the CPUC. PG&E's service territory is 70,000 square miles, roughly extending north to Eureka, south to Bakersfield, west to the Pacific Ocean, and east to the Sierra Nevada Mountain range. PG&E's electricity distribution system consists of 106,681 circuit-miles of electric distribution lines and 18,466 circuit-miles of interconnected transmission lines (PG&E 2023a). PG&E owns and maintains above-ground networks of electric transmission and distribution facilities throughout Amador County.

PG&E electricity is generated by a combination of sources such as coal-fired power plants, nuclear power plants, and hydro-electric dams as well as newer sources of energy such as wind turbines and photovoltaic plants or solar farms. The bulk electric grid is a network of high-voltage transmission lines linked to power plants in the PG&E system. The distribution system consists of lower voltage secondary lines at the street and neighborhood level, with overhead or underground distribution lines, transformers, and individual service "drops" that connect to the individual customer. PG&E is the sole provider of electricity services to the region.

Natural Gas

PG&E gas transmission pipeline systems serve approximately 4.5 million gas customers in northern and central California (PG&E 2023a). The system is operated under an inspection and monitoring program. The system operates in real time on a 24-hour basis and includes leak inspections, surveys, and patrols of the pipelines. PG&E also adopted Pipeline 2020 program, which aims to modernize critical pipeline infrastructure, expand the use of automatic or remotely operated shut-off valves, catalyze development of next-generation inspection technologies, develop industry-leading best practices, and enhance public safety partnerships with local communities, public officials, and first responders. Total natural gas consumption in PG&E's service area was 449.3 trillion BTU for 2021 (CEC 2023a).

In 2021, roughly half of PG&E's energy came from renewable resources, including biopower, geothermal, small hydroelectric, solar, and wind power. PG&E's portfolio consists of 7 percent natural gas, 39 percent non emitting nuclear generation, 4 percent large hydroelectric facilities, and 50 percent eligible renewable energies, which includes small hydroelectric and wind (PG&E 2023b). PG&E is the sole provider of natural gas services to the region.

Existing Energy Use

Each of the project sites are developed with an existing school campus and operate as a school use, which is served by PG&E gas and electric infrastructure.

5.5.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

E-1 Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

E-2 Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

5.5.3 Environmental Impacts

5.5.3.1 METHODOLOGY

Based on CEQA Guidelines Appendix F, to ensure energy implications are considered in project decisions, EIRs should include a discussion of the potential impacts of proposed projects, with particular emphasis on avoiding or reducing wasteful, unnecessary, or inefficient use of energy resources. Environmental effects may include the proposed project's energy requirements and its energy use efficiencies by amount and fuel type during construction and operation; the effects of the proposed project on peak- and base-period demands for electricity and other forms of energy; the degree to which the proposed project complies with existing energy standards; the effects of the proposed project on energy resources; and the proposed project's projected transportation energy use requirements and its overall use of efficient transportation alternatives, if applicable.

A quantified analysis of the proposed project's total energy demand was estimated based on the maximum development scenario (Argonaut HS Site Improvements) using California Emissions Estimator Model (CalEEMod) default energy rates.

5.5.3.2 IMPACT ANALYSIS

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.5-1: Project construction and operation would not cause wasteful, inefficient, or unnecessary energy use. (Threshold E-1)

School Closure/Consolidation Program Project

Short-Term Construction Impacts

The proposed project would require physical site improvements to occur at three ACUSD campuses to accommodate the consolidation of eight campuses onto six current ACUSD campuses. Construction of development associated with the site improvements at the three ACUSD campuses would create temporary increased demands for electricity and vehicle fuels compared to existing conditions and would result in short-term transportation-related energy use.

Electrical Energy

Construction activities associated with the proposed project would require electricity to power the construction equipment. The electricity use during construction would vary during different phases of construction. The majority of construction equipment during demolition and site preparation would be gas or diesel powered, and the later construction phases would require electricity-powered equipment for interior construction and architectural coatings. Overall, the use of electricity would be temporary in nature and would fluctuate according to the phase of construction. Additionally, 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, construction activities of the proposed project would not result in wasteful, inefficient, or unnecessary electricity demands as electricity consumption would be limited to tasks necessary to complete project construction, and impacts would be **less than significant**.

Natural Gas Energy

No natural gas demand is anticipated during construction. Therefore, there would be **no impact** with respect to natural gas usage during overall project construction.

Transportation Energy

Transportation energy use depends on the type and number of trips, vehicle miles traveled (VMT), fuel efficiency of vehicles, and travel mode. Additionally, transportation energy use during construction would come from the transport and use of construction equipment, delivery vehicles and haul trucks, 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 phase of construction and would be temporary. The majority of off-road construction equipment, such as those used during demolition and grading, would be gasoline or diesel powered.

In addition, all construction equipment would cease operating upon completion of the proposed project's construction. Thus, impacts related to transportation energy use during construction would be temporary and would not require expanded energy supplies or the construction of new infrastructure. To limit wasteful and unnecessary energy consumption, the construction contractors shall minimize nonessential idling of construction equipment during construction, in accordance with section 2449 of CCR, Title 13, Article 4.8, Chapter 9, which limits nonessential idling of diesel-powered off-road equipment to 5 minutes or less.

Construction trips would also not result in unnecessary use of energy since the ACUSD campuses within the school closure/consolidation program are centrally located and served by regional roadways that provide direct routes from various areas of the region to the campuses. Thus, energy use during construction of the proposed project would not be considered inefficient, wasteful, or unnecessary. There would be a **less than significant impact** with respect to transportation energy usage during project construction.

Long-Term Impacts During Operation

The proposed project includes the consolidation of eight underutilized campuses into six campuses, which would result in a more efficient use of resources, such as electricity and natural gas. Due to the nature of the proposed project and the decrease in building square footage because of the closure of Ione ES and Sutter Creek Primary School, operation of the proposed project would not create additional demands for electricity and natural gas as compared to existing conditions.

Electrical Energy

The proposed project involves site improvements at three ACUSD campuses to accommodate the consolidation of eight campuses onto six current ACUSD campuses. The proposed project would not increase student enrollment in the District (which could increase electricity use); instead, the proposed project is a school closure/consolidation program that would provide for a more efficient use of resources, including electricity.

The decrease in student enrollment from the conversion of Jackson Junior HS to County Preschool Center and the decrease in building square footage from the closure of Ione ES and Sutter Creek Primary School would lead to an overall net decrease in electricity consumption compared to existing conditions.

Electrical service to the ACUSD campuses that are part of the proposed project would continue to be provided by PG&E through connections to existing off-site electrical lines. Moreover, the proposed school buildings would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements. As the Building Energy Efficiency Standards mandate an increase in building energy efficiency every three years, the new buildings to be constructed would be more energy efficient (CEC 2022). In other words, because the proposed school buildings would be designed in compliance with the latest Building Energy Efficient Standards and CALGreen requirements, they would be more energy efficient on a per-square-foot basis compared to prior building energy efficiency standards.

As described in Chapter 3, *Project Description*, the proposed school buildings would be designed to be all-electric buildings, which would satisfy Sacramento Metropolitan Air Quality Management District's (SMAQMD's) applicable Tier 1 best management practices (BMP) for all electric energy systems and electrical vehicle (EV) charging. Encouraging sustainable and energy-efficient building practices and using more renewable energy strategies will further minimize building-related energy consumption after buildout of the proposed project and move closer toward achieving zero net energy.

These features would promote the use of renewable energy and decrease reliance on fossil fuels to meet the electricity demands of the ACUSD. Because the proposed project would comply with these regulations and would provide features to decrease electricity use at the remaining six ACUSD campuses, it would not result in wasteful, inefficient, or unnecessary electricity demands. Therefore, operation of the proposed project would result in a **less than significant impact** related to electricity.

Natural Gas Energy

The purpose of the proposed project is to consolidate school resources for efficient program administration and focus resources on fewer facilities, so the operation of the proposed project would more efficiently use natural resources. The decrease in student enrollment from the conversion of Jackson Junior HS to County Preschool Center and the decrease in building square footage from the closure of Ione ES and Sutter Creek Primary School would lead to an overall net decrease in natural gas consumption compared to existing conditions. Additionally, the proposed buildings at Argonaut HS, Ione Junior HS, and Sutter Creek ES campus would be all-electric. The new buildings would be consistent with the requirements of the Building Energy Efficiency Standards and would not result in an increase in natural gas consumption compared to existing conditions.

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

Transportation Energy

The proposed project would result in the consumption of transportation energy during operation from the use of motor vehicles. The efficiency of the motor vehicles in use (average miles per gallon) is unknown and highly variable. Thus, estimates of transportation energy use are based on the overall vehicle miles traveled (VMT) and related transportation energy use. The project-related VMT would primarily come from students, staff, and visitors commuting to each of the six ACUSD campuses.

As a result of the proposed project, the VMT per student would increase by 5.2 percent due to the relocation and consolidation of students (Kittelson & Associates 2023). While per person VMT estimates would increase during operation of the proposed project, the transportation energy consumed for student, employee, and visitor travel would be necessary for people to travel to and from their respective campus and would not constitute wasteful, inefficient, or unnecessary consumption of energy. The proposed project is expected to generate a total net increase of 3,413 daily vehicle trips on a typical weekday, including 1,032 vehicle trips during the AM peak hour and 625 vehicle trips during the PM peak hour across the three schools (Musunuru 2023). However, each of the six ACUSD campuses would continue to be local-serving land uses for the student population in the vicinity and provide circulation improvements to three of the ACUSD campuses, which would contribute to minimizing transportation-related fuel usage.

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 ACUSD campuses' region more fuel-efficient vehicle options.

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.

Argonaut High School Site Improvements

Short-Term Construction Impacts

The site improvements at Argonaut HS would require electricity consumption during construction activities. However, electricity demand would be temporary and would cease operating upon completion of the site

improvements at Argonaut HS. Construction of the proposed project would not require the use of natural gas. Construction trips would not result in unnecessary use of energy since Argonaut HS is served by regional roadways (e.g., State Route 88 and State Route 49). Thus, the construction energy use related to site improvements at Argonaut HS would result in a **less than significant impact** with respect to construction energy usage.

Long-Term Impacts During Operation

Electrical and Natural Gas Energy

An increase in building square footage from the site improvements at Argonaut HS to accommodate the combining of Amador to Argonaut HSs would create additional demands for electricity as compared to existing conditions. The proposed school building at Argonaut HS would not generate an increase in natural gas since the proposed building would be all-electric. Moreover, the proposed school building would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements, which would generally have a greater energy efficiency than the existing buildings.

Existing science classrooms on campus are expected to use natural gas for educational purposes. The increase in student enrollment at Argonaut HS would generate more electricity and natural gas demand at campus level. However, since the proposed project would not increase student enrollment within the District, the District's natural gas and electricity demand would remain the same. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary natural gas and electricity demands.

Consequently, operation of the renovated Argonaut HS campus would result in a **less than significant impact** related to electricity and natural gas usage.

Transportation Energy

The buildout of Argonaut HS is expected to generate 1,531 daily vehicle trips on a typical weekday, including 410 vehicle trips during the AM peak hour and 252 vehicle trips during the PM peak hour (Musunuru 2023). However, the Argonaut HS would continue to be local-serving land use for the existing students from Argonaut HS and students from Amador HS only located 4.6 miles away.

The site improvements at Argonaut HS would also result in an improvement to the access and circulation system near the Argonaut HS campus. A new parent drop-off/pick-up area, new access road connecting to Stony Creek Road, and accessibility compliance improvements would be built throughout the campus. Making the flow of traffic more efficient, which would decrease transportation-related energy by increasing drop-off/pick-up zones on campus and reducing the excessive idling. Lastly, as described above, 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 at Argonaut HS.

Ione Junior High School Site Improvements

Short-Term Construction Impacts

The site improvements at Ione Junior HS would require electricity consumption during construction activities. However, electricity demand would be temporary and would cease operating upon completion of the site improvements at Ione Junior HS. Construction of the proposed project would not require the use of natural gas. Construction trips would not result in unnecessary use of energy since Ione Junior HS is served by regional roadways (e.g., State Route 124 and State Route 104). Thus, the construction energy use related to site improvements at Ione Junior HS would result in a **less than significant impact** with respect to construction energy usage.

Long-Term Impacts During Operation

Electrical and Natural Gas Energy

An increase in building square footage from the site improvements at Ione Junior HS to accommodate the relocation of Ione ES would create additional demands for electricity as compared to existing conditions. The proposed school building at Ione Junior HS would not generate an increase in natural gas since the proposed building would be all-electric. Moreover, the proposed school building would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements, which would generally have a greater energy efficiency than the existing buildings.

To convert Ione Junior HS to an elementary school, the existing science classrooms will be converted to kindergarten classrooms and natural gas will not be utilized in those spaces. The increase in student enrollment at Ione Junior HS would generate more electricity and natural gas demand at campus level. However, since the proposed project would not increase student enrollment within the District, the District's natural gas and electricity demand would remain the same. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary natural gas and electricity demands.

Consequently, operation of the renovated Ione Junior HS campus would result in a **less than significant impact** related to electricity and natural gas usage.

Transportation Energy

Buildout of the Ione Junior HS campus is expected to generate 926 daily vehicle trips on a typical weekday, including 306 vehicle trips during the AM peak hour and 184 vehicle trips during the PM peak hour (Musunuru 2023). However, Ione Junior HS would continue to be local-serving land use for the transferred students from Ione ES only located 0.5 miles away.

The site improvements at Ione Junior HS would also result in an improvement to access at campus by expanding the parent drop-off/pick-up areas and kindergarten drop-off/pick-up areas. Making the flow of traffic more efficient would decrease transportation-related energy by increasing drop-off/pick-up zones on campus and reducing the excessive idling. Lastly, as described above, 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 at Ione Junior HS.

Sutter Creek Elementary School Site Improvements

Short-Term Construction Impacts

The site improvements at Sutter Creek ES would require electricity consumption during construction activities. However, electricity demand would be temporary and would cease operating upon completion of the site improvements at Sutter Creek ES. Construction of the proposed project would not require the use of natural gas. Construction trips would not result in unnecessary use of energy since Sutter Creek ES is served by regional roadways (e.g., Old Route 49 and State Route 49). Thus, the construction energy use related to site improvements at Sutter Creek ES would result in a **less than significant impact** with respect to construction energy usage.

Long-Term Impacts During Operation

Electrical and Natural Gas Energy

An increase in building square footage from the site improvements at Sutter Creek ES to create a TK through 6 grade campus would create additional demands for electricity as compared to existing conditions. The proposed school building at Sutter Creek ES would not generate an increase in natural gas since the proposed building would be all-electric. Moreover, the proposed school buildings would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements, which would generally have a greater energy efficiency than the existing buildings.

The increase in student enrollment at Sutter Creek ES would generate more electricity demand at campus level. However, since the proposed project would not increase student enrollment within the District, the District's electricity and natural gas demand would remain the same. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary electricity or natural gas demands at Sutter Creek ES.

Consequently, operation of the renovated Sutter Creek ES campus would result in a **less than significant impact** related to electricity and natural gas usage.

Transportation Energy

Buildout of the Sutter Creek ES is expected to generate 796 daily vehicle trips on a typical weekday, including 316 vehicle trips during the AM peak hour and 189 vehicle trips during the PM peak hour (Musunuru 2023). However, Sutter Creek ES would continue to be local-serving land use for the nearby student population.

The site improvements at Sutter Creek ES would not alter access locations or existing public roadways. As described above, 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 at Sutter Creek ES.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.5-2: Project development would not conflict with a State or local plan for renewable energy or energy efficiency. (Threshold E-2)

While the District is not subject to the energy action plans (EAP) from the County nor cities of Jackson and Sutter Creek, the following discussion evaluates consistency of the proposed project with California's RPS program, County EAP, City of Jackson EAP, and the City of Sutter Creek EAP.

School Closure/Consolidation Program Project

California Renewables Portfolio Standard Program

The State's electricity grid is transitioning to renewable energy under California's RPS Program. Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The RPS goals have been updated since adoption of SB 1078 in 2002. In general, California has RPS requirements of 33 percent renewable energy by 2020 (SB X1-2), 44 percent by 2024, 50 percent 2026 by, 52 percent by 2027, 60 percent by 2030, 90 percent by 2035, 95 percent by 2040, and 100 percent by 2045. The bill also established a state policy that eligible renewable energy resources and zero-carbon resources supply 100 percent of all retail sales of electricity to California end-use customers and 100 percent of electricity procured to serve all state agencies by December 31, 2045. Under SB 100 the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

The statewide RPS requirements do not directly apply to individual development projects, but to utilities and energy providers, such as PG&E, whose compliance with RPS requirements would contribute to the state objective of transitioning to renewable energy. The proposed project would not change the land use of the ACUSD school campuses and the site improvements at the three ACUSD campuses would comply with the current and future iterations of the Building Energy Efficiency Standards and CALGreen. Furthermore, the site improvements at Argonaut HS, Ione Junior HS, and Sutter Creek ES would include all-electric buildings, which would generally have greater energy efficiency than existing buildings and must comply with the latest Building Energy Efficiency Standards and CALGreen.

The proposed project would not increase student enrollment in the District (which could increase electricity use and natural gas use); instead, the proposed project is a school closure/consolidation program that would provide for a more efficient use of resources, including electricity and natural gas.

Therefore, implementation of the proposed project would not conflict with or obstruct implementation of California's RPS Program and impacts would be **less than significant**.

Amador County Energy Action Plan

The County's EAP focuses on expanding energy-efficiency and renewable energy across the County (Amador County 2015). Compliance with the current Building Energy Efficiency Standards and California Green Building Standards would ensure the proposed project would not result in wasteful or unnecessary electricity or natural gas demands. Additionally, per the RPS, the proposed project would utilize electricity provided by PG&E that is required to achieve 60 percent renewable energy by 2030. Therefore, the proposed project would

be consistent with the County's EAP goals to reduce energy consumption and achieve greater energy efficiency. The proposed project would not interfere with implementation of the County's EAP and impacts would be **less than significant**.

Argonaut High School Site Improvements

The proposed project at Argonaut HS would increase student enrollment on an existing high school and would not change the land use of the campus. The site improvements at Argonaut HS would comply with the current and future iterations of the Building Energy Efficiency Standards and CALGreen. Furthermore, the proposed school building at Argonaut HS would be all-electric onsite, as required by SMAQMD's Tier 1 BMP. Therefore, the proposed project at Argonaut HS would not conflict with or obstruct implementation of California's RPS Program and impacts would be **less than significant**.

Jackson Energy Action Plan

The City's EAP focuses on reducing energy in three main sectors within the community – residential, non-residential, and municipal (SBC 2015a). As stated previously, compliance with the current Building Energy Efficiency Standards and California Green Building Standards would ensure the proposed project at Argonaut HS would not result in wasteful or unnecessary electricity or natural gas demands. Additionally, per the RPS, the proposed project would utilize electricity provided by PG&E that is required to achieve 60 percent renewable energy by 2030. Therefore, the proposed project at Argonaut HS would be consistent with the City's EAP goals to reduce energy consumption and GHG emissions. The site improvements at Argonaut HS would not interfere with implementation of the City's EAP and impacts would be **less than significant**.

Ione Junior High School Site Improvements

The proposed project at Ione Junior HS would increase student enrollment on an existing school campus and would not change the land use of the campus. The site improvements at Ione Junior HS would comply with the current and future iterations of the Building Energy Efficiency Standards and CALGreen. Furthermore, the proposed school building at Ione Junior HS would encompass all-electric building onsite, as required by SMAQMD's Tier 1 BMP. Therefore, site improvements at Ione Junior HS would not conflict with or obstruct implementation of California's RPS Program and impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

The proposed project at Sutter Creek ES would increase student enrollment on an existing school campus and would not change the land use of the campus. The site improvements at Sutter Creek ES would comply with the current and future iterations of the Building Energy Efficiency Standards and CALGreen. Furthermore, the proposed school building at Sutter Creek ES would encompass all-electric building onsite, as required by SMAQMD's Tier 1 BMP. Therefore, site improvements at Sutter Creek ES would not conflict with or obstruct implementation of California's RPS Program and impacts would be **less than significant**.

Sutter Creek Energy Action Plan

The City's EAP focuses on reducing energy in three main sectors within the community – residential, non-residential, and municipal (SBC 2015b). Compliance with the current Building Energy Efficiency Standards and California Green Building Standards would ensure the proposed project at Sutter Creek ES would not result in wasteful or unnecessary electricity or natural gas demands. Additionally, per the RPS, the proposed project would utilize electricity provided by PG&E that is required to achieve 60 percent renewable energy by 2030. Therefore, the proposed project would be consistent with the City's EAP goals to reduce energy consumption and GHG emissions. The proposed project at Sutter Creek ES would not interfere with implementation of the City's EAP and impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than significant impact.

5.5.4 Mitigation Measures

No mitigation measures are required.

5.5.5 Level of Significance After Mitigation

No mitigation measures are required, and the impacts remain less than significant.

5.5.6 Cumulative Impacts

The areas considered for cumulative impacts to electricity and natural gas supplies are the service areas of PG&E, respectively, described above in Section 5.5.2.4, *Existing Conditions*. Other development projects in the service area would generate increased electricity and natural gas demands. However, as with the proposed project, all projects within the PG&E service areas would be required to comply with the Building Energy Efficiency Standards and CALGreen, which would contribute to minimizing wasteful energy consumption and promoting renewable energy sources. As discussed in Impact 5.5-1, above, construction- and operation-related energy impacts caused by the proposed project would be less than significant and would not be considered inefficient, wasteful, or unnecessary. Therefore, cumulative impacts would be less than significant, and the proposed project's impacts would not be cumulatively considerable.

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5. Environmental Analysis
ENERGY

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5.6 GEOLOGY AND SOILS

This section of the Draft Environmental Impact Report (DEIR) evaluates the proposed project, specifically the site improvements at Sutter Creek ES, Argonaut HS, and Ione Junior HS (see Chapter 3, *Project Description*) and potential impacts to geological and soil resources, paleontological resources, or unique geologic features in Amador County. The analysis in this section is based in part on the following technical report(s):

- Paleontological assessment Memorandum for the Amador County Unified School District Project, ECORP Consulting, August 22, 2023

A complete copy of this study is in the technical appendices to this Draft EIR (Appendix F).

5.6.1 Environmental Setting

Federal, State, and local laws, regulations, plans, or guidelines related to geology, soils, and paleontological resources that are applicable to the proposed project are summarized in this section.

5.6.1.1 REGULATORY BACKGROUND

Federal

Earthquake Hazards Reduction Act

The Earthquake Hazards Reduction Act was enacted in 1997 to "reduce the risks to life and property from future earthquakes in the United States through the establishment and maintenance of an effective earthquake hazards and reduction program." To accomplish this, the act established the National Earthquake Hazard Reduction Program (NEHRP), which refined the description of agency responsibilities, program goals, and objectives. NEHRP's mission includes improved understanding, characterization, and prediction of hazards and vulnerabilities; improvement of building codes and land use practices; risk reduction through post-earthquake investigations and education; development and improvement of design and construction techniques; improvement of mitigation capacity; and accelerated application of research results. The Federal Emergency Management Agency is the lead agency of the program, with several planning, coordinating, and reporting responsibilities. Programs under NEHRP help inform and guide planning and building code requirements such as emergency evacuation responsibilities and seismic code standards.

Paleontological Resources

A variety of federal statutes specifically address paleontological resources. They are generally applicable to a project if that project includes federally owned or federally managed lands or involves a federal agency license, permit, approval, or funding. The first of these, the Antiquities Act of 1906 (54 U.S.C. 320301-320303 and 18 U.S.C. 1866(b)), calls for protection of historic landmarks, historic and prehistoric structures, and other objects of historic or scientific interest—which would include fossils—on federally administered lands. The Antiquities Act established a permit system for disturbing objects of antiquity and set criminal sanctions for violation of requirements. It was extended to specifically apply to paleontological resources by the Federal-Aid Highways Act of 1958. More recent federal statutes that address the preservation of paleontological resources include:

- **National Environmental Policy Act**, which requires consideration of natural aspects of national heritage (Public Law. 91-190, 31 Stat. 852).
- **Federal Land Policy Management Act of 1976** (P.L. 94-579; 90 Stat. 2743) requires that public lands be managed in a way to protect their scientific value.
- **Code of Federal Regulations, Title 40, Section 1508.2** identifies paleontological resources as a subset of scientific resources.

Paleontological Resources Preservation Act

The Paleontological Resources Preservation Act (Title VI, Subtitle D, of the Omnibus Land Management Act of 2009) regulates paleontological resources identified on federal, Native American, or state lands; guides their management and protection; and promotes public awareness and scientific education regarding vertebrate fossils. The act also requires federal agencies to develop plans for inventory, collection, and monitoring of paleontological resources and establishes strong criminal and civil penalties for the removal of scientifically significant fossils on federal lands.

State

California Alquist-Priolo Earthquake Fault Zoning Act

The California Alquist-Priolo Earthquake Fault Zoning Act was signed into state law in 1972 to mitigate the hazard of fault rupture by prohibiting structures for human occupancy across the trace of an active fault. The act was a direct result of the 1971 San Fernando Earthquake, which caused extensive surface ruptures that damaged homes, commercial buildings, and other structures. The act requires the State Geologist (chief administrator of the California Geologic Survey (CGS) to delineate regulatory zones known as "earthquake fault zones" along faults that are "sufficiently active" and "well defined" and to issue and distribute appropriate maps to all affected cities, counties, and state agencies for their use in planning and controlling new or renewed construction. Pursuant to this act, the California Code of Regulations (CCR) Title 14, Section 3603(a) stipulated that structures for human occupancy are not permitted to be placed across the trace of an active fault. The act also prohibits structures for human occupancy within 50 feet of the trace of an active fault unless proven by an appropriate geotechnical investigation and report that the development site is not underlain by active branches of the active fault (14 CCR Section 3603(a)). It further requires that cities and counties withhold development permits for sites within an earthquake fault zone until geologic investigations demonstrate that the sites are not threatened by surface displacement from future faulting (14 CCR Section 3603(d)).

Seismic Hazard Mapping Act

The Seismic Hazard Mapping Act was adopted by the state in 1990 to protect the public from the effects of earthquake hazards other than surface fault rupture, such as strong ground shaking, liquefaction, seismically induced landslides, or other ground failure. The goal of the act is to minimize loss of life and property by identifying and mitigating seismic hazards. The CGS prepares seismic hazard zones maps and provides them to local governments. The maps identify areas susceptible to amplified shaking, liquefaction, earthquake-induced landslides, and other ground failures.

California Building Code

Current law states that every local agency enforcing building regulations, such as cities and counties, must adopt the provisions of the California Building Code (CBC) within 180 days of its publication. The publication date of the CBC is established by the California Building Standards Commission, and the code is under 24 CCR Part 2. The CBC provides minimum standards to protect property and public safety by regulating the design and construction of excavations, foundations, building frames, retaining walls, and other building elements to mitigate the effects of seismic shaking and adverse soil conditions. The CBC contains provisions for earthquake safety based on factors including occupancy type, the types of soil and rock on-site, and the strength of ground shaking with a specified probability at a site. The 2022 CBC took effect on January 1, 2023.

Requirements for Geotechnical Investigations

Requirements for geotechnical investigations are in the CBC's Appendix J, Section J104. Additional requirements for subdivisions requiring tentative and final maps and for other specified types of structures are in California Health and Safety Code Sections 17953 to 17955 and in CBC Section 1802. Testing of samples from subsurface investigations is required, such as from borings or test pits. Studies must be done as needed to evaluate slope stability, soil strength, position and adequacy of load-bearing soils, the effect of moisture variation on load-bearing capacity, compressibility, liquefaction, differential settlement, and expansiveness. CBC Section J106 sets forth requirements for inspection and observation during and after grading.

California Public Resources Code

Requirements for paleontological resource management are included in PRC Division 5, Chapter 1.7, Section 5097.5, which states:

> A person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands.

This statute prohibits the removal, without permission, of any paleontological site or feature. Consequently, local agencies are required to comply with PRC Section 5097.5 for their own activities, including construction and maintenance, as well as for permit actions (e.g., encroachment permits) undertaken by others. PRC Section 5097.5 also establishes the removal of paleontological resources as a misdemeanor and requires reasonable mitigation of adverse impacts to paleontological resources from developments on public (i.e., state, county, city, and district) land.

California Code of Regulations

Title 14, Section 4307: "No person shall destroy, disturb, mutilate, or remove earth, sand, gravel, oil, minerals, rocks, paleontological features, or features of caves."

Regional

Amador County General Plan

The Safety Element of the Amador General Plan includes the following goals and policies that relate to geology and soils:

- **Goal S-4:** Protect people and property from seismic hazards.
- **Policy S-4.1:** Enforce site-specific seismic design category requirements per the California Building Code (CBC) to minimize earthquake damage.
- **Policy S-4.3:** Discourage new construction of structures or improvements in or near a seismic risk area or geologic hazard area unless these projects meet design standards to minimize or eliminate seismic risk.
- **Goal S-5:** Protect people and property from landslides, mudslides, and avalanches.
- **Policy S-5.1:** Use the development review process to lessen the potential for erosion and landslides. Restrict site grading which steepens unstable slopes.
- **Policy S-5.2:** Limit development in areas with high landslide, mudslide, or avalanche susceptibility.

Amador County Municipal Code

- **Chapter 15.40, Erosion Control Ordinance.** All permits issued by the county causing land disturbance shall include erosion control measures except for permits and reclamation plans which are separately reviewed and permitted. Those permits are not limited to conditional use permits, on-site septic system permits, county road encroachment permits, well permits and grading permits. All building permits shall include erosion control measures as part of the building permit. (Ord. 1795 Section 2 (part), 2020)

Local

Jackson General Plan

The Safety Element of the Jackson General Plan (1981) does not contain any policies or actions regarding geology and soils.

The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals, policies, and actions related to energy are outlined here (Jackson 2023).

- **Goal SA-1:** Minimize community exposure to geologic and seismic hazards.
- **Policy SA 1.1:** Require development to reduce risks to life and property associated with earthquakes, liquefaction, erosion, landslides, and unstable soil conditions.

- **Policy SA 1.2:** Ensure that all new development and construction is in conformance with applicable building standards related to geologic and seismic safety.
- **Policy SA 1.3:** Require geotechnical investigations to be completed prior to approval of any public safety or other critical facilities, in order to ensure that these facilities are constructed in a way that mitigates site-specific seismic and/or geologic hazards.
- **Policy SA 1.4:** Development in areas subject to unstable soil and/or geologic conditions shall be reviewed by qualified engineers and/or geologists prior to development in order to ensure the safety and stability of all new construction.
- **Policy SA 1.5:** Require an erosion and sediment control plan prepared by a civil engineer, or other professional who is qualified to prepare such a plan, as part of any grading permit application for new development. The erosion and sediment control plan shall delineate measures to appropriately and effectively minimize soil erosion and sedimentation.
- **Policy SA 1.6:** Prevent land subsidence and maintain adequate groundwater supplies.
- **Policy SA 2.6:** Ensure that any development activity that requires a grading permit does not impact adjacent properties, local creeks, and storm drainage systems by designing and building the site to drain properly to minimize drainage issues and erosion.
- **Policy LU 2.1:** Control land grading to minimize the potential for erosion, landsliding, and other forms of land failure, as well as to limit the potential negative aesthetic impact of excessive modification of natural landforms.

Jackson Municipal Code

- **17.40.040.7 Grading Design Plan.** For the efficient use of water, grading of a project site shall be designed to minimize soil erosion, runoff, and water waste. A grading plan shall be submitted as part of the Landscape Documentation Package. A comprehensive grading plan prepared by a civil engineer for other local agency permits satisfies this requirement.

Ione General Plan

- **Policy NS-4.1:** Support efforts by federal, state, and local jurisdictions to investigate local seismic and geologic hazards and support those programs that effectively mitigate seismic and safety hazards.
- **Action NS-4.1.1:** Continue to implement the California Building Code to ensure that structures meet all applicable seismic standards.
- **Policy NS-4.2:** Ensure that new structures are protected from damage caused by geologic and/or soil conditions to the greatest extent feasible.

- **Action NS-4.2.1:** Continue to require that all new construction projects complete a geotechnical report or conduct other appropriate analysis to determine the soils characteristics and associated development constraints and impose appropriate measures for geologically sensitive areas.

Ione Municipal Code

- **18.16.120, Grading Design Plan.** For the efficient use of water, grading of a project site shall be designed to minimize soil erosion, runoff, and water waste. A grading plan shall be submitted as part of the landscape documentation package. A comprehensive grading plan prepared by a civil engineer for other local agency permits satisfies this requirement.

Sutter Creek General Plan

- **Policy COS-1.8.1:** Maintain a grading ordinance that will minimize excessive grading and set forth specific standards and regulations beyond those contained in California Building Code (CBC).
- **Policy COS-1.8.2:** The City shall include, adopt, implement, and enforce erosion control guidelines within the City of Sutter Creek Development Standards.
- **Policy S-1.2.1:** Site-specific soils investigations will be required for construction projects when and wherever there is concern for soils-related hazards.
- **Policy S-1.2.4:** Site-specific soils investigations will be required to evaluate the health risk from proposed projects within or adjacent to mine waste materials. Schools, day care centers, hospitals, and residential subdivisions should not be located in areas where hazardous materials are present in mine waste materials.

5.6.1.2 EXISTING CONDITIONS

Geologic Setting

Argonaut High School

Argonaut HS is on the western slope foothills of the Sierra Nevada Geomorphic Province of California. The Sierra Nevada is characterized by its high rugged eastern face, gentle western slopes, and high crest modified by glacial sculpting.

More locally, Amador County is on the eastern edge of the San Joaquin Valley—a broad, flat valley bounded by the coastal ranges to the west and the Sierra Nevada to the east (Sutter Creek 2019). The elevation in Amador County ranges from approximately 9,000 feet above mean sea level (amsl) to approximately 250 feet amsl. More locally, the City of Jackson Creek contains elevations from approximately 1550 amsl to approximately 1,150 amsl.

The Argonaut HS campus is on the late Jurassic Goat Hill member of the Logtown Ridge Formation (Jlg) with a soil composition of Auburn-Argonaut very rocky silt loams (AxD) (CDC 2019; USDA 2023).

Ione Junior High School

Ione Junior HS is at the Mother Lode belt within the Sierra Nevada Geomorphic Province of California, abutting the Great Valley Geomorphic Province (Ione 2009). The Great Valley is characterized as a trough for sedimentary deposits since the Jurassic period.

Amador County ranges from approximately 9,000 feet amsl to approximately 250 feet amsl. More locally, the City of Ione is in the Ione Valley, which is relatively flat with elevations from approximately 250 feet amsl in the southwest to 600 feet amsl in the northeast. The area has notable geologic formations of the Amador Group, Alluvium, the Ione Formation. Ione Junior HS is on the Eocene Ione Formation (Ei) with a soil composition of Red Bluff-Mokelumne complex (RbD) and Mokelumne soils (Mt) (CDC 2015b; USDA 2023).

Sutter Creek Elementary School

The Sutter Creek ES is on the western foothills of the Sierra Nevada Geomorphic Province (CGS 2002). More locally, Sutter Creek is on the eastern edge of the San Joaquin Valley (Sutter Creek 2019). The elevation in Amador County ranges from approximately 9,000 amsl to approximately 250 amsl. More locally, the City of Sutter Creek contains elevations from approximately 1556 amsl to approximately 1,200 amsl (Sutter Creek 2019) The City of Sutter Creek has notable geologic formations of the Amador Group (metamorphosed volcanic rock, basic schist, meta-andesite and conglomerate) to the west, the Mariposa Formation (slate and greywacke) to the north and east, and the Mehrten Formation (andesite breccia and conglomerates) to the southeast. Sutter Creek ES is in the late Jurassic Pokerville Member of the Logtown Ridge Formation (Jlp) with a soil composition of Auburn very rocky silt loam (AsD) (USGS 1975; USDA 2023).

Faulting and Seismic Hazard

Figure 5.6-1, *Fault Map*, shows the known faults in Amador County, including the three project sites.

Argonaut High School

Faults near the project site at Argonaut HS include the Bear Mountain Fault Zone approximately 2 miles west, an unnamed fault system 0.42 mile northwest, an unnamed fault trace 1 mile northeast, and the Melones fault zone 1.10 miles northeast of Argonaut HS. The Argonaut HS and the surrounding area are not within a State-designated earthquake fault zone (CDC 2015a).

Ione Junior High School

Faults near the project site at Ione Junior HS include the Ione fault approximately 1.60 miles southeast, the Bear Mountain Fault Zone 2.20 miles east, and an unnamed fault trace 4 miles east of Ione Junior HS. Ione Junior HS and the surrounding area is not within a State-designated earthquake fault zone (CDC 2015a).

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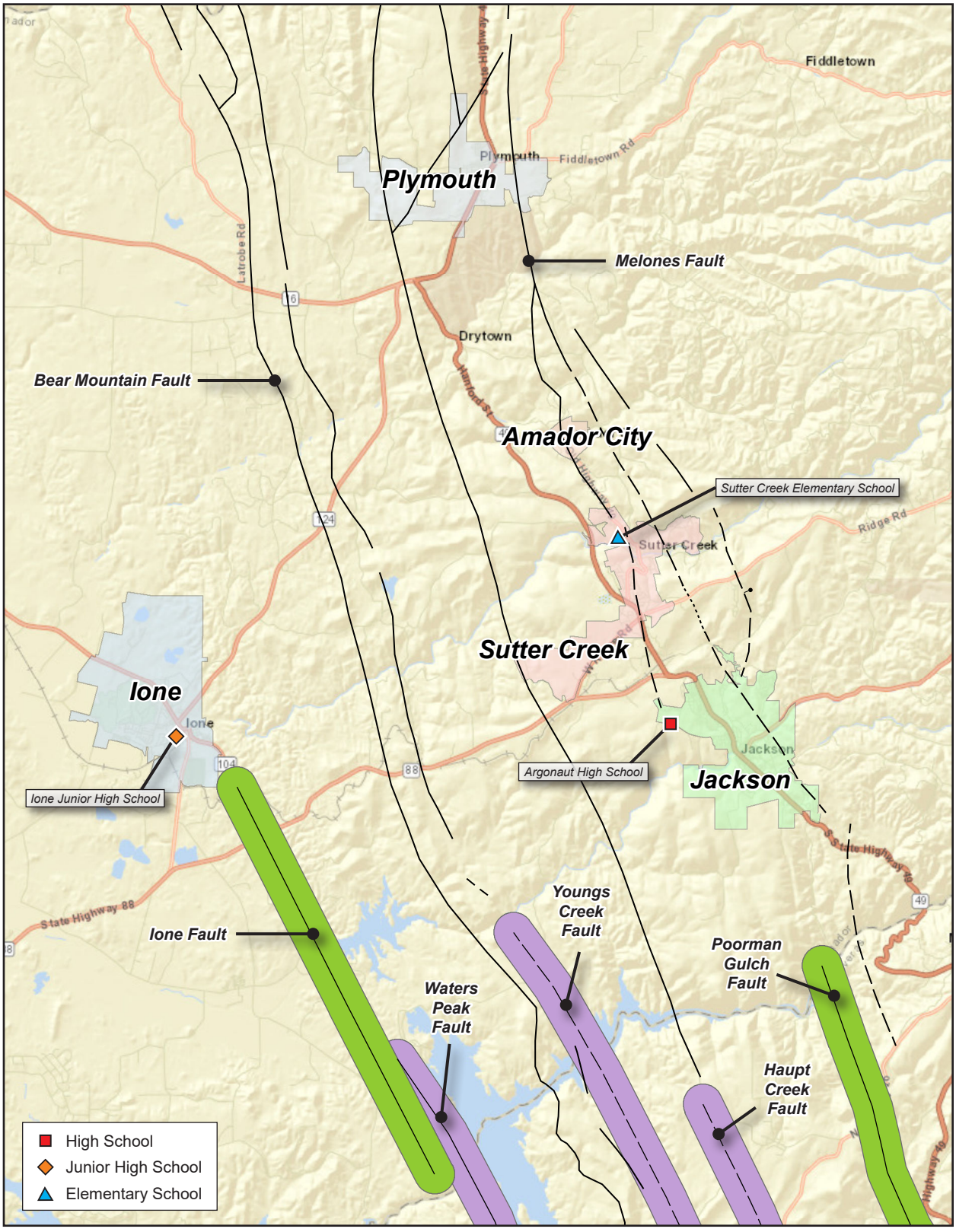
Sutter Creek Elementary School

Faults near the project site at Sutter Creek ES include the Bear Mountain Fault Zone approximately 5 miles west, an unnamed fault system 2 miles west, an unnamed fault trace 0.50 mile south, and the Melones fault zone 0.10 mile north of the Sutter Creek ES. The Sutter Creek ES and the surrounding area is not within a State-designated earthquake fault zone (CDC 2015a).

Figure 5.6-1 - Fault Map



Source: Generated using ArcMap 2023; CA Dept of Conservation 2023.

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GEOLOGY AND SOILS

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Geologic Hazards

Expansive Soils

Expansive soils generally consist of clays that can shrink and swell with changes in moisture content. Movement of soils in response to shrinkage and swelling has the potential to impact near-surface improvements such as lightly loaded foundations and floor slabs.

Argonaut High School

Based on data from the United States Department of Agriculture (USDA) Soil Data Explorer, near-surface soils are anticipated to have low expansion potential at the Argonaut HS project site (USDA 2023).

Ione Junior High School

Based on data from the USDA Soil Data Explorer, near-surface soils are anticipated to have low to moderate expansion potential at the Ione ES project site (USDA 2023).

Sutter Creek Elementary School

Based on data from the USDA Soil Data Explorer, near-surface soils are anticipated to have low expansion potential at the Sutter Creek ES project site (USDA 2023).

Collapsible Soils

Collapsible soils generally consist of relatively dry, low-density materials that become weaker and more compressible with the addition of water or excessive loading.

Argonaut High School

Due to the very rocky silt loams, and shallow, unweathered bedrock approximately 14 inches below the surface, the potential for collapse of soils at the project site at Argonaut HS is considered very low (USDA 2023).

Ione Junior High School

Due to the gravelly loam and the shallow unweathered Ione Formation at approximately 39 inches below the surface, the potential for collapse of soils at the project site at Ione Junior HS is considered very low (USDA 2023).

Sutter Creek Elementary School

Due to the rocky silt loam, and shallow unweathered bedrock at approximately 14 inches below the surface, the potential for collapse of soils at the project site at Sutter Creek ES is considered very low (USDA 2023).

Subsidence

Subsidence occurs when a large portion of land sinks, usually due to the withdrawal of groundwater, oil, or natural gas.

Argonaut High School

The soils below Argonaut HS contain silt loam; however, the unweathered bedrock is approximately 14 inches below the surface. Thus, there is low potential for subsidence. The project site at Argonaut HS is not in an area of known ground subsidence (USGS 2023). No large-scale extraction of groundwater, gas, oil, or geothermal energy has occurred, is occurring now, or is planned in the future at or near the project site. In addition, the consolidated nature of the shallow bedrock is not conducive to subsidence. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the project site.

Ione Junior High School

The soils below Ione Junior HS, including the project site, contain gravelly sandy loam, clay, sandy clay loam, gravelly loam, loam, and gravelly clay; however, the project site is not in an area of known ground subsidence (USGS 2023). No large-scale extraction of groundwater, gas, oil, or geothermal energy has occurred, is occurring now, or is planned in the future at or near the site. In addition, the consolidated nature of the shallow bedrock is not conducive to subsidence. There is little or no potential for ground subsidence due to withdrawal of fluids or gases at the project site at Ione Junior HS.

Sutter Creek Elementary School

The soils below Sutter Creek ES contain silt loam; however, the unweathered bedrock is approximately 14 inches below the surface so there is low potential for subsidence. The project site at Sutter Creek ES is not in an area of known ground subsidence (USGS 2023). No large-scale extraction of groundwater, gas, oil, or geothermal energy has occurred, is occurring now, or is planned in the future at or near the project site. In addition, the consolidated nature of the shallow bedrock is not conducive to subsidence. There appears to be little or no potential for ground subsidence due to withdrawal of fluids or gases at the project site.

Paleontological Resources

Paleontological resources are the fossilized remains of organisms from prehistoric environments found in geologic strata. These are valued for the information they yield about the earth and its past ecological settings. There are two types of resources: vertebrate and invertebrate. These resources are found in geologic strata conducive to their preservation, typically sedimentary formations. Paleontological sites are areas that show evidence of prehuman activity. Often, they are simply small outcroppings visible on the surface or sites encountered during grading. Potentially sensitive areas for the presence of paleontological resources are based on the underlying geologic formation.

Amador County is located in the Sierra Nevada geomorphic province, between the Sierra Nevada foothills and the Sacramento Valley. Amador County, along with the rest of the Sierra foothills, is underlain by folded and faulted metasedimentary and metavolanic rocks of Paleozoic and Mesozic ages (ECORP 2023).

Argonaut High School

The Jackson General Plan and the Amador County General Plan do not discuss the potential for or existence of paleontological resources. The predominant geologic formation within Argonaut HS is Logtown Ridge

Formation of the Amador Group (ECORP 2023). The Amador Group is Middle and Upper Jurassic in age and consists of metamorphosed volcanic rock, basic schist, meta-andesite, and conglomerate.

A search of the UC Museum of Paleontological Specimens database concluded that 24 paleontological resources within Amador County were recorded, which includes a partial skull fragment and humeri from a Pleistocene bear (Ursus) and invertebrates including cephalopod, bivalve, and gastropods from the Eocene (UCMP 2023; ECORP 2023). However, these fossils were recovered north of Pine Grove, California (ECORP 2023). Additionally, paleontological resources such as fossils have previously been identified within the Goat Hill Member of the Logtown Ridge Formation. The paleontological assessment concluded that no significant paleontological resources have been found within the vicinity of Argonaut HS (ECORP 2023). Although unlikely due to previous ground disturbing activities, paleontological resources may exist beneath Argonaut HS.

Ione Junior High School

The Ione General Plan and the Amador County General Plan do not discuss the potential for or existence of paleontological resources. The predominant geologic formation within Ione Junior HS is Ione Formation (ECORP 2023). The area surrounding Ione Junior HS is characterized by the Ione Basin, a geophysical province 30 miles long and 4-to-7 miles wide whose primary surface exposures include sedimentary rocks of the Eocene Ione Formation (approximately 49 to 45 million years old) (ECORP 2023). The Ione Formation is of importance due to its depositional environment. The formation was deposited in floodplain, estuaries, lagoons, deltas, marshy-swamps, and marine waters. Due to the predominantly nearshore environments defined by the sedimentary rocks of the Ione Formation, it has been found to contain well-preserved fossil plants, fossil logs, lignite, and fossil peat (ECORP 2023).

A search within the UC Museum of Paleontological Specimens database concluded that 24 paleontological resources within Amador County were recorded, which include a partial skull fragment and humeri from a Pleistocene bear (Ursus) and invertebrates including cephalopod, bivalve, and gastropods from the Eocene (UCMP 2023; ECORP 2023). The paleontological assessment found seven *Pinus* sp. scale fragments within the Eocene Ione formation (ECORP 2023). Additionally, fossil flora have been uncovered within the Ione formation outside of Amador County and is known as one of the great fossil leaf-bearing districts in California. Although unlikely as a result of previous ground disturbing activities, due to the presence of a fossil plant bearing district in the vicinity of Ione Junior HS, paleontological resources may exist beneath Ione Junior HS.

Sutter Creek Elementary School

The predominant geologic formation within Sutter Creek ES is Logtown Ridge Formation of the Amador Group (ECORP 2023). The Amador Group is Middle and Upper Jurassic in age and consists of metamorphosed volcanic rocks, basic schist, meta-andesite and conglomerate.

The Sutter Creek General Plan and the Amador County General Plan do not discuss the potential for or existence of paleontological resources. A search within the UC Museum of Paleontological Specimens database concluded that 24 paleontological resources within Amador County were recorded, which includes a partial skull fragment and humeri from a Pleistocene bear (Ursus) and invertebrates including cephalopod, bivalve, and gastropods from the Eocene (UCMP 2023; ECORP 2023). A paleontological assessment of Sutter Creek

ES concluded that no significant paleontological resources have been found within the vicinity of Sutter Creek ES (ECORP 2023). Although unlikely due to previous ground disturbing activities, paleontological resources may exist beneath Sutter Creek ES.

5.6.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

G-1 Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:

- i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. (Refer to Division of Mines and Geology Special Publication 42.)
- ii) Strong seismic ground shaking.
- iii) Seismic-related ground failure, including liquefaction.
- iv) Landslides.

G-2 Result in substantial soil erosion or the loss of topsoil.

G-3 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.

G-4 Be located on expansive soil, as defined in Table 18-1B of the Uniform building Code (1994), creating substantial direct or indirect risks to life or property.

G-5 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.

G-6 Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

5.6.3 Environmental Impacts

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.6-1: The occupants at project sites at Argonaut HS, Ione Junior HS, and Sutter Creek ES may be subject to ground shaking typical of Northern California; however, project development would not subject people or structures to rupture, seismic-related ground failure including liquefaction, and landslides. [Threshold G-1 (i), (ii), (iii), (iv)]

Argonaut High School Site Improvements

Multiple faults are near the Argonaut HS project site—the Bear Mountain Fault Zone approximately 2 miles west, an unnamed fault system 0.42 mile northwest, an unnamed fault trace 1 mile northeast, and the Melones fault zone 1.10 miles northeast. An active fault as defined by the Alquist-Priolo Earthquake Fault Act is one that has ruptured in the last 11,000 years (CDC 2023a). None of the faults in the vicinity are considered active faults, though portions of the Bear Mountain Fault Zone are potentially active. The nearest Alquist-Priolo Earthquake Fault Zone is the Clayton Fault, approximately 70 miles away (CDC 2015a). Based on this distance, the Clayton Fault would not have the potential to rupture at the project site, and impacts would be **less than significant.**

As is the case with most locations in Northern California, the project site at Argonaut HS is in a seismically active area. The type and magnitude of seismic hazards that may affect the project site are dependent on both the distance to active faults and the intensity and duration of the seismic event. The Argonaut HS project site may experience moderate ground shaking caused by earthquakes on active, regional faults in the future. Due to the distance, risk is low for damage, injury, or death from strong seismic ground shaking. Additionally, prior to issuance of any future grading permit for project development, a geotechnical report would be required and reviewed by the California Geological Survey (CGS) and Division of State Architects (DSA). The geotechnical report would include requirements pertaining to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations. Development of the proposed project would be required to implement the design recommendations outlined in the geotechnical report. With adherence to the CBC and the design requirements in the geotechnical report, impacts related to potential ground-shaking would be **less than significant**.

Based on the distance from significant faults that could cause shaking strong enough for liquefaction, liquefaction would not be a significant hazard at the project site (CDC 2015a). Based on the geology, the lack of any mapped existing landslides, and the gentle topography across the project site, the potential for landslides is considered low (CDC 2019). In addition, the subsurface soil consists primarily of rocky silt loam and bedrock materials. Therefore, the potential for liquefaction and landslides is low at this project site, and impacts are **less than significant**.

Ione Junior High School Site Improvements

Multiple faults are near the Ione Junior HS project site—the Ione Fault approximately 1.60 miles southeast, the Bear Mountain Fault Zone 2.20 miles east, and an unnamed fault trace 4 miles east. An active fault as defined by the Alquist-Priolo Earthquake Fault Act is one that has ruptured in the last 11,000 years (CDC 2023a). None of the faults in the vicinity of the project site at Ione Junior HS are considered active faults, but the Ione Fault and portions of the Bear Mountain Fault Zone are potentially active. The nearest Alquist-Priolo Earthquake

Fault Zone is the Clayton Fault approximately 62 miles away (CDC 2015a). Based on this distance, the Clayton Fault would not have the potential to rupture at the project site, and impacts would be **less than significant.**

As is the case with most locations in Northern California, the project site is in a seismically active area. The type and magnitude of seismic hazards that may affect the project site are dependent on both the distance to active faults and the intensity and duration of the seismic event. The Ione Junior HS project site may experience moderate ground shaking caused by earthquakes on active, regional faults in the future. Due to the distance, risk of damage, injury, or death from strong seismic ground shaking is low. Additionally, prior to issuance of any future grading permit for project development, a geotechnical report would be required and reviewed by CGS and DSA. The geotechnical report would include requirements pertaining to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations. The proposed project would be required to implement the geotechnical design recommendations in the geotechnical report. After adherence to the CBC and the design requirements in the geotechnical report, impacts related to potential ground-shaking would be **less than significant**.

Based on the distance from significant faults that could cause shaking strong enough for liquefaction, liquefaction would not be a significant hazard at the project site (CDC 2015a). Based on the geology, the lack of any mapped existing landslides, and the gentle topography across the project site, the potential for landslides is considered low (CDC 2015a). Therefore, the potential for liquefaction and landslides is low at this project site, and impacts are **less than significant**.

Sutter Creek Elementary School Site Improvements

Multiple faults near the Sutter Creek ES project site include the Bear Mountain Fault Zone approximately 5 miles west, an unnamed fault system 2 miles west, an unnamed fault trace 0.50 mile south, and the Melones Fault Zone 0.10 mile north. None of the faults in the vicinity of the project site at Sutter Creek ES are considered active faults—one that has ruptured in the last 11,000 years—but portions of the Bear Mountain Fault Zone are potentially active (CDC 2023a). The nearest Alquist-Priolo Earthquake Fault Zone is the Clayton Fault approximately 65 miles away (CDC 2015a), too far to cause surface rupture at the project site, and impacts would be **less than significant.**

As is the case with most of Northern California, the project site is in a seismically active area. The type and magnitude of seismic hazards depend on the distance to active faults and the intensity and duration of the seismic event. The Sutter Creek ES project site may experience moderate ground shaking caused by earthquakes on active, regional faults in the future. Due to the distance, risk of damage, injury, or death from strong seismic ground shaking is low. Additionally, prior to issuance of any future grading permit for project development, a geotechnical report would be required and reviewed by the CGS and DSA. The geotechnical report would include requirements pertaining to structural design and construction recommendations for earthwork, grading, slopes, foundations, pavements, and other necessary geologic and seismic considerations. The proposed project would be required to implement the design recommendations in the geotechnical report. Adherence to the CBC and the design requirements in the geotechnical report would render impacts related to potential ground-shaking **less than significant**.

Based on the distance from significant faults that could cause shaking strong enough for liquefaction, liquefaction would not be a significant hazard at the project site (CDC 2015a). Based on the geology, the lack of any mapped existing landslides, and the gentle topography across the project site, the potential for landslides is considered low (USGS 1975). In addition, the subsurface soil consists primarily of rocky silt loam and bedrock materials. Therefore, the potential for liquefaction and landslides is low at this project site, and impacts are **less than significant**.

Level of Significance Before Mitigation: Less than Significant Impact.

Impact 5.6-2: The proposed project would not result in substantial soil erosion or loss or topsoil. [Thresholds G-2]

Erosion is a normal and inevitable geologic process whereby earthen materials are loosened, worn away, decomposed, or dissolved; removed from one place; and transported to another.

Argonaut High School Site Improvements

The project site contains a west-to-east-inclined slope to a relatively flat pad, which is where the development of the new building would occur, thus decreasing the project's potential to accelerate erosion. The Argonaut HS project site is developed with existing pavement, disturbed land, and landscaping. Implementation of the proposed project would require utility trenching and earthwork, which include grading for proper base and slope for the new classroom building, portable classrooms, and new driveways. The proposed project does not contain any subterranean levels and would not require extensive excavation that could expose more soils to erosion. Construction of the proposed project would be required to comply with existing State and local laws regulating construction activities—the CBC would minimize soil erosion. Therefore, the Argonaut HS project would not result in a substantial soil erosion or loss of topsoil, and a **less than significant impact** would occur.

Ione Junior High School Site Improvements

The project site contains relatively flat terrain, which decreases the project's potential to accelerate erosion. The Ione Junior HS project site is developed with existing pavement, disturbed land, and landscaping. Implementation of the proposed project would require utility trenching and limited earthwork, which include grading for proper base and slope for the new classroom buildings, preschool playground and play structures, and roundabout for internal vehicle circulation. The proposed project does not contain any subterranean levels and would not require extensive excavation that could expose more soils to erosion. Construction of the proposed project would be required to comply with existing State and local laws regulating construction activities, including the CBC, to minimize soil erosion. Therefore, the Ione Junior HS project would not result in a substantial soil erosion or loss of topsoil, and a **less than significant impact** would occur.

Sutter Creek Elementary School Site Improvements

The project site contains generally flat terrain, which decreases the project's potential to accelerate erosion. The Sutter Creek ES project site is developed with a paved blacktop (pavement), disturbed land, and landscaping.

Implementation of the proposed project would require utility trenching and earthwork, which include grading for proper base and slope for the new classroom building and lunch shelter. The proposed project does not contain any subterranean levels and would not require extensive excavation that could expose more soils to erosion. Construction of the proposed project would be required to adhere to existing State and local laws and policies regulating construction activities, including the CBC and Policy COS-1.8.2 of the Sutter Creek General Plan, to minimize soil erosion. Therefore, the Sutter Creek ES project would not result in a substantial soil erosion or loss of topsoil, and a **less than significant impact** would occur.

Level of Significance Before Mitigation: Less than Significant Impact.

Impact 5.6-3: Site improvements at Argonaut HS, Ione Junior HS, and Sutter Creek ES would not result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse; are not located on expansive soils; and would not create a direct or indirect risk to life and property. [Thresholds G-3 and G-4]

As discussed in Impact 5.6-1, impacts from liquefaction and landslides are less than significant for the three project sites at Argonaut HS, Ione Junior HS, and Sutter Creek ES. Furthermore, because the potential for seismic-related liquefaction is low at the project sites, the corresponding potential for lateral spreading during liquefaction is also considered low.

As mentioned under Section 5.6.1.2, the potential for expansive soils and the collapse of soils at the Sutter Creek ES, Argonaut HS, and Ione Junior HS project sites is considered low. Additionally, as mentioned under Section 5.6.1.2, the three project sites would have little or no potential for ground subsidence due to withdrawal of fluids or gases based on the lack of oil or gas production in the area and the consolidated nature of the shallow bedrock.

Therefore, impacts related to unstable soils and expansive soils would be **less than significant**.

Level of Significance Before Mitigation: Less than Significant Impact.

Impact 5.6-4: The proposed project would not include the installation of septic tanks. [Threshold G-5]

Argonaut High School Site Improvements

The Argonaut HS project site has sewer connections maintained by the City of Jackson wastewater system (AWA 2023). The proposed new building at Argonaut HS would connect to the existing sewer lines that serve Argonaut HS. The proposed project would not use alternative wastewater disposal systems such as septic tanks, and **no impact** would occur.

Level of Significance Before Mitigation: No Impact.

Ione Junior High School Site Improvements

The Ione ES project site has sewer connections maintained by the City of Ione wastewater system (AWA 2023). The proposed classrooms, restrooms, and conversion of science labs to kindergarten classrooms would connect

to the existing sewer lines that serve Ione Junior HS. The proposed project would not use alternative wastewater disposal systems such as septic tanks, and **no impact** would occur.

Sutter Creek Elementary School Site Improvements

The Sutter Creek ES project site has sewer connections maintained by the City of Sutter Creek wastewater system (AWA 2023). The proposed classroom building would connect to the existing sewer lines that serve the Sutter Creek ES. The proposed project would not use alternative wastewater disposal systems such as septic tanks, and **no impact** would occur.

Level of Significance Before Mitigation: No impact.

Impact 5.6-4: The proposed project would not directly or indirectly destroy a unique geologic feature, and with the incorporation of Mitigation Measure GEO-1, the proposed project would not directly or indirectly destroy a paleontological resource. [Threshold G-6]

Argonaut High School Site Improvements

The project site at Argonaut HS is developed with paved surfaces, landscaping, and disturbed land. As such, it is unlikely for paleontological resources to exist due to the disturbed nature of the site. Additionally, as mentioned in Section 5.6.1.2, *Existing Conditions*, above, the geological formation that the site is underlain is not known to contain significant paleontological resources. In the unlikely event that construction activities encounter paleontological resources, the proposed project shall comply with PRC, Chapter 1.7, Sections 5097.5, which prohibits persons from knowingly and willfully excavating upon, or removing, destroying, injuring, or defacing any vertebrate paleontological site, including fossilized footprints or other paleontological feature. Because the potential exists for unearthing paleontological resources, implementation of the proposed project at Argonaut HS would be **potentially significant**.

Ione Junior High School Site Improvements

The project site at Ione JHS is developed with paved surfaces, landscaping, and disturbed land. As such, it is unlikely for paleontological resources to exist due to the disturbed nature of the site.

However, as mentioned in Section 5.6.1.2, *Existing Conditions*, above, the geological formation that the site is underlain, Ione Formation, is recognized as one of the great fossil leaf-bearing districts in California. As such, ground disturbing activities have the potential to uncover paleontological resources at the site. In the unlikely event that construction activities encounter paleontological resources, the proposed project shall comply with PRC, Chapter 1.7, Sections 5097.5, which prohibits persons from knowingly and willfully excavating upon, or removing, destroying, injuring, or defacing any vertebrate paleontological site, including fossilized footprints or other paleontological feature. Because the potential exists for unearthing paleontological resources, implementation of the proposed project at Ione JHS would be **potentially significant**.

Sutter Creek Elementary School Site Improvements

The project site at Sutter Creek ES is developed with paved surfaces, landscaping, and disturbed land. As such, it is unlikely for paleontological resources to exist due to the disturbed nature of the site. Additionally, as mentioned in Section 5.6.1.2, *Existing Conditions*, above, the geological formation that the site is underlain is not known to contain significant paleontological resources. In the unlikely event that construction activities encounter paleontological resources, the proposed project shall comply with PRC, Chapter 1.7, Sections 5097.5, which prohibits persons from knowingly and willfully excavating upon, or removing, destroying, injuring, or defacing any vertebrate paleontological site, including fossilized footprints or other paleontological feature. Because the potential exists for unearthing paleontological resources, implementation of the proposed project at Sutter Creek ES would be **potentially significant**.

Level of Significance Before Mitigation: Potentially Significant.

5.6.4 Mitigation Measures

Impact 5.6-4

GEO-1 Prior to earthwork activities, the District shall retain a qualified paleontological monitor to monitor earthwork activities at Ione Junior HS. The qualified paleontological monitor shall be equipped to salvage fossils and samples of sediments of potential paleontological resources. In the event that a paleontological resource is unearthed, a paleontological monitoring plan shall be implemented to inform the District and construction personnel of monitoring and implementing protocols during ground disturbance. Groundwork around the find shall halt until the qualified paleontological monitor assesses the resource. The paleontological monitor may establish a protected buffer around the find for the duration of recovery of the resource and has authorized the resumption of construction activities.

Recovered specimens shall be prepared to a point of identification and permanent preservation, including washing of sediments to recover small invertebrates and vertebrates. Found specimens shall be curated into the UC Museum of Paleontological Specimens or other responsible public or private institution with a suitable repository willing to and capable of accepting and housing the resource. If no museum or repository is willing to accept the resource, it shall be considered the property of the District and may be stored, disposed of, transferred, exchanged, or otherwise handled by the County at its discretion.

Upon completion of earthwork activities and if paleontological resources are found, the qualified paleontological monitor shall prepare a report of paleontological resource findings within 30 days of earthwork completion. The report shall append itemized inventory of recovered resources, documentation of each locality, and interpretation of recovered fossils. The report and inventory, when submitted and approved by the District, will signify completion of the program to mitigate impacts to paleontological resources.

At Argonaut HS and Sutter Creek ES, the qualified paleontologist shall conduct a spot check of construction activities once ground disturbance begins.

5.6.5 Level of Significance After Mitigation

The mitigation measure (GEO-1) would reduce potential impacts associated with the accidental discovery of paleontological resources to a less than significant level. Therefore, no significant impacts relating to geology and soils have been identified remain after the implementation of Mitigation Measure GEO-1.

5.6.6 Cumulative Impacts

The cumulative setting for geologic resources is typically site specific. As discussed previously, implementation of the proposed project would not result in significant impacts related to geology and soils. Although the project sites may be subject to ground shaking typical of Northern California, after compliance with the CBC and the recommendations in a site-specific geotechnical report, impacts related to geological hazards would be less than significant.

The development projects in the County would be subject to the same federal, state, and local regulations. Since impacts associated with geology and soils are by their nature focused on specific sites or areas, the less-than-significant impacts within the project sites would not contribute to a cumulative increase in hazards in the immediate vicinity of the project sites. Similarly, impacts to paleontological resources are considered site-specific, and the project's proposed mitigation would ensure impacts from the proposed project are reduced to less than significant. Therefore, the proposed project would not contribute to a larger cumulative impact. Cumulative impacts associated with geology and soils would be less than significant.

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5. Environmental Analysis
GEOLOGY AND SOILS

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5.7 GREENHOUSE GAS EMISSIONS

This chapter evaluates the potential for the proposed project to cumulatively contribute to greenhouse gas (GHG) emissions impacts. Because no single project is large enough individually to result in a measurable increase in global concentrations of GHG emissions, global warming impacts of a project are considered on a cumulative basis.

Amador County is in the Amador Air District, which does not have adopted CEQA thresholds for air quality or greenhouse gas emissions. Therefore, this chapter is based on the methodology recommended by the Sacramento Metropolitan Air Quality Management District (SMAQMD) in lieu of Amador County–specific guidance. Transportation sector emissions are based on trip generation provided by Kittelson & Associates. GHG emissions modeling was conducted for the maximum development scenario (Argonaut HS Site Improvements) using the California Emissions Estimator Model (CalEEMod), version 2022.1; modeling is in Appendix C, *Air Quality and Greenhouse Gas Modeling*, of this Draft Environmental Impact Report (EIR).

Terminology

The following are definitions for terms used throughout this section.

- **Greenhouse gases (GHG).** Gases in the atmosphere that absorb infrared light, thereby retaining heat in the atmosphere and contributing to a greenhouse effect.
- **Global warming potential (GWP).** Metric used to describe how much heat a molecule of a GHG absorbs relative to a molecule of carbon dioxide (CO_2) over a given period of time (20, 100, and 500 years). CO_2 has a GWP of 1.
- **Carbon dioxide-equivalent (CO_2e)**. The standard unit to measure the amount of GHGs in terms of the amount of CO_2 that would cause the same amount of warming. CO_2e is based on the GWP ratios between the various GHGs relative to CO_2.
- **$MTCO_2e$.** Metric ton of CO_2e.
- **$MMTCO_2e$.** Million metric tons of CO_2e.

5.7.1 Environmental Setting

5.7.1.1 GREENHOUSE GASES AND CLIMATE CHANGE

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

hydrofluorocarbons, perfluorocarbons, and chlorofluorocarbons (IPCC 2001).[1,2] The major GHGs applicable to the Proposed Project are briefly described.

- **Carbon dioxide (CO_2)** enters the atmosphere through the burning of fossil fuels (oil, natural gas, and coal), solid waste, trees and wood products, and respiration, and also as a result of other chemical reactions (e.g., manufacture of cement). Carbon dioxide is removed from the atmosphere (sequestered) when it is absorbed by plants as part of the biological carbon cycle.

- **Methane (CH_4)** is emitted during the production and transport of coal, natural gas, and oil. Methane emissions also result from livestock and other agricultural practices and from the decay of organic waste in landfills and water treatment facilities.

- **Nitrous oxide (N_2O)** is emitted during agricultural and industrial activities as well as during the combustion of fossil fuels and solid waste.

- **Fluorinated gases** are synthetic, strong GHGs that are emitted from a variety of industrial processes. Fluorinated gases are sometimes used as substitutes for ozone-depleting substances. These gases are typically emitted in smaller quantities, but because they are potent GHGs, they are sometimes referred to as high global-warming-potential (GWP) gases.

    - *Chlorofluorocarbons (CFCs*) are GHGs covered under the 1987 Montreal Protocol and used for refrigeration, air conditioning, packaging, insulation, solvents, or aerosol propellants. Since they are not destroyed in the lower atmosphere (troposphere, stratosphere), CFCs drift into the upper atmosphere where, given suitable conditions, they break down ozone. These gases are also ozone-depleting gases and are therefore being replaced by other compounds that are GHGs covered under the Kyoto Protocol.

    - *Perfluorocarbons (PFCs)* are a group of human-made chemicals composed of carbon and fluorine only. These chemicals (predominantly perfluoromethane [CF_4] and perfluoroethane [C_2F_6]) were introduced as alternatives, along with HFCs, to the ozone-depleting substances. In addition, PFCs are emitted as by-products of industrial processes and are used in manufacturing. PFCs do not harm the stratospheric ozone layer, but they have a high global warming potential.

    - *Sulfur Hexafluoride (SF_6)* is a colorless gas soluble in alcohol and ether, slightly soluble in water. SF_6 is a strong GHG used primarily in electrical transmission and distribution systems as an insulator.

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1 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 because it is considered part of the feedback loop rather than a primary cause of change.

2 Black carbon contributes to climate change both directly, by absorbing sunlight, and indirectly, by depositing on snow (making it melt faster) and by interacting with clouds and affecting cloud formation. Black carbon is the most strongly light-absorbing component of particulate matter (PM) emitted from burning fuels such as coal, diesel, and biomass. The share of black carbon emissions from transportation is dropping rapidly and is expected to continue to do so between now and 2030 as a result of California's air quality programs. The remaining black carbon emissions will come largely from woodstoves/fireplaces, off-road applications, and industrial/commercial combustion. However, state and national GHG inventories do not include black carbon due to ongoing work resolving the precise global warming potential of black carbon. Guidance for CEQA documents does not yet include black carbon.

- ***Hydrochlorofluorocarbons (HCFCs)*** contain hydrogen, fluorine, chlorine, and carbon atoms. Although ozone-depleting substances, they are less potent at destroying stratospheric ozone than CFCs. They have been introduced as temporary replacements for CFCs and are also GHGs.
- ***Hydrofluorocarbons (HFCs)*** contain only hydrogen, fluorine, and carbon atoms. They were introduced as alternatives to ozone-depleting substances to serve many industrial, commercial, and personal needs. HFCs are emitted as by-products of industrial processes and are also used in manufacturing. They do not significantly deplete the stratospheric ozone layer, but they are strong GHGs (IPCC 2001; USEPA 2023).

GHGs are dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Some GHGs have stronger greenhouse effects than others. These are referred to as high GWP gases. The GWP of GHG emissions are shown in Table 5.7-1, *GHG Emissions and Their Relative Global Warming Potential Compared to CO_2*. The GWP is used to convert GHGs to CO_2-equivalence (CO_2e) to show the relative potential that different GHGs have to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. For example, under IPCC's Fifth Assessment Report (AR5) GWP values for CH_4, a project that generates 10 MT of CH_4 would be equivalent to 280 MT of CO_2.[3]

Table 5.7-1 GHG Emissions and Their Relative Global Warming Potential Compared to CO_2

GHGs	Fifth Assessment Report Global Warming Potential Relative to CO_2[1]	Sixth Assessment Report Global Warming Potential Relative to CO_2[1]
Carbon Dioxide (CO_2)	1	1
Methane (CH_4)[2]	28	30
Nitrous Oxide (N_2O)	265	273

Source: IPCC 2013, 2021.
Notes: The IPCC published updated GWP values in its Sixth Assessment Report (AR6) that reflect latest information on atmospheric lifetimes of GHGs and an improved calculation of the radiative forcing of CO_2. However, GWP values identified in AR5 are used by the 2022 Scoping Plan for long-term emissions forecasting. Therefore, this analysis utilizes AR5 GWP values consistent with the current Scoping Plan.
1 Based on 100-year time horizon of the GWP of the air pollutant compared to CO_2.
2 The methane GWP includes direct effects and indirect effects due to the production of tropospheric ozone and stratospheric water vapor. The indirect effect due to the production of CO_2 is not included.

Human Influence on Climate Change

For approximately 1,000 years before the Industrial Revolution, the amount of GHGs in the atmosphere remained relatively constant. During the 20th century scientists observed a rapid change in the climate and the quantity of climate change pollutants in the Earth's atmosphere that is attributable to human activities. The amount of CO_2 in the atmosphere has increased by more than 35 percent since preindustrial times and has increased at an average rate of 1.4 parts per million per year since 1960, mainly due to the combustion of fossil fuels and deforestation (IPCC 2007). These recent changes in the quantity and concentration of climate change pollutants far exceed the extremes of the ice ages, and the global mean temperature is warming at a rate that cannot be explained by natural causes alone. Human activities are directly altering the chemical composition of the atmosphere through the buildup of climate change pollutants (CAT 2006). In the past, gradual changes in the earth's temperature changed the distribution of species, availability of water, etc. Human activities are

[3] The global warming potential of a GHG is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere.

accelerating this process so that environmental impacts associated with climate change no longer occur in a geologic time frame but within a human lifetime (IPCC 2007).

Like the variability in the projections of the expected increase in global surface temperatures, the environmental consequences of gradual changes in the Earth's temperature are hard to predict. Projections of climate change depend heavily upon future human activity. Therefore, climate models are based on different emission scenarios that account for historical trends in emissions and on observations of the climate record that assess the human influence of the trend and projections for extreme weather events. Climate-change scenarios are affected by varying degrees of uncertainty. For example, there are varying degrees of certainty on the magnitude of the trends for:

- Warmer and fewer cold days and nights over most land areas.
- Warmer and more frequent hot days and nights over most land areas.
- An increase in the frequency of warm spells and heat waves over most land areas.
- An increase in frequency of heavy precipitation events (or proportion of total rainfall from heavy falls) over most areas.
- Larger areas affected by drought.
- Intense tropical cyclone activity increases.
- Increased incidence of extreme high sea level (excluding tsunamis).

Potential Climate Change Impacts for California

Observed changes over the last several decades across the western United States reveal clear signs of climate change. Statewide, average temperatures increased by about 1.7°F from 1895 to 2011, and warming has been greatest in the Sierra Nevada (CCCC 2012). The years from 2014 through 2016 showed unprecedented temperatures, with 2014 being the warmest (OEHHA 2018). By 2050, California is projected to warm by approximately 2.7°F above 2000 averages, a threefold increase in the rate of warming over the last century. By 2100, average temperatures could increase by 5.6 to 8.8°F, depending on emissions levels (CNRA 2019).

In California and western North America, observations of the climate have shown: 1) a trend toward warmer winter and spring temperatures; 2) a smaller fraction of precipitation falling as snow; 3) a decrease in the amount of spring snow accumulation in the lower- and middle-elevation mountain zones; 4) advanced shift in the timing of snowmelt of 5 to 30 days earlier in the spring; and 5) a similar shift (5 to 30 days earlier) in the timing of spring flower blooms (CAT 2006). Statewide precipitation has become increasingly variable from year to year, with the driest consecutive three years from 2020 to 2022 (NOAA 2023). According to the California Climate Action Team—a committee of state agency secretaries and the heads of agencies, boards, and departments, led by the California Environmental Protection Agency—even if actions could be taken to immediately curtail climate change emissions, the potency of emissions that have already built up, their long atmospheric lifetimes (see Table 5.7-1), and the inertia of the Earth's climate system could produce as much as 0.6°C (1.1°F) of additional warming. Consequently, some impacts from climate change are now considered unavoidable. Global climate change risks to California are shown in Table 5.7-2, *Summary of GHG Emissions Risks to California*, and include impacts to public health, water resources, agriculture, coastal sea level, forest and biological resources, and energy.

Table 5.7-2 Summary of GHG Emissions Risks to California

Impact Category	Potential Risk
Public Health Impacts	Heat waves will be more frequent, hotter, and longer Fewer extremely cold nights Poor air quality made worse Higher temperatures increase ground-level ozone levels
Water Resources Impacts	Decreasing Sierra Nevada snowpack Challenges in securing adequate water supply Potential reduction in hydropower Loss of winter recreation
Agricultural Impacts	Increasing temperature Increasing threats from pests and pathogens Expanded ranges of agricultural weeds Declining productivity Irregular blooms and harvests
Coastal Sea Level Impacts	Accelerated sea level rise Increasing coastal floods Shrinking beaches Worsened impacts on infrastructure
Forest and Biological Resource Impacts	Increased risk and severity of wildfires Lengthening of the wildfire season Movement of forest areas Conversion of forest to grassland Declining forest productivity Increasing threats from pests and pathogens Shifting vegetation and species distribution Altered timing of migration and mating habits Loss of sensitive or slow-moving species
Energy Demand Impacts	Potential reduction in hydropower Increased energy demand

Sources: CEC 2006, 2009; CCCC 2012; CNRA 2014.

Specific climate change impacts that could affect the state of California include:

- **Water Resources Impacts**. By late this century, all projections show drying, and half of the projections suggest 30-year average precipitation will decline by more than 10 percent below the historical average. This drying trend is caused by an apparent decline in the frequency of rain and snowfall. Even in projections with relatively small or no declines in precipitation, central and southern parts of the state can be expected to be drier from the warming effects alone—the spring snowpack will melt sooner, and the moisture in soils will evaporate during long dry summer months (CCCC 2012).

- **Wildfire Risks**. Earlier snowmelt, higher temperatures, and longer dry periods over a longer fire season will directly increase wildfire risk. Indirectly, wildfire risk will also be influenced by potential climate-related changes in vegetation and ignition potential from lightning. Human activities will continue to be the biggest factor in ignition risk. The number of large fires statewide is estimated to increase from 58 percent to 128 percent above historical levels by 2085. Under the same emissions scenario, estimated burned area will increase by 57 percent to 169 percent, depending on location (CCCC 2012).

- **Health Impacts**. Many of the gravest threats to public health in California stem from the increase of extreme conditions—principally, more frequent, more intense, and longer heat waves. Particular concern centers on the increasing tendency for multiple hot days in succession and simultaneous heat waves in several regions throughout the state. Public health could also be affected by climate change impacts on air quality, food production, the amount and quality of water supplies, energy pricing and availability, and the spread of infectious diseases. Higher temperatures also increase ground-level ozone levels. Furthermore, wildfires can increase particulate air pollution in the major air basins of California (CCCC 2012).

- **Increase Energy Demand**. Increases in average temperature and higher frequency of extreme heat events combined with new residential development across the state will drive up the demand for cooling in the increasingly hot and longer summer season and decrease demand for heating in the cooler season. Warmer, drier summers also increase system losses at natural gas plants (reduced efficiency in the electricity generation process at higher temperatures) and hydropower plants (lower reservoir levels). Transmission of electricity will also be affected by climate change. Transmission lines lose 7 percent to 8 percent of transmitting capacity in high temperatures while needing to transport greater loads. This means that more electricity will need to be produced to make up for both the loss in capacity and the growing demand (CCCC 2012).

5.7.1.2 REGULATORY BACKGROUND

Federal, state, and local laws, regulations, plans, or guidelines related to greenhouse gas emissions that are applicable to the Proposed Project are summarized in this section.

Federal

United States Environmental Protection Agency

The US Environmental Protection Agency (EPA) announced on December 7, 2009, that GHG emissions threaten the public health and welfare of the American people and that GHG emissions from on-road vehicles contribute to that threat. The EPA's final findings respond to the 2007 U.S. Supreme Court decision that GHG emissions fit within the Clean Air Act definition of air pollutants. The findings do not impose any emission reduction requirements, but allow the EPA to finalize the GHG standards proposed in 2009 for new light-duty vehicles as part of the joint rulemaking with the Department of Transportation (USEPA 2009).

To regulate GHGs from passenger vehicles, EPA was required to issue an endangerment finding. The finding identified emissions of six key GHGs—CO_2, CH_4, N_2O, hydrofluorocarbons, perfluorocarbons, and SF_6—that have been the subject of scrutiny and intense analysis for decades by scientists in the United States and around the world. The first three are applicable to the proposed project's GHG emissions inventory because they constitute the majority of GHG emissions and are the GHG emissions that should be evaluated as part of a project's GHG emissions inventory.

US Mandatory Reporting Rule for GHGs (2009)

In response to the endangerment finding, the EPA issued the Mandatory Reporting of GHG Rule that requires substantial emitters of GHG emissions (large stationary sources, etc.) to report GHG emissions data. Facilities that emit 25,000 $MTCO_2e$ or more per year are required to submit an annual report.

Update to Corporate Average Fuel Economy Standards (2021 to 2026)

The federal government issued new Corporate Average Fuel Economy (CAFE) standards in 2012 for model years 2017 to 2025, which required a fleet average of 54.5 miles per gallon (mpg) in 2025. On March 30, 2020, the EPA finalized an updated CAFE and GHG emissions standards for passenger cars and light trucks and established new standards covering model years 2021 through 2026, known as the Safer Affordable Fuel Efficient (SAFE) Vehicles Final Rule for Model Years 2021 to 2026. Under SAFE, the fuel economy standards will increase 1.5 percent per year compared to the 5 percent per year under the CAFE standards established in 2012. Overall, SAFE requires a fleet average of 40.4 mpg for model year 2026 vehicles (85 Federal Register 24174 (April 30, 2020)).

On December 21, 2021, under direction of Executive Order (EO) 13990 issued by President Biden, the National Highway Traffic Safety Administration repealed Safer Affordable Fuel Efficient Vehicles Rule Part One, which had preempted state and local laws related to fuel economy standards. In addition, on March 31, 2022, the National Highway Traffic Safety Administration finalized new fuel standards in response to EO 13990. Fuel efficiency under the standards proposed will increase 8 percent annually for model years 2024 to 2025 and 10 percent annual for model year 2026. Overall, the new CAFE standards require a fleet average of 49 mpg for passenger vehicles and light trucks for model year 2026, which would be a 10 mpg increase relative to model year 2021 (NHTSA 2022).

State

Current State of California guidance and goals for reductions in GHG emissions are generally embodied in EO S-03-05, EO B-30-15, EO B-55-18, Assembly Bill 32 (AB 32), Senate Bill 32 (SB 32), and SB 375.

Executive Order S-03-05

EO S-03-05 was signed June 1, 2005, and set the following GHG reduction targets for the state:

- 2000 levels by 2010
- 1990 levels by 2020
- 80 percent below 1990 levels by 2050

Assembly Bill 32, the Global Warming Solutions Act (2006)

AB 32 was passed by the California state legislature on August 31, 2006, to place the state on a course toward reducing its contribution of GHG emissions. AB 32 follows the 2020 tier of emissions reduction targets established in EO S-03-05. The California Air Resources Board (CARB) prepared the 2008 Scoping Plan to outline a plan to achieve the GHG emissions reduction targets of AB 32.

Executive Order B-30-15

EO B-30-15, signed April 29, 2015, set a goal of reducing GHG emissions within the state to 40 percent of 1990 levels by year 2030. EO B-30-15 also directed CARB to update the Scoping Plan to quantify the 2030 GHG reduction goal for the state and requires state agencies to implement measures to meet the interim 2030 goal as well as the long-term goal for 2050 in EO S-03-05. It also requires the Natural Resources Agency to conduct triennial updates of the California adaption strategy, "Safeguarding California," to ensure climate change is accounted for in State planning and investment decisions.

Senate Bill 32 and Assembly Bill 197

In September 2016, Governor Brown signed SB 32 and AB 197 into law, making the EO B-30-15 goal for year 2030 into a statewide mandated legislative target. AB 197 established a joint legislative committee on climate change policies and requires CARB to prioritize direct emissions reductions rather than the market-based cap-and-trade program for large stationary, mobile, and other sources.

Executive Order B-55-18

Executive Order B-55-18, signed September 10, 2018, sets a goal "to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter." Executive Order B-55-18 directs CARB to work with relevant state agencies to ensure future Scoping Plans identify and recommend measures to achieve the carbon neutrality goal. The goal of carbon neutrality by 2045 is in addition to other statewide goals, meaning not only should emissions be reduced to 80 percent below 1990 levels by 2050, but that, by no later than 2045, the remaining emissions be offset by equivalent net removals of CO_2e from the atmosphere, including through sequestration in forests, soils, and other natural landscapes.

Assembly Bill 1279

AB 1279, signed by Governor Newsom in September 2022, codifies the carbon neutrality targets of EO B-55-18 for year 2045 and sets a new legislative target for year 2045 of 85 percent below 1990 levels for anthropogenic GHG emissions. CARB was required to update the Scoping Plan to identify and recommend measures to achieve the net-zero and GHG emissions-reduction goals.

2022 Climate Change Scoping Plan

CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality on December 15, 2022, which lays out a path to achieve carbon neutrality by 2045 or earlier and to reduce the state's anthropogenic GHG emissions (CARB 2022a). The 2022 Scoping Plan provides updates to the previously adopted 2017 Scoping Plan and addresses the carbon neutrality goals of EO B-55-18 (discussed above) and the ambitious GHG reduction target as directed by AB 1279. Previous Scoping Plans focused on specific GHG reduction targets for our industrial, energy, and transportation sectors—to meet 1990 levels by 2020 and then the more aggressive 40 percent below that for the 2030 target. The 2022 Scoping Plan updates the target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. Carbon neutrality takes it one step further by expanding actions to capture and store carbon, including through natural and working lands and mechanical technologies, while drastically reducing anthropogenic sources of carbon pollution.

The path forward was informed by the recent AR6 of the IPCC, and the measures would achieve 85 percent below 1990 levels by 2045 in accordance AB 1279. CARB's 2022 Scoping Plan identifies strategies as shown in Table 5.7-3, *Priority Strategies for Local Government Climate Action Plans*, that would be most impactful at the local level for ensuring substantial process towards the State's carbon neutrality goals.

Table 5.7-3 Priority Strategies for Local Government Climate Action Plans

Priority Area	Priority Strategies
Transportation Electrification	Convert local government fleets to zero-emission vehicles (ZEV) and provide EV charging at public sites.
	Create a jurisdiction-specific ZEV ecosystem to support deployment of ZEVs statewide (such as building standards that exceed state building codes, permit streamlining, infrastructure siting, consumer education, preferential parking policies, and ZEV readiness plans).
Vehicle Miles Traveled (VMT) Reduction	Reduce or eliminate minimum parking standards.
	Implement Complete Streets policies and investments, consistent with general plan circulation element requirements.
	Increase access to public transit by increasing density of development near transit, improving transit service by increasing service frequency, creating bus priority lanes, reducing or eliminating fares, microtransit, etc.
	Increase public access to clean mobility options by planning for and investing in electric shuttles, bike share, car share, and walking
	Implement parking pricing or transportation demand management pricing strategies.
	Amend zoning or development codes to enable mixed-use, walkable, transit-oriented, and compact infill development (such as increasing allowable density of the neighborhood).
	Preserve natural and working lands by implementing land use policies that guide development toward infill areas and do not convert "greenfield" land to urban uses (e.g., green belts, strategic conservation easements)
Building Decarbonization	Adopt all-electric new construction reach codes for residential and commercial uses.
	Adopt policies and incentive programs to implement energy efficiency retrofits for existing buildings, such as weatherization, lighting upgrades, and replacing energy-intensive appliances and equipment with more efficient systems (such as Energy Star-rated equipment and equipment controllers).
	Adopt policies and incentive programs to electrify all appliances and equipment in existing buildings such as appliance rebates, existing building reach codes, or time of sale electrification ordinances.
	Facilitate deployment of renewable energy production and distribution and energy storage on privately owned land uses (e.g., permit streamlining, information sharing).
	Deploy renewable energy production and energy storage directly in new public projects and on existing public facilities (e.g., solar photovoltaic systems on rooftops of municipal buildings and on canopies in public parking lots, battery storage systems in municipal buildings).

Source: CARB 2022a.

Based on Appendix D of the 2022 Scoping Plan, for residential and mixed-use development projects CARB recommends first demonstrating that these land use development projects are aligned with State climate goals based on the attributes of land use development that reduce operational GHG emissions while simultaneously advancing fair housing. Attributes that accommodate growth in a manner consistent with the GHG and equity goals of SB 32 have all the following attributes:

- Transportation Electrification
  - Provide EV charging infrastructure that, at a minimum, meets the most ambitious voluntary standards in the California Green Building Standards Code at the time of project approval.

- Vehicle Miles Traveled (VMT) Reduction
  - Is located on infill sites that are surrounded by existing urban uses and reuses or redevelops previously undeveloped or underutilized land that is presently served by existing utilities and essential public services (e.g., transit, streets, water, sewer).
  - Does not result in the loss or conversion of the State's natural and working lands.
  - Consists of transit-supportive densities (minimum of 20 residential dwelling units/acre), or is in proximity to existing transit stops (within a half mile), or satisfies more detailed and stringent criteria specified in the region's Sustainable Communities Strategy (SCS).
  - Reduces parking requirements by:
    - Eliminating parking requirements or including maximum allowable parking ratios (i.e., the ratio of parking spaces to residential units or square feet); or
    - Providing residential parking supply at a ratio of <1 parking space per dwelling unit; or
    - For multifamily residential development, requiring parking costs to be unbundled from costs to rent or own a residential unit.
  - At least 20 percent of the units are affordable to lower-income residents.
  - Result in no net loss of existing affordable units.
- Building Decarbonization
  - Use all electric appliances without any natural gas connections and does not use propane or other fossil fuels for space heating, water heating, or indoor cooking (CARB 2022a).

If the first approach to demonstrating consistency is not applicable (such as in the case of this school modernization project), the second approach to project-level alignment with state climate goals is to achieve net zero GHG emissions. The third approach to demonstrating project-level alignment with State climate goals is to align with GHG thresholds of significance, which many local air quality management and air pollution control districts have developed or adopted (CARB 2022a).

2017 Update to the SB 375 Targets

CARB is required to update the targets for the metropolitan planning organizations (MPO) every eight years. CARB adopted revised SB 375 targets for the MPOs in March 2018. The updated targets became effective in October 2018. All SCSs adopted after October 1, 2018, are subject to these new targets.

The targets consider the need to further reduce VMT, as identified in the 2017 Scoping Plan Update (for SB 32) while balancing the need for additional and more flexible revenue sources to incentivize positive planning and action toward sustainable communities. Like the 2010 targets, the updated SB 375 targets are in units of "percent per capita" reductions in GHG emissions from automobiles and light trucks relative to 2005. This excludes reductions anticipated from implementation of State technology and fuels strategies and any potential future state strategies, such as statewide road user pricing. The proposed targets call for greater per-capita GHG emission reductions from SB 375 than are currently in place, which for 2035 translate into proposed targets

that either match or exceed the emission reduction levels in the MPOs' currently adopted SCSs to achieve the SB 375 targets. CARB foresees that the additional GHG emissions reductions in 2035 may be achieved from land use changes, transportation investment, and technology strategies (CARB 2018).

Transportation Sector–Specific Regulations

Assembly Bill 1493

California vehicle GHG emission standards were enacted under AB 1493 (Pavley I). Pavley I is a clean-car standard that reduces GHG emissions from new passenger vehicles (light-duty auto to medium-duty vehicles) from 2009 through 2016 and was anticipated to reduce GHG emissions from new passenger vehicles by 30 percent in 2016. California implements the Pavley I standards through a waiver granted to California by the EPA. In 2012, the EPA issued a Final Rulemaking that sets even more stringent fuel economy and GHG emissions standards for model years 2017 through 2025 light-duty vehicles (see also the discussion on the update to the Corporate Average Fuel Economy standards in Section 5.7.1.2 under "Federal"). In January 2012, CARB approved the Advanced Clean Cars program (formerly known as Pavley II) for model years 2017 through 2025. The program combined the control of smog, soot, and GHGs with requirements for greater numbers of zero-emission (ZE) vehicles into a single package of standards. Under California's Advanced Clean Car program, by 2025, new automobiles will emit 34 percent less GHG emissions and 75 percent less smog-forming emissions.

Executive Order S-01-07

On January 18, 2007, the state set a new low-carbon fuel standard (LCFS) for transportation fuels sold in the state. EO S-01-07 set a declining standard for GHG emissions measured in grams of CO_2e per unit of fuel energy sold in California. The LCFS required a reduction of 2.5 percent in the carbon intensity of California's transportation fuels by 2015 and a reduction of at least 10 percent by 2020. The standard applied to refiners, blenders, producers, and importers of transportation fuels and used market-based mechanisms to allow these providers to choose the most economically feasible methods for reducing emissions during the "fuel cycle."

Executive Order B-16-2012

On March 23, 2012, the state identified that CARB, the California Energy Commission (CEC), the Public Utilities Commission, and other relevant agencies worked with the Plug-in Electric Vehicle Collaborative and the California Fuel Cell Partnership to establish benchmarks to accommodate ZE vehicles in major metropolitan areas, including infrastructure to support them (e.g., electric vehicle charging stations). EO B-16-2012 also directed the number of ZE vehicles in California's state vehicle fleet to increase through the normal course of fleet replacement, so that at least 10 percent of fleet purchases of light-duty vehicles are ZE by 2015 and at least 25 percent by 2020. The EO also established a target for the transportation sector of reducing GHG emissions to 80 percent below 1990 levels.

Executive Order N-79-20

On September 23, 2020, Governor Newsom signed Executive Order N-79-20, whose goal is that 100 percent of in-state sales of new passenger cars and trucks will be ZE by 2035. Additionally, the fleet goals for trucks are that 100 percent of drayage trucks are ZE by 2035, and 100 percent of medium- and heavy-duty vehicles

in the state are ZE by 2045, where feasible. The Executive Order's goal is for the State to transition to 100 percent ZE off-road vehicles and equipment by 2035, where feasible. On August 25, 2022, CARB adopted the Advanced Clean Cars II (ACC II) regulations that codifies the EO goal of 100 percent of in-state sales of new passenger vehicles and trucks be ZE by 2035. Starting in year 2026, ACC II requires that 35 percent of new vehicles sold be ZE or plug-in hybrids.

Renewables Portfolio: Carbon Neutrality Regulations

Senate Bills 1078, 107, and X1-2, and Executive Order S-14-08

A major component of California's Renewable Energy Program is the renewable portfolio standard (RPS) established under Senate Bills 1078 (Sher) and 107 (Simitian). Under the RPS, certain retail sellers of electricity were required to increase the amount of renewable energy each year by at least 1 percent in order to reach at least 20 percent by December 30, 2010. EO S-14-08 was signed in November 2008, which expanded the state's RPS to 33 percent renewable power by 2020. This standard was adopted by the legislature in 2011 (SB X1-2). Renewable sources of electricity include wind, small hydropower, solar, geothermal, biomass, and biogas. The increase in renewable sources for electricity production decreases indirect GHG emissions from development projects, because electricity production from renewable sources is generally considered carbon neutral.

Senate Bill 350

Senate Bill 350 (de Leon), was signed into law in September 2015 and establishes tiered increases to the RPS—40 percent by 2024, 45 percent by 2027, and 50 percent by 2030. SB 350 also set a new goal to double the energy efficiency savings in electricity and natural gas through energy efficiency and conservation measures.

Energy Efficiency Regulations

California Building Standards Code: Building Energy Efficiency Standards

Energy conservation standards for new residential and nonresidential buildings were adopted by the California Energy Resources Conservation and Development Commission (now the CEC) in June 1977 (Title 24, Part 6, of the California Code of Regulations [CCR]). Title 24 Part 6 requires the design of building shells and building components to conserve energy. The standards are updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods.

On August 11, 2021, the CEC adopted the 2022 Building Energy Efficiency Standards, which were subsequently approved by the California Building Standards Commission in December 2021. The 2022 standards went into effect on January 1, 2023, replacing the existing 2019 standards. In addition, the new standards also include prescriptive photovoltaic system and battery requirements for high-rise, multifamily buildings (i.e., more than three stories) and noncommercial buildings such as hotels, offices, medical offices, restaurants, retail stores, schools, warehouses, theaters, and convention centers (CEC 2021).

Senate Bill 100

On September 10, 2018, Governor Brown signed SB 100. Under SB 100, the RPS for public-owned facilities and retail sellers consists of 44 percent renewable energy by 2024, 52 percent by 2027, and 60 percent by 2030. SB 100 also established a new RPS requirement of 50 percent by 2026. Furthermore, the bill establishes an overall

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 the bill, the state cannot increase carbon emissions elsewhere in the western grid or allow resource shuffling to achieve the 100 percent carbon-free electricity target.

California Building Code: CALGreen

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (24 CCR, Part 11, known as "CALGreen") was adopted as part of the California Building Standards Code. CALGreen established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The mandatory provisions of CALGreen became effective January 1, 2011. In 2021, the CEC approved the 2022 CALGreen, which went into effect on January 1, 2023, replacing the 2019 standards.

2006 Appliance Efficiency Regulations

The 2006 Appliance Efficiency Regulations (20 CCR Sections 1601 to 1608) were adopted by the CEC on October 11, 2006, and approved by the California Office of Administrative Law on December 14, 2006. The regulations include standards for both federally regulated appliances and non–federally regulated appliances. Though these regulations are now often viewed as "business as usual," they exceed the standards imposed by all other states, and they reduce GHG emissions by reducing energy demand.

Solid Waste Diversion Regulations

AB 939: Integrated Waste Management Act of 1989

California's Integrated Waste Management Act of 1989 (Public Resources Code Sections 40050 et seq.) set a requirement for cities and counties throughout the state to divert 50 percent of all solid waste from landfills by January 1, 2000, through source reduction, recycling, and composting. In 2008, the requirements were modified to reflect a per capita requirement rather than tonnage. To help achieve this, the act required that each city and county prepare and submit a source reduction and recycling element. AB 939 also established the goal for all California counties to provide at least 15 years of ongoing landfill capacity.

AB 341

AB 341 (Chapter 476, Statutes of 2011) increased the statewide goal for waste diversion to 75 percent by 2020 and requires recycling of waste from commercial and multifamily residential land uses. Section 5.408 of CALGreen also requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse.

AB 1327

The California Solid Waste Reuse and Recycling Access Act (AB 1327, Public Resources Code secs. 42900 et seq.) required areas to be set aside for collecting and loading recyclable materials in development projects. The act required the California Integrated Waste Management Board to develop a model ordinance for adoption by

any local agency requiring adequate areas for collection and loading of recyclable materials as part of development projects. Local agencies are required to adopt the model or an ordinance of their own.

AB 1826

In October 2014 Governor Brown signed AB 1826 requiring businesses to recycle their organic waste on and after April 1, 2016, depending on the amount of waste they generate per week. This law also requires that on and after January 1, 2016, local jurisdictions across the state implement an organic waste recycling program to divert organic waste generated by businesses and multifamily residential dwellings with five or more units. Organic waste means food waste, green waste, landscape and pruning waste, nonhazardous wood waste, and food-soiled paper waste that is mixed with food waste.

Water Efficiency Regulations

SBX7-7

The 20x2020 Water Conservation Plan was issued by the Department of Water Resources (DWR) in 2010 pursuant to Senate Bill 7, which was adopted during the 7th Extraordinary Session of 2009–2010 and therefore dubbed "SBX7-7." SBX7-7 mandated urban water conservation and authorized the DWR to prepare a plan implementing urban water conservation requirements (20x2020 Water Conservation Plan). In addition, it required agricultural water providers to prepare agricultural water management plans, measure water deliveries to customers, and implement other efficiency measures. SBX7-7 required urban water providers to adopt a water conservation target of 20 percent reduction in urban per capita water use by 2020 compared to 2005 baseline use.

AB 1881: Water Conservation in Landscaping Act

The Water Conservation in Landscaping Act of 2006 (AB 1881) requires local agencies to adopt the updated DWR model ordinance or an equivalent. AB 1881 also required the CEC to consult with the DWR to adopt, by regulation, performance standards and labeling requirements for landscape irrigation equipment, including irrigation controllers, moisture sensors, emission devices, and valves to reduce the wasteful, uneconomic, inefficient, or unnecessary consumption of energy or water.

Short-Lived Climate Pollutant Reduction Strategy

On September 19, 2016, the Governor signed SB 1383 to supplement the GHG reduction strategies in the Scoping Plan to consider short-lived climate pollutants, including black carbon and CH_4. Black carbon is the light-absorbing component of fine particulate matter produced during the incomplete combustion of fuels. SB 1383 required the state board, no later than January 1, 2018, to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants—methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. The bill also established targets for reducing organic waste in landfills. On March 14, 2017, CARB adopted the Short-Lived Climate Pollutant Reduction Strategy, which identifies the state's approach to reducing anthropogenic and biogenic sources of short-lived climate pollutants. Anthropogenic sources of black carbon include on- and off-road transportation, residential wood burning, fuel combustion (charbroiling), and

industrial processes. According to CARB, ambient levels of black carbon in California are 90 percent lower than in the early 1960s, despite the tripling of diesel fuel use (CARB 2017a).

Local

Amador County General Plan

The Conservation Element establishes GHG-related policies designed to reduce GHG emissions and promote conservation efforts to reduce energy use, which effectively would reduce GHG emissions associated with electrical power generation (Amador County 2016). Conservation Element goals and policies regarding GHG emissions are:

- **Goal C-10:** Reduce GHG emissions associated with automobile travel, electrical power generation and energy use.
- **Policy C-10.1:** Evaluate the potential effects of climate change on the county's human and natural systems and prepare strategies that allow the County to appropriately respond and adapt.
- **Policy C-10.2:** Develop and adopt a comprehensive strategy to reduce GHGs within Amador County by at least 15 percent from current levels by 2020.
- **Policy C-10.3:** Guide new development to areas where pedestrian and bicycle access to existing activity centers is possible, in order to reduce the need for automobile travel and VMT.
- **Policy C-10.4:** Work with service providers to ensure that transit offerings in the county are stable or expanding, and that transit is tailored to meet residents' needs.
- **Policy C-10.5:** Require new development projects to incorporate building placement and design features to increase energy efficiency in new structures.
- **Policy C-10.6:** Support green building through incentives for Leadership in Energy and Environmental Design (LEED) certification of new commercial, industrial, public, and multi-family residential buildings. Promote incentives for compliance with this standard as a way to increase the energy efficiency of new structures. Promote increased energy efficiency and green building practices through the County's use of these practices.
- **Policy C-10.7:** Support parcel-scale energy generation, including addition of solar panels for residential structures and cogeneration for larger commercial or industrial uses.
- **Policy C-10.8:** Expand recycling and waste minimization efforts, including recycling of construction and demolition materials.

Amador County Transportation Commission

The Amador County Transportation Commission (ACTC) is the State-designated regional transportation planning agency and local transportation commission serving the Amador region (ACTC 2023). As the region's

local transportation commission, the ACTC oversees use of local transportation funds pursuant to the State's Transportation Development Act for funding public transit and other purposes.

Additionally, ACTC is responsible for adopting and maintaining the county's regional transportation plan (RTP). The latest, 2020 RTP Update reflects progress toward implementing the 2015 RTP and ensures compliance with the California Transportation Commission's 2017 Regional Transportation Guidelines (ACTC 2020). The RTP identifies the region's short-term and long-range transportation needs and establishes policies, programs, and projects designed to meet those needs for the next 20 years.

Amador County Energy Action Plan

On May 26, 2015, the County Board of Supervisors adopted an Energy Action Plan as the County's road map for expanding energy-efficiency and renewable-energy and for the associated cost-savings from these efforts (Amador County 2015). The document focuses on three energy use sectors in the community—residential, nonresidential, and municipal (subset of nonresidential).

City of Ione General Plan

The City of Ione General Plan sets goals, policies, and actions concerning the community and directs growth and development. Goals, policies, and actions related to GHG emissions are as follows (Ione 2009):

- **Policy CO-6.1:** Promote infill development as a means to limit vehicle trips and reduce the environmental impacts of new development and land use patterns.
- **Policy CO-6.5:** The City supports local, regional, and statewide efforts to reduce the emission of greenhouse gases linked to climate change.
- **Policy CO-6.6**: The City shall collaborate and consult with regional organizations and local jurisdictions within the City to reduce greenhouse gas emissions.

City of Ione Municipal Code

Ione Municipal Code includes various directives to minimize adverse impacts related to GHG emissions in Ione. It is organized by title, article, chapter, and section. Most provisions related to GHG impacts are in Title 15, Buildings and Construction, and Title 17, Zoning:

- **Chapter 15.04, California Building Code.** This chapter provides regulations for all new construction and any alterations, repairs, relocations, or reconstruction of any building. This chapter ensures that the minimum requirements and standards for building standards are met to protect the public safety and welfare of the city. Section 15.04.010, California Building Code–Adopted by reference, establishes that the City adopts the 2019 edition of the California Building Standards and Title 24 of the California Code of Regulations to ensure buildings are developed up to code. This also includes the California Energy Code and CALGreen.

- **Chapter 17.25, Public/Quasi Public Districts.** This chapter defines the applicable regulations regarding development and new land uses in the public/quasi public zoning districts established by Article II, Zoning Districts, Allowed Uses, and Development Standards.

City of Jackson General Plan

The City of Jackson General Plan is the primary planning document for the city. Circulation Element and Land Use Element goals, objectives, and policies related to GHG emissions are outlined here (Jackson 2008a, 2008b):

Circulation Element

- **Objective 2.A:** To minimize traffic and congestion in the City of Jackson.
- **Policy 2.A.2:** The City shall require that new development projects having the potential to create significant impacts to traffic be required to prepare a traffic impact study that conforms to Caltrans and ACTC guidelines as customized and adopted by the City of Jackson. "Significant traffic impacts" are to be determined by said guidelines.

  Traffic impact studies shall include recommended mitigation measures intended to help maintain the City's adopted LOS Policy 2.A.1 under cumulative 2025 conditions consistent with state laws concerning "nexus" and "rough proportionality." Such traffic impact studies shall also address the project's impacts and proposed mitigation measures as they directly relate to all other policies in the 2008 City of Jackson Circulation Element.
- **Policy 2.A.3**: The City shall require that new development's internal circulation plans include provisions for pedestrians, bicycles, automobiles, parking, and bus facilities as well as Neighborhood Electric Vehicles (NEVs) consistent with separately adopted alternative transportation plans and/or guidelines.
- **Goal 5:** Provide effective and efficient public transportation and reduce automobile dependency.
- **Policy 5.A.1:** The City shall encourage alternatives to single-occupant vehicle trips and make alternatives available to the extent deemed practical and economical.
- **Policy 5.A.2:** The City shall require new development to construct or contribute financially for transit facilities, as deemed necessary, for purposes of public convenience and fuel conservation, and to ensure transportation for the elderly and disabled.
- **Goal 6:** To provide a safe, comprehensive and integrated circulation system for non-motorized transportation.
- **Policy 6.A.2:** The City shall continue to require new development to construct sidewalks or meandering walkways along all street perimeters.
- **Policy 6.B.2:** Bicycle lanes shall be constructed along new or reconstructed arterial and collector routes in, or adjacent to, the City wherever possible.

- **Policy 6.B.4:** The City shall encourage existing businesses and employers to provide bicycle storage and lockers in order to promote bicycle commuter travel.

Land Use Element

- **Policy 1.8:** A balanced mix of housing, workplaces, shopping, recreational opportunities, and institutional uses, including mixed-use structures (combined residential and non-residential uses), that help to reduce vehicular trips shall be encouraged.

- **Policy 4.2:** To increase pedestrian access, development standards shall be created which require the installation of sidewalks for new development.

Currently, the City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals, objectives, policies, and actions related to GHG emissions are outlined here (Jackson 2023).

- **Policy LU 5-3:** Encourage projects that offer pedestrian scaled designs and walkability to reduce vehicle trips and parking demand within the downtown area.

- **Policy LU 7-2:** Consider environmental justice issues related to potential adverse health impacts associated with land use decisions, including methods to reduce exposure to hazardous materials, industrial activities, vehicle exhaust, other sources of pollution, and excessive noise on residents regardless of age, culture, gender, race, socioeconomic status, or geographic location.

- **Policy CIRC 2.3:** The City shall require that new development's internal circulation plans include provisions for pedestrians, bicycles, automobiles, parking, and bus facilities as well as Neighborhood Electric Vehicles (NEVs), if deemed feasible and beneficial, consistent with separately adopted alternative transportation plans and/or guidelines.

- **Policy CIRC 3.4:** The City shall minimize potential conflicts between trucks and pedestrian, bicycle, transit, and vehicle access and circulation on streets with truck travel.

- **Policy CIRC 5.1:** The City shall encourage alternatives to single-occupant vehicle trips and make alternatives available to the extent deemed practical and economical.

- **Goal CIRC-6:** To provide a safe, comprehensive and integrated circulation system for non-motorized transportation.

- **Objective 6.A:** Make bicycle and pedestrian travel an integral part of the City's circulation system.

- **Policy CIRC 6.1:** The City shall implement best practices to improve the pedestrian and bicycle environment.

- **Policy CIRC 6.9:** The City shall require new development to construct bicycle routes and/or provide secure facilities (i.e. bike racks), where feasible. To encourage biking and walking, provide amenities including pedestrian-scale lighting, bicycle parking, shade trees, and landscaping.

- **Policy CIRC 6.10:** The City shall encourage existing businesses and employers to provide bicycle storage and lockers in order to promote bicycle commuter travel.
- **Policy CIRC 8.1:** Support land use with increased densities and mixed uses, consistent with the Land Use Element, to reduce vehicle miles traveled (VMT) and promote the use of walking, biking, and transit.
- **Policy CIRC 8.2:** Encourage employers to provide programs for carpooling/transit/biking/walking subsidies, bicycle facilities, ridesharing, telecommuting, and working at/from home.
- **Policy CIRC 8.4:** Support the creation of electric vehicle charging stations at commercial, government, and other employment and community destinations.
- **Policy COS 5.2:** Support and encourage the implementation of innovative and green building best management practices (BMPs) including, but not limited to, sustainable site planning, solar opportunities, LEED certification, and exceeding the most current "green" development standards in the California Code of Regulations (CCR), Title 24, as feasible.
- **Policy COS 5.4:** As City fleet vehicles are replaced, procure alternative energy and fuel-efficient City vehicles and equipment that meet or surpass state emissions requirements, to the extent feasible.

City of Jackson Municipal Code

The Jackson Municipal Code includes various directives to minimize adverse impacts related to GHG emissions in Jackson. It is organized by title, article, chapter, and section. Most provisions related to GHG impacts are in Title 14, Buildings and Construction, and Title 17, Development Code:

- **Chapter 14.04, Uniform Codes.** This chapter provides regulations for all new construction and any alterations, repairs, relocations, or reconstruction of any building. This chapter ensures that the minimum requirements and standards for building standards are met to protect the public safety and welfare of the city. Section 14.04.010, Adoption of Codes and related appendices, establishes that the City adopts the 2022 edition of the California Building Standards and Title 24 of the California Code of Regulations to ensure buildings are developed up to code. This also includes the California Energy Code and CALGreen.
- **Chapter 17.16, Special Purpose Zoning Districts.** This chapter defines the applicable regulations regarding development and new land uses in the individual special purposing zoning districts, which contains public and institutional zoning district (P).

City of Jackson Energy Action Plan

The City of Jackson Energy Action Plan (EAP) is a road map for expanding energy-efficiency, water-efficiency and renewable-energy efforts already underway in the city (SBC 2015a). It builds upon efforts begun in 2010 and work conducted by Sierra Business Council in 2010 to 2012 and 2014. The EAP focuses on three energy use sectors within the community—residential, nonresidential, and municipal. The EAP specifies the actions

and strategies in the following five key areas to achieve reductions in energy consumption and increased energy savings for residents, businesses, and local government.

- Energy efficiency in existing structures
- Energy performance in new construction
- Expansion of renewable energy options
- Energy efficiency in municipal operations
- Reduction in water waste which reduces energy needed to transport and treat water

City of Sutter Creek General Plan

The City of Sutter Creek General Plan is the primary planning document for the city. Objectives, policies, and implementation measures related to GHG emissions are outlined here (Sutter Creek 2019).

- **Objective COS-1.11:** Reduce the emission of Greenhouse Gases from all activities within the City in compliance with State policies for Greenhouse Gas reduction and Climate Change.
  - **Implementation Measure COS-1.11.1.1:** The City shall focus on the following tasks to reduce emissions from the City's operations:
    - Reducing usage of city owned vehicles and replacing those that are not fuel efficient, and change procurement policy to specify high fuel efficiency for each vehicle class.
    - Comprehensive energy efficiency retrofit of existing municipal buildings and facilities.
    - Establish a purchasing policy requiring new electrical equipment to be Energy Star, or similarly, rated.
    - Evaluate the potential to utilize solar renewable-energy systems to operate municipal facilities.
    - Include energy-efficiency provisions in City-released RFPs related to wastewater infrastructure.
    - Switch existing traffic signals and street lights from incandescent bulbs to Light Emitting Diodes (LEDs).
    - Install water efficient landscaping in areas managed by the City and establish municipal water consumption reduction goals.
    - Increase office recycling, e.g. paper, cardboard, cans, toner cartridges.
    - Participate in PG&E's Phase II of Green Communities: Community-Wide Inventory.
    - Evaluate the potential to implement methane capture system to utilize digester gas for electricity and heating at the wastewater treatment plant, as well as solar energy systems.

City of Sutter Creek Municipal Code

Sutter Creek Municipal Code includes various directives to minimize adverse impacts related to GHG emissions in Sutter Creek. It is organized by title, chapter, article, division, and section. Most provisions related to GHG impacts are in Title 15, Buildings and Construction:

- **Chapter 15.04, Uniform Codes.** This chapter provides regulations for all new construction and any alterations, repairs, relocations, or reconstruction of any building. This chapter ensures that the minimum requirements and standards for building standards are met to protect the public safety and welfare of the city. Section 15.04.010, Adoption of Codes and related appendices, establishes that the City adopts the 2019 edition of the California Building Standards and Title 24 of the California Code of Regulations to ensure buildings are developed up to code. This also includes the California Energy Code and CALGreen.

City of Sutter Creek Energy Action Plan

The City of Sutter Creek EAP is a roadmap for expanding energy-efficiency, water-efficiency and renewable-energy efforts already underway in the city (SBC 2015b). It builds upon efforts begun in 1994 with the General Plan and work conducted by Sierra Business Council in 2010 and 2011. The EAP focuses on three energy use sectors within the community—residential, nonresidential, and municipal.

The goal of the plan is to reduce electricity use in 2020 by 19 percent (from the business-as-usual forecast) and natural gas use by 5 percent. This translates to annual savings in 2020 of 3.97 million kilowatt-hours of electricity and 37,000 therms of natural gas. The EAP specifies the actions and strategies in five key areas to achieve reductions in energy consumption and increased energy savings for residents, businesses, and local governments.

- Energy efficiency in existing structures
- Energy performance in new construction
- Expansion of renewable energy options
- Energy efficiency in municipal operations
- Reduction in water waste which reduces energy needed to transport and treat water

5.7.1.3 EXISTING CONDITIONS

California's GHG Sources and Relative Contribution

In 2022, the statewide GHG emissions inventory was updated for 2000 to 2020 emissions using the GWPs in IPCC's AR4, and the inventory reported that California produced 369.2 $MMTCO_2e$ GHG emissions in 2020 (CARB 2022b), which was 35.3 $MMTCO_2e$ lower than 2019 levels and 61.8 $MMTCO_2e$ below the 2020 GHG limit of 431 $MMTCO_2e$. The 2019 to 2020 decrease in emissions is likely due in large part to the impacts of the COVID-19 pandemic. However, since the peak level in 2004, California's GHG emissions have generally followed a decreasing trend. In 2014, statewide GHG emissions dropped below the 2020 GHG limit and have remained below the limit ever since. Per capita GHG emissions in California have dropped from a 2001 peak of 13.8 metric tons per person to 9.3 metric tons per person in 2020, a 33 percent decrease (CARB 2022a).

California's transportation sector remains the largest generator of GHG emissions, producing 37 percent of the state's total emissions in 2020. Industrial sector emissions made up 20 percent and electric power generation made up 16 percent of the 2020 inventory. Other major sectors of GHG emissions include commercial and residential (4 percent), agriculture and forestry (8.6 percent), high-GWP gases (5.8 percent), and recycling and waste (2 percent) (CARB 2022b).

Transportation emissions continued to decline for the past three consecutive years with the rise of fuel efficiency for the passenger vehicle fleet and an increase in battery electric vehicles. The deployment of renewable and less carbon-intensive resources and higher energy efficiency standards have facilitated the continuing decline in fossil fuel electricity generation. The industrial sector trend has been relatively flat in recent years but saw a decrease of 7.1 $MMTCO_2e$ in 2020. Commercial and residential emissions saw a decrease of 1.7 $MMTCO_2e$. Emissions from high-GWP gases have continued to increase as they replace ozone-depleting substances that are being phased out under the 1987 Montreal Protocol. Emissions from other sectors have remained relatively constant in recent years. Overall trends in the inventory also continue to demonstrate that the carbon intensity of California's economy (i.e., the amount of carbon pollution per million dollars of gross domestic product) is declining. From 2000 to 2020, the carbon intensity of California's economy decreased by 49 percent while the gross domestic product increased by 56 percent (CARB 2022b).

Project Site GHG Emissions

The ACUSD campuses that are part of the proposed project contain operating school campuses, which currently generate GHG emissions from transportation (i.e., student, staff, and vendor vehicle trips), area sources (e.g., consumer products, cleaning supplies), energy use, water use and wastewater generation, and solid waste disposal.

5.7.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

GHG-1 Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

GHG-2 Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

5.7.2.1 SMAQMD'S THRESHOLD OF SIGNIFICANCE

SMAQMD has created a tiered approach in evaluating operation-related GHG emissions impacts (SMAQMD 2021). Per SMAQMD's guide to Air Quality Assessment in Sacramento County (AQ Guidelines), a project may be evaluated for consistency with a qualified GHG Reduction Strategy. If a project is determined to be consistent with the qualified GHG Reduction Strategy, it is considered to result in a less than significant GHG emissions impact. However, if a project is not consistent with an applicable qualified GHG Reduction Strategy,

or there is no applicable qualified GHG Reduction Strategy, a project may be evaluated against the GHG operational screening levels.

The screening levels represent the size of development that would not generate operational emissions exceeding 1,100 $MTCO_2e/yr$. If a project does not exceed the screening levels or generates emissions less than or equal to 1,100 $MTCO_2e/yr$ and implements the Tier 1 GHG Best Management Practices (BMP), it is determined to result in a less than significant GHG emissions impact. The Tier 1 BMPs prohibit use of natural gas and require a project to be designed and constructed without natural gas infrastructure (BMP 1) and require a project to meet the current CALGreen Tier 2 EV ready standards (BMP 2). If a project exceeds 1,100 $MTCO_2e/yr$ with the Tier 1 BMPs, it would be required to incorporate the Tier 2 BMPs, which consists of BMP 3. A project would meet BMP 3 requirements if it were to reduce its VMT by 15 percent for residential and/or worker compared to the existing average VMT per capita in the county. Additionally, if applicable, the retail component of a project must achieve a no net increase in GHG production.

5.7.3 Environmental Impacts

5.7.3.1 METHODOLOGY

This GHG emissions evaluation was prepared in accordance with the requirements of CEQA to determine if significant greenhouse gas impacts are likely to occur as a result of the proposed project. SMAQMD's AQ Guidelines provide local governments with guidance for analyzing and mitigating GHG emissions impacts.

The project GHG emissions forecast includes the following sectors:

- **On-Road Transportation.** Transportation emissions are based on the trip generation associated with the net increase in student population at Argonaut HS, Ione Junior HS, and Sutter Creek ES as provided by Kittelson & Associates (see Appendix C of this Draft EIR). The fleet mix in CalEEMod was adjusted to reflect a higher proportion of passenger vehicles.
- **Area Sources.** Area sources generated from use of consumer products and cleaning supplies are based on CalEEMod default emission rates and on the assumed building square footage.
- **Energy.** The CalEEMod default energy rates and default carbon intensity factors for PG&E were utilized for the proposed project. School buildings would be designed to be all-electric.
- **Solid Waste Disposal.** Indirect emissions from waste generation are based on the default CalEEMod solid waste generation rate for high school land use.
- **Water/Wastewater.** GHG emissions from this sector are associated with the embodied energy used to supply water, treat water, distribute water, and then treat wastewater and fugitive GHG emissions from wastewater treatment. Indoor water use and wastewater demand are based on the default CalEEMod water generation rate for high school land use.

- **Construction.** The project-related construction emissions are based on information provided by the District for the maximum development scenario (Argonaut HS site improvements). Construction is anticipated to occur between Spring 2024 to Spring 2025 for an approximately 12-month duration based on information provided by the District. The construction equipment mix is generally based on CalEEMod defaults.

Life-cycle emissions are not included in this analysis because not enough information is available for the proposed project. Therefore, lifecycle GHG emissions would be speculative (OPR 2008).[4] Additionally, black carbon emissions are not included in the GHG analysis because CARB does not include this short-lived climate pollutant in the State's AB 32/SB 32 inventory but treats it separately (CARB 2017b).

5.7.3.2 IMPACT ANALYSIS

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.7-1: The proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment. [Threshold GHG-1]

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. Therefore, the impact discussion below does not contain a separate standard of significance regarding cumulative impacts.

School Closure/Consolidation Program Project

The proposed project would include physical site improvements at three ACUSD campuses to accommodate the consolidation of eight campuses onto six current ACUSD campuses. The closure of two ACUSD campuses would result in a net decrease in total building square footage and the conversion of Jackson Junior HS into the County Preschool Center would decrease student enrollment by 151 students. Thus, the proposed project would result in an overall decrease in operational GHG emissions from area sources (e.g., consumer cleaning products), energy usage (i.e., natural gas and electricity), solid waste generation, and wastewater generation. Only mobile emissions would increase because VMT per student would increase by 5.2 percent due to the relocation and consolidation of students from eight to six ACUSD campuses (see Section 5.15, *Transportation*). Therefore, evaluation of operational GHG emissions associated with area sources, energy usage, solid waste

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

generation, and wastewater generation from the site improvements at the three ACUSD campuses was not warranted.

Table 5.7-4, *Cumulative Project-Related GHG Emissions,* shows that development and construction of the proposed project would generate a net increase in annual emissions that would not exceed the SMAQMD threshold of 1,100 $MTCO_2e$ per year. Annual average construction emissions were amortized over 30 years.

Table 5.7-4 Cumulative Project-Related GHG Emissions

Source	GHG Emissions $MTCO_2e$ per Year
Mobile[1]	408
Amortized Construction Emissions[2]	26
Total Net Emissions	434
SMAQMD GHG Threshold	1,100 $MTCO_2e$/Yr
Exceeds Threshold?	**No**

Source: CalEEMod, version 2022.1.
Notes: $MTCO_2e$ = metric ton of carbon dioxide equivalent
[1] Vehicle emissions based on net increase in VMT and total projected daily trip generated from all school campuses. Musunuru 2023.
[2] Total construction emissions are amortized over 30 years per SMAQMD methodology.

GHG emissions from the new building energy use would be minimized because the proposed school buildings at the three ACUSD campuses would be designed to meet the current California Building and Energy Efficiency Standards, as well as be all-electric buildings. Therefore, the proposed project would satisfy SMAQMD's applicable Tier 1 BMP all-electric energy systems. Since the proposed project would not be adding parking spaces, it would not need to comply with Tier 1 BMP electric-vehicle parking stalls requirement (refer to Chapter 3, *Project Description*).

The proposed project would not increase student enrollment and would provide for a more efficient use of resources. Overall, the proposed project would not generate a net increase in annual GHG emissions that would exceed the SMAQMD GHG threshold and would meet SMAQMD'S Tier 1 BMP requirements. GHG emissions associated with the proposed project would not result in cumulative contribution to GHG emissions and impacts would be **less than significant**.

Argonaut High School Site Improvements

The site improvements at Argonaut HS would produce project-related GHG emissions. However, only mobile emissions would increase due to the increase in VMT per student to relocate to Argonaut HS (Amador HS located 4.6 miles away) and the net decrease in building square footage associated with the closure of the two ACUSD campuses. Based on the transportation daily vehicle trip data (included in Appendix C), 45 percent of the total mobile GHG emissions shown in Table 5.7-4 would be associated with Argonaut HS campus, which is equivalent to 184 $MTCO_2e$ per year. The site improvements at Argonaut HS would also result in an improvement to the access and circulation system near the Argonaut HS campus. A new parent drop-off/pick-up area, new access driveway connecting to Stony Creek Road, and accessibility compliance improvements

would be built throughout the campus, which would make vehicle flow more efficiently and decrease transportation GHG emissions.

The proposed school building at Argonaut HS would be compliant with SMAQMD's applicable Tier 1 BMP all-electric energy systems. Since the site improvements at Argonaut HS would be consistent with the Climate Change Scoping Plan by implementing SMAQMD's Tier 1 BMP and not exceed SMAQMD's GHG threshold, the site improvements at Argonaut HS would not generate a net increase in annual GHG emissions that would exceed the SMAQMD's GHG screening threshold. Operational GHG emissions associated with the site improvements at Argonaut HS would not result in cumulative contribution to GHG emissions and impacts would be **less than significant**.

Ione Junior High School Site Improvements

The site improvements at Ione Junior HS would produce project-related GHG emissions. However, only mobile emissions would increase due to the increase in VMT per student to relocate to Ione Junior HS (Ione ES located 0.5 miles away) and the net decrease in building square footage associated with the closure of the two ACUSD campuses. Based on the transportation daily vehicle trip data (included in Appendix C), 27 percent of the mobile GHG emissions shown in Table 5.7-4 would be associated with Ione Junior HS, which is equivalent to 110 $MTCO_2e$ per year. The site improvements at Ione Junior HS would also result in an improvement to access at campus by expanding the parent drop-off/pick-up areas and expanding the kindergarten drop-off area, which would make vehicle flow more efficiently and decrease transportation GHG emissions.

The proposed school building at Ione Junior HS would be compliant with SMAQMD's applicable Tier 1 BMP all-electric energy systems. Since the site improvements at Ione Junior HS would be consistent with the Climate Change Scoping Plan by implementing SMAQMD's Tier 1 BMP and not exceed SMAQMD's GHG threshold, the site improvements at Ione Junior HS would not generate a net increase in annual GHG emissions that would exceed the SMAQMD's GHG screening threshold. Operational GHG emissions associated with the site improvements at Ione Junior HS would not result in cumulative contribution to GHG emissions and impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

The site improvements at Sutter Creek ES would produce project-related GHG emissions. However, only mobile emissions would increase due to the increase in VMT per student to accommodate additional grades at Sutter Creek ES campus and the net decrease in building square footage associated with the closure of the two ACUSD campuses. Based on the transportation daily vehicle trip data (included in Appendix C), 28 percent of the mobile GHG emissions in Table 5.7-4 would be associated with Sutter Creek ES campus, which is equivalent to 114 $MTCO_2e$ per year.

The proposed school building at Sutter Creek ES would be compliant with SMAQMD's applicable Tier 1 BMP all-electric energy systems. Since the site improvements at Sutter Creek ES would be consistent with the Climate Change Scoping Plan by implementing SMAQMD's Tier 1 BMP and not exceed SMAQMD's GHG threshold, the site improvements at Sutter Creek ES would not generate a net increase in annual GHG emissions that

would exceed the SMAQMD's GHG screening threshold. Operational GHG emissions associated with the site improvements at Sutter Creek ES would not result in cumulative contribution to GHG emissions and impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.7-2: The proposed project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases. [Threshold GHG-2]

School Closure/Consolidation Program Project

CARB's Scoping Plan

CARB's Climate Change Scoping Plan outlines the State's strategies to reduce GHG emissions in accordance with the targets established under AB 32 and SB 32. The Scoping Plan is applicable to State agencies and is not directly applicable to school districts, cities/counties, and individual projects. 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).

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 and SB 32. For example, the site improvements at the three ACUSD campuses as part of the school closure/consolidation program would meet the applicable CALGreen and Building Energy Efficiency standards. As shown in Table 5.7-4, the proposed project would not exceed SMAQMD's GHG threshold, which was developed to demonstrate consistency with SB 32 and statewide carbon neutrality by 2045. Therefore, the proposed project would generate GHG emissions consistent with the reduction goals of AB 32 and SB 32, and impacts are considered **less than significant**.

County and City EAPs

This impact discussion evaluates the proposed project's consistency with applicable plans adopted for the purpose of reducing GHG emissions, which include CARB's Scoping Plan. While the District is not subject to the cities' EAPs, as discussed under Energy Impact 5.5-2, the proposed project would be consistent with the County and Cities EAPs' goals to reduce energy consumption and GHG emissions. Thus, the proposed project would not interfere with implementation of the EAPs and impacts would be **less than significant**.

Argonaut High School Site Improvements

The site improvements at Argonaut HS 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 and SB 32. As shown in Table 5.7-4, the proposed project would not exceed SMAQMD's GHG threshold, which was developed to demonstrate consistency with SB 32 and statewide carbon neutrality by 2045. Therefore, the site improvements at Argonaut HS would generate even smaller GHG emissions, and impacts would be considered **less than significant**.

Ione Junior High School Site Improvements

The site improvements at Ione Junior HS 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 and SB 32. As shown in Table 5.7-4, the proposed project would not exceed SMAQMD's GHG threshold, which was developed to demonstrate consistency with SB 32 and statewide carbon neutrality by 2045. Therefore, the site improvements at Ione Junior HS would generate even smaller GHG emissions, and impacts would be considered **less than significant**.

Sutter Creek Elementary School Site Improvements

The site improvements at Sutter Creek ES 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 and SB 32. As shown in Table 5.7-4, the proposed project would not exceed SMAQMD's GHG threshold, which was developed to demonstrate consistency with SB 32 and statewide carbon neutrality by 2045. Therefore, the site improvements at Sutter Creek ES would generate even smaller GHG emissions, and impacts would be considered **less than significant**.

Level of Significance Before Mitigation: Less than significant impact.

5.7.4 Mitigation Measures

No mitigation measures are required.

5.7.5 Level of Significance After Mitigation

No mitigation measures are required, and the impacts remain less than significant.

5.7.6 Cumulative Impacts

Project-related GHG emissions are not confined to a particular air basin but are dispersed worldwide. Therefore, Impact 5.7-1 is not a project-specific impact, but the proposed project's contribution to a cumulative impact. As shown in Table 5.7-4, implementation of the proposed project would implement SMAQMD's Tier 1 BMP and would not result in annual emissions that would exceed SMAQMD's GHG threshold, which was developed to demonstrate consistency with SB 32 and statewide carbon neutrality by 2045. Therefore, project-related GHG emissions and their contribution to global climate change would not be cumulatively considerable, and GHG emissions impacts would be **less than significant**.

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5. Environmental Analysis
GREENHOUSE GAS EMISSIONS

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5.8 HAZARDS AND HAZARDOUS MATERIALS

This section evaluates the potential impacts of the proposed project on human health and the environment due to exposure to hazardous materials or conditions associated with the project site, project construction, and project operations. Potential project impacts and appropriate mitigation measures or standard conditions are included as necessary.

5.8.1 Environmental Setting

5.8.1.1 REGULATORY BACKGROUND

Federal

Emergency Planning and Community Right-to-Know Act

In 1986, Congress passed the Superfund Amendments and Reauthorization Act. Title III of this regulation is called the "Emergency Planning and Community Right-to-Know Act of 1986" (EPCRA). The act required the establishment of state commissions, planning districts, and local committees to facilitate the preparation and implementation of emergency plan. Under its requirements, local emergency planning committees (LEPC) are responsible for developing a plan for preparing for and responding to a chemical emergency, including:

- An identification of local facilities and transportation routes where hazardous materials are present.
- The procedures for immediate response in case of an accident (this must include a community-wide evacuation plan).
- A plan for notifying the community that an incident has occurred.
- The names of response coordinators at local facilities.
- A plan for conducting drills to test the plan.

The emergency plan is reviewed by the State Emergency Response Commission and publicized throughout the community. The LEPC is required to review, test, and update the plan each year. The Amador County Environmental Health Department (ACEHD) is responsible for coordinating hazardous material and disaster preparedness planning and appropriate response efforts with city departments and local and state agencies. The goal is to improve public and private sector readiness and to mitigate local impacts resulting from natural or manmade emergencies.

Another purpose of the EPCRA is to inform communities and citizens of chemical hazards in their areas. Sections 311 and 312 of EPCRA require businesses to report to state and local agencies the location and quantities of chemicals stored onsite. Under Section 313 of EPCRA, manufacturers are required to report chemical releases for more than 600 designated chemicals. In addition to chemical releases, regulated facilities are also required to report off-site transfers of waste for treatment or disposal at separate facilities, pollution prevention measures, and chemical recycling activities. The US Environmental Protection Agency (EPA)

maintains the Toxic Release Inventory database, which documents the information that regulated facilities are required to report annually.

Resource Conservation and Recovery Act

The Resource Conservation and Recovery Act (RCRA) of 1976 (42 US Code Section 6901 et seq.) is the principal federal law that regulates the generation, management, and transportation of waste. Hazardous waste management includes the treatment, storage, or disposal of hazardous waste. The RCRA gave the EPA the authority to control hazardous waste from "cradle to grave," that is, from generation to transportation, treatment, storage, and disposal, at active and future facilities. It does not address abandoned or historical sites. The RCRA also set up a framework for managing nonhazardous wastes. Later amendments required phasing out land disposal of hazardous waste and added underground tanks storing petroleum and other hazardous substances.

Toxic Substances Control Act

The Toxic Substances Control Act of 1976 provides the EPA with authority to require reporting, record-keeping and testing requirements, and restrictions relating to chemical substances and/or mixtures. The act addresses the production, importation, use, and disposal of specific chemicals, including polychlorinated biphenyls, asbestos, radon, and lead-based paint.

Comprehensive Environmental Response, Compensation, and Liability Act

The Comprehensive Environmental Response, Compensation and Liability Act of 1980 (42 US Code Chapter 103) protects the water, air, and soil resources from the risks created by past chemical disposal practices. It is also referred to as the Superfund Act and regulates sites on the National Priority List, which are called Superfund sites. This law provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. It establishes requirements concerning closed and abandoned hazardous waste sites; provides for liability of persons responsible for releases of hazardous waste at these sites; and establishes a trust fund to provide for cleanup when no responsible party can be identified.

Clean Water Act

The Clean Water Act (CWA) is a 1977 amendment to the Federal Water Pollution Control Act of 1972. The CWA is the principal statute governing water quality. It establishes the basic structure for regulating discharges of pollutants into the waters of the United States[1] and gives the EPA the authority to implement pollution-control programs, such as setting wastewater standards for industry. The statute's goal is to end all discharges entirely and to restore, maintain, and preserve the integrity of the nation's waters. The CWA regulates both the direct and indirect discharge of pollutants into the nation's waters. The CWA sets water quality standards for all contaminants in surface waters and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a permit is obtained under its provisions. The CWA mandates permits for

[1] Waters of the United States generally include surface waters—lakes, rivers streams, bays, the ocean, dry streambeds, wetlands, and storm sewers that are tributary to any surface water body.

wastewater and stormwater discharges, requires states to establish site-specific water quality standards for navigable bodies of water, and regulates other activities that affect water quality, such as dredging and the filling of wetlands. The CWA also funded the construction of sewage treatment plants and recognized the need for planning to address nonpoint sources of pollution.

Several sections of the CWA are discussed in Section 5.9, *Hydrology and Water Quality*, of this DEIR.

Hazardous Waste Operations and Emergency Response Standards

The Occupational Safety and Health Administration issued the Hazardous Waste Operations and Emergency Response (HAZWOPER) standards, Code of Federal Regulations (CFR) Title 29, Sections 1910.120 and 1926.65, to protect workers and enable them to handle hazardous substances safely and effectively. Section 1926.65 is for the construction industry and is identical to Section 1910.120.

The HAZWOPER standard applies to employers who perform:

- Hazardous-waste site-cleanup operations.
- Operations involving hazardous waste that are conducted at treatment, storage, and disposal facilities.
- Emergency response operations involving hazardous substance releases.

The HAZWOPER standards provide information and training criteria to employers, emergency response workers, and other workers potentially exposed to hazardous substances to improve workplace safety and health and reduce workplace injuries and illnesses from exposures to hazardous substances. It is critical for employers and their workers to understand the scope and application of HAZWOPER so they can determine which sections apply to their specific work operations.

Hazardous Materials Transportation

Section 31303 of the California Vehicle Code and the US Department of Transportation (USDOT) regulate hazardous materials transport. The California Highway Patrol and California Department of Transportation are the enforcement agencies. The California Office of Emergency Services provides emergency response services involving hazardous materials incidents.

Hazardous Materials Incident Response

Under Title III of the Superfund Amendments and Reauthorization Act, the LEPC is responsible for developing an emergency plan to prepare for and respond to chemical emergencies. This emergency plan must include:

- An identification of local facilities and transportation routes where hazardous materials are present.
- The procedures for immediate response in case of an accident (this must include a community-wide evacuation plan).
- A plan for notifying the community that an incident has occurred.

- The names of response coordinators at local facilities.
- A plan for conducting exercises to test the plan.

The plan is reviewed by the State Emergency Response Commission and publicized throughout the community. The LEPC is required to review, test, and update the plan each year. The ACEHD is responsible for coordinating hazardous material coordination and inspection in the county.

Title 40 CFR Section 61 Subpart M

National Emissions Standards for Asbestos (40 CFR Section 61, Subpart M) sets emissions standards for asbestos from demolition and renovation activities, and for waste disposal from such activities.

State

Hazardous Materials Release Notification

Many State statutes require emergency notification of a hazardous chemical release:

- Health and Safety Code, Sections 25270.8 and 25507
- Vehicle Code, Section 23112.5
- Public Utilities Code, Section 7673 (PUC General Orders #22-B, 161)
- Government Code, Sections 51018, 8670.25.5(a)
- Water Code, Sections 13271, 13272
- Labor Code, Section 6409.1 (b)10

Requirements for immediate notification of all significant spills or threatened releases cover owners, operators, persons in charge, and employers. Notification is required regarding significant releases from facilities, vehicles, vessels, pipelines, and railroads. In addition, all releases that result in injuries or harmful exposure to workers must be immediately reported to the California Occupational Safety and Health Administration (Cal/OSHA) pursuant to the California Labor Code Section 6409.1(b).

Uniform Hazardous Waste and Hazardous Materials Management Regulatory Program

The Unified Program administered by the State of California consolidates, coordinates, and makes consistent the administrative requirements, permits, inspections, and enforcement activities for environmental and emergency management programs, which include: Hazardous Materials Release Response Plans and Inventories (business plans), the California Accidental Release Prevention (CalARP) Program, and the Underground Storage Tank (UST) Program. The Unified Program is implemented at the local government level by Certified Unified Program Agencies (CUPA).

The CUPA for Amador County is the ACEHD; it is responsible for regulating hazardous materials business plans and chemical inventory, hazardous waste and tiered permitting, USTs, aboveground storage tanks, and risk management plans.

California Accidental Release Prevention Program

CalARP became effective on January 1, 1997, in response to Senate Bill 1889 (Chapter 715, Statutes of 1996). CalARP aims to be proactive and therefore requires businesses to prepare risk management plans, that is, detailed engineering analyses of the potential accident factors at a business and mitigation measures to reduce this accident potential. Th requirement for a risk management plan is coupled with the requirement for a hazardous materials business plan under the Unified Program, implemented by the CUPA.

Leaking Underground Storage Tanks

Leaking USTs (LUST) have been recognized since the early 1980s as the primary cause of groundwater contamination from gasoline compounds and solvents. In California, regulations aimed at protecting against UST leaks have been in place since 1983 (Health and Safety Code). This was a year before RCRA was amended to add Subtitle I, which required UST systems to be installed in accordance with standards that address the prevention of future leaks. The State Water Resources Control Board has been designated the lead California regulatory agency in the development of UST regulations and policy.

Older tanks are typically single-walled steel tanks. Many of these have leaked as a result of corrosion, punctures, and detached fittings. As a result, the State of California required the replacement of older tanks with new double-walled fiberglass tanks with flexible connections and monitoring systems. UST owners were given 10 years to comply with the new requirements—until December 22, 1998. However, many UST owners did not act by the deadline, so the State granted an extension ending January 1, 2002. The California Regional Water Quality Control Boards, in cooperation with the Office of Emergency Services, maintain an inventory of leaking USTs in a statewide database.

California Code of Regulations, Title 22, Division 4.5

Title 22, Division 4.5, of the California Code of Regulations (CCR) sets the requirements for hazardous-waste generators; transporters; and owners or operators of treatment, storage, or disposal facilities. These include the requirements for packaging, storage, labeling, reporting, and general management of hazardous waste prior to shipment. In addition, the regulations identify standards applicable to transporters of hazardous waste. These regulations specify the requirements for transporting shipments of hazardous waste, including manifesting, vehicle registration, and emergency accidental discharges during transportation.

California Fire Code

The 2022 California Fire Code (24 CCR Part 9) sets requirements pertaining to fire safety and life safety, including for building materials and methods, fire protection systems in buildings, emergency access to buildings, and handling and storage of hazardous materials.

Worker Safety Standards: Asbestos

Worker safety standards for asbestos exposure are in 8 CCR Section 1532.1 and apply to employees conducting demolition, construction, and renovation work, including painting and decorating.

Regional

Amador County General Plan

The Safety Element incorporates by reference the Multi-Hazard Mitigation Plan, which describes the County's actions to reduce or eliminate long-term risk to human life and property from hazards. Hazard mitigation planning identifies natural hazards, determines their likely impacts, sets mitigation goals, and implements appropriate strategies. Safety Element goals and policies regarding hazardous materials are:

- **Goal S-6:** Protect people and resources from hazards posed by mining facilities and hazardous materials sites.
- **Policy S-6.1:** Coordinate with State and federal agencies to limit hazardous materials risks through the land use planning process. Utilize existing County hazardous materials facility information to identify areas of hazardous materials use, and restrict the use of hazardous materials to nonresidential and non-sensitive areas.
- **Policy S-6.2:** Locate hazardous materials facilities so as to limit potential hazards related to the proximity of sensitive populations and the distance and routes traveled for local deliveries.
- **Policy S-6.3:** Encourage the use of programs and products to reduce and replace the use of hazardous materials where feasible.

Amador County Municipal Code

Chapter 7.25, Hazardous Materials, incorporates and implements hazardous waste laws and policies—Hazardous Waste Control Law, the Above Ground Petroleum Storage Act, the Underground Storage of Hazardous Substances Law, the Petroleum Underground Storage Tank Cleanup Law, the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program, and Articles 1 and 2 of the Hazardous Materials Release Response Plans and Inventory Law—and establishes standards and procedures for the regulation and permitting of facilities that generate, store, or treat hazardous wastes.

Local

Sutter Creek General Plan

- **Policy S-1.4.8:** Buildings in urban-wildland interface areas shall comply with California Department of Forestry and Fire Protection recommendations on defensible space.
- **Policy S-1.4.1:** The Sutter Creek Fire District shall be asked by the City to review development plans, land division projects, and planned developments to ensure compliance with fire suppression and prevention requirements.
- **Policy S-1.6.1:** The City of Sutter Creek adopts and incorporates by reference the Household Hazardous Waste Element prepared by the Countywide AB 939 Committee.

- **Policy S-1.6.3:** The City Building Inspector will screen non-residential building permits to determine the proposed use of hazardous materials and refer such proposed uses to appropriate State and local agencies as necessary.

Sutter Creek Municipal Code

Chapter 17.10.120, Soils and/or hazardous materials report. A preliminary soils report and/or a hazardous materials report prepared by a civil engineer or engineering geologist registered in California, and based upon adequate test borings and/or other testing or analysis, may be required by the city engineer for any subdivision for which a final map is required by this title.

Jackson General Plan

As stated in the Safety Element of the Jackson General Plan, "[i]t is the policy of the City of Jackson to rely on State and County regulations regarding the handling, storage, transportation, use, and disposal of toxic and hazardous materials to ensure a problem does not develop. City inspectors and officials shall report suspected cases of violation of the regulations controlling hazardous materials to the County Health Department" (Jackson 1981).

The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals, policies, and actions related to hazardous materials are outlined here (Jackson 2023).

- **Goal SA-5:** Protect residents and the environment from mining facilities and hazardous materials.
- **Policy SA 5.1:** Encourage the use of pesticides consistent with State and Federal requirements and product-specific safety recommendations.
- **Policy SA 5.2:** Encourage local producers and users of hazardous materials to reduce the amounts of hazardous materials generated.
- **Policy SA 5.3:** Require hazardous waste generated within the City to be disposed of in a safe manner, consistent with all applicable local, State, and Federal laws.
- **Policy SA 5.4:** Require hazardous materials to be stored in a safe manner, consistent with all applicable local, State, and Federal laws.
- **Policy SA 5.5:** Require compliance with the Amador County Environmental Health Department's consolidated hazardous materials program.
- **Policy SA 5.6:** Work with the County and/or other agencies to limit the effects of former mining activities.

- **Policy LU 7.2:** Consider environmental justice issues related to potential adverse health impacts associated with land use decisions, including methods to reduce exposure to hazardous materials, industrial activities, vehicle exhaust, other sources of pollution, and excessive noise on residents regardless of age, culture, gender, race, socioeconomic status, or geographic location.
- **Policy COS 6.5:** Ensure that special waste – including hazardous materials, tires, medications, infectious waste, asbestos waste, construction waste, and electronic waste – are recycled and disposed of in a manner that is safe for the environment, residents, and employees.

Ione General Plan

- **Policy NS-2.1:** Strive to reduce levels of risk of injury, death, and property damage resulting from reasonably foreseeable safety hazards in the area.
- **Policy NS-2.3:** Prepare for emergencies and disasters prior to their occurrence.
- **Policy NS-2.5:** The City shall require written confirmation from applicable local, regional, state and federal agencies that known contaminated sites have been deemed remediated to a level appropriate for land uses proposed prior to the City approving site development. Alternatively, the City may require applicants to provide an approved remediation plan that demonstrates how contamination will be remediated prior to site occupancy. This documentation will specify the extent of development allowed on the remediated site as well as any special conditions and/or restrictions on future land uses.
- **Policy NS-5.3:** Ensure the safe storage of hazardous materials and waste.
- **Policy NS-5.6:** Ensure that procedures are in place to reduce the chance of accidents in the transport of hazardous materials.

Ione Municipal Code

Chapter 17.60.070 Performance Standards, M. Hazardous Materials. Hazardous materials may only be stored in amounts below the thresholds established by the local fire department.

5.8.1.2 EXISTING CONDITIONS

Current Uses on the Project Site

Argonaut High School

The project site consists of the existing Argonaut HS, which is surrounded by Residential Single Family with some Residential Low Density and Residential Medium Density uses north of the campus. Professional Offices are designated east of Argonaut Lane (Jackson 2015). See Chapter 3, *Project Description*.

Ione Junior High School

The project site consists of the existing Ione Junior HS, which has Low Density Residential (RL) directly north of the campus and Rural Residential to the southwest and is within a Special Planning Area (SPA). There is a small portion of General Commercial (GC) east of the campus (Ione 2009). See Chapter 3, *Project Description*.

Sutter Creek Elementary School

The project site consists of the existing Sutter Creek ES. Sutter Creek ES is surrounded by Residential Single Family (RSF) uses with Commercial (C) uses to the east and Amador HS, designated PS, directly south. See Chapter 3, *Project Description*.

Emergency Preparedness

The cities of Jackson, Sutter Creek and Ione have adopted the Amador County Local Hazards Mitigation Plan (LHMP) Update to reduce or eliminate long-term risk to people and property from hazards (Amador 2020). The 2020 LHMP is an update of the FEMA-approved 2014 LHMP. A Hazard Mitigation Planning Committee was formed to perform a risk assessment to identify hazards that pose a risk to Amador County and develop a plan to mitigate hazards such as floods, levee failures, wildfires, and severe weather. The committee includes members of Amador County, the Amador County Fire Council, Amador Water Agency and the cities of Jackson, Sutter Creek, Ione, and Plymouth. The LHMP Update identifies goals and objectives for assisting decision makers in directing mitigation activities and resources to reduce the county's vulnerability to hazards.

Amador County is in the process of preparing an emergency operations plan, which will serve as the primary document that discusses how disasters will be managed by the County (Amador 2023).

Argonaut High School

The City of Jackson does not have a local emergency operations plan. However, the Amador County Transportation Commission (ACTC) provides an overview of the county road system and illustrates evacuation routes in the City of Jackson. Argonaut Lane is a primary evacuation route that bounds Argonaut HS to the east and connects to an evacuation highway, State Route 88 (ACTC 2021a). ACTC does not recommend Stony Creek Road, which bounds the campus to the south, as an evacuation route. Additionally, Argonaut HS has a Comprehensive School Safety Plan (CSSP) with established procedures to minimize or nullify the effect of 44 emergencies (ACPS 2018a). The CSSP includes procedures for preparedness, prevention, and mitigation of natural hazards and hazardous material releases.

Ione Junior High School

The City of Ione does not have a local emergency operations plan, but the ACTC illustrates evacuation routes in Ione. The closest evacuation route to the school is West Marlette Street, a primary evacuation road that is 0.1 mile north of the project site (ACTC 2018b). Additionally, Ione Junior HS has a CSSP with procedures for preparedness, prevention, and mitigation of natural hazards and hazardous material releases (ACPS 2018b).

Sutter Creek Elementary School

The City of Sutter Creek does not have a local emergency operations plan, but the ACTC illustrates evacuation routes in Sutter Creek. Sutter Ione Road is a primary evacuation route that bounds Sutter Creek ES to the north and connects to an evacuation highway, State Route 49 (ACTC 2021c). Sutter Creek ES also has a CSSP with procedures for preparedness, prevention, and mitigation of natural hazards and hazardous material releases (ACPS 2018c).

Hazardous Materials and Sites

California Government Code Section 65962.5 requires that the following types of hazardous materials sites be compiled into a list: hazardous waste facilities subject to corrective action; hazardous waste discharges for which the State Water Quality Control Board has issued certain types of orders; public drinking water wells containing detectable levels of organic contaminants; underground storage tanks with reported unauthorized releases; and solid waste disposal facilities from which hazardous waste has migrated.

Five environmental databases were searched for hazardous materials sites on or within a 1,500-foot radius of the project sites at Argonaut HS, Jackson Junior HS, and Sutter Creek ES:

- GeoTracker. State Water Resources Control Board (SWRCB 2023)
- EnviroStor. Department of Toxic Substances Control (DTSC 2023)
- EJScreen. US Environmental Protection Agency (EPA 2023a)
- EnviroMapper.US Environmental Protection Agency (EPA 2023b)
- Solid Waste Information System (SWIS). California Department of Resources Recovery and Recycling (Cal Recycle 2023).

Argonaut High School

Based on a review of site inspection of the Argonaut Mine Superfund site (Weston 2015), Argonaut HS is approximately 200 feet west of the Tailing Area of the Superfund site, and the closest area of concern, AOC-1 (the ore storage area), is across Argonaut Lane and to the northeast (See Figure 5.8-1, *Argonaut Mine Tailings Area*). The AOC-1 has high concentrations of arsenic, although the highest concentrations are on the northern side of the five-acre parcel, away from Argonaut HS. DTSC conducted an investigation in 2011 at Argonaut HS to check the arsenic concentrations because of the proximity of AOC-1. DTSC collected 12 samples across the campus and determined that all 12 were below the site-specific investigation level for arsenic, and there was no significant health risk at the high school.

More recently, EPA conducted arsenic soil sampling at certain locations on the Argonaut HS. Arsenic soil concentration of concern for residential use are concentrations above 100 mg/kg. Of the 22 surface soil samples taken at Argonaut HS campus, only three EPA sampling locations are above 100 mg/kg (see Appendix G). These three elevated levels of arsenic are along the northern end of the campus and along west side of the

baseball diamond, which are areas that students frequent. As discussed in the correspondence, the elevated concentrations are not a concern. No other hazardous materials sites were found within a 1,500-foot radius of the Argonaut HS campus.

Ione Junior High School Site Improvements

Table 5.8-1 summarizes the hazardous waste sites within a 1,500-foot radius of Ione Junior HS.

Table 5.8-1 Hazardous Waste Sites Within a 1,500-Foot Radius of Ione Junior High School

Site Address	Database	Identifier	Cleanup Status	Proximity to Site
Ione Junior High School 450 South Mill Street, Ione, Ca 95640	GeoTracker	LUST Cleanup Site	Completed – Case Closed	On Campus
City of Ione Corporation Yard Mill Street & Marlette, Ione, CA	GeoTracker	Cleanup Program Site	Completed – Case Closed	500 feet
Lemoore Naval Air Station, Building 855, Lemoore, CA 93246	GeoTracker	Military UST Site	Completed – Case Closed	1,200 feet
Sierra Energy 116 Main Street W, Ione CA 95640	GeoTracker	LUST Cleanup Site	Completed – Case Closed	1,300 feet

Source: SWRCB 2023.

Sutter Creek Elementary School

Table 5.8-2 summaries the hazardous waste sites within a 1,500-foot radius of Sutter Creek ES.

Table 5.8-2 Hazardous Waste Sites Within a 1,500-Foot Radius of Sutter Creek Elementary School

Site Address	Database	Identifier	Cleanup Status	Proximity to Site
Amador High School 450 South Mill Street, Ione, Ca 95640	GeoTracker	LUST Cleanup Site	Completed – Case Closed	300 feet
Lincoln Mine Center State Route 49 next to Sutter Fire Department Station, Sutter Creek, CA 95685	EnviroStor	Voluntary Cleanup Site	Inactive – Needs Evaluation	700 feet

Source: SWRCB 2023; DTSC 2023.

Airport-Related Hazards

Argonaut High School

Westover Field (Amador County Airport) is approximately one mile north of the project site. The project site is within the Airport Safety Area, as shown on Figure LU-7, Westover Field Safety Zones, of the Amador County General Plan (Amador 2016).

Ione Junior High School Site Improvements

The Ranch Airstrip is approximately 2.3 miles southwest of the project site.

Sutter Creek Elementary School

Westover Field is approximately 1.7 miles southeast of the project site. However, the project site is not within the Airport Safety Area, as shown on Figure 4-2, Land Use Overlay Diagram, of the Sutter Creek General Plan (2019).

Wildfire Hazards

Argonaut High School

The project site is in a local responsibility area (LRA). It is not in a state responsibility area (SRA) or a designated Very High Fire Hazard Severity Zone (FHSZ) (Cal Fire 2023).

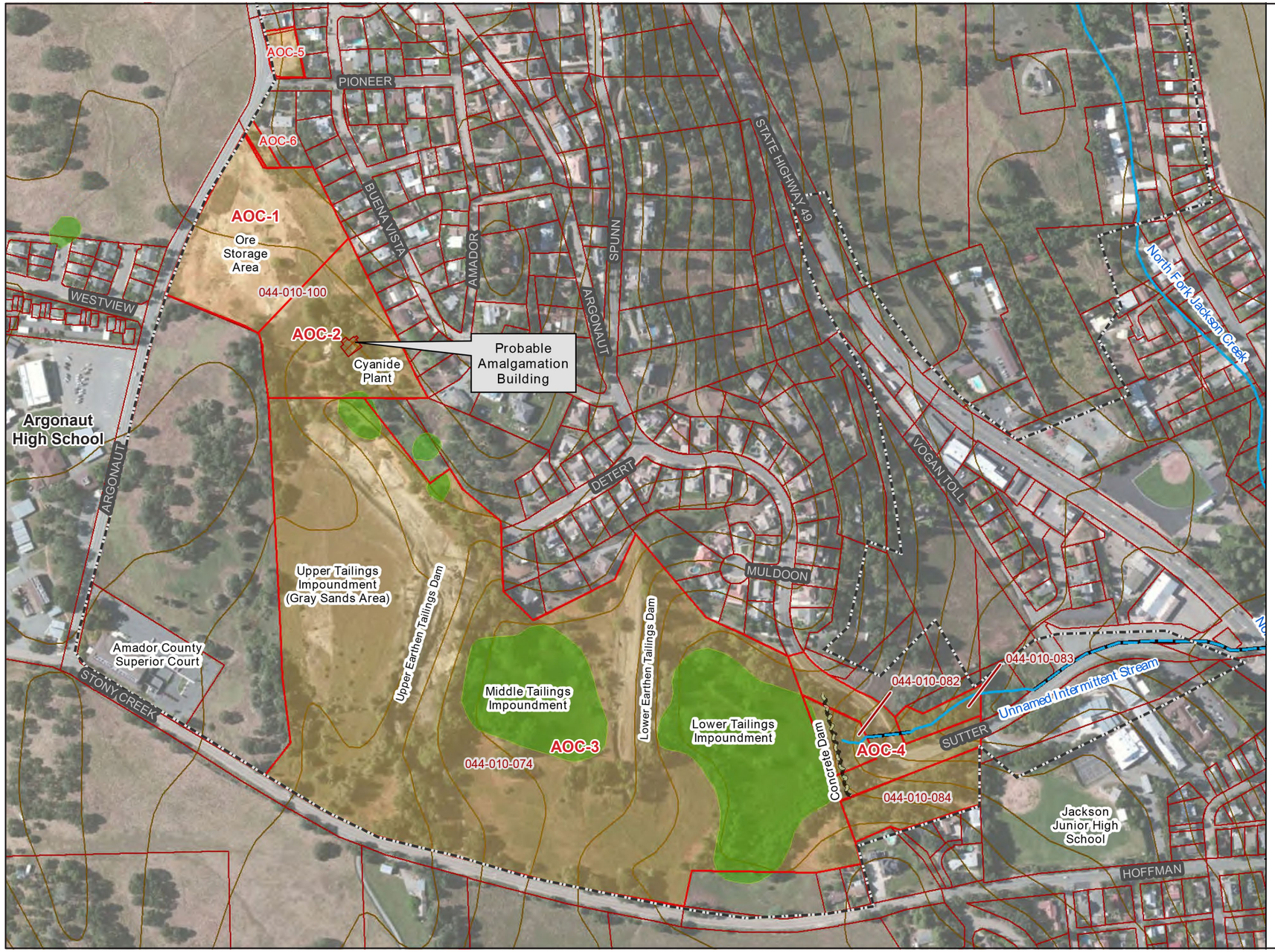
Ione Junior High School

The project site is in an LRA. It is not in an SRA or a designated very high FHSZ (Cal Fire 2023).

Sutter Creek Elementary School

The project site is in an LRA. It is not in an SRA or a designated very high FHSZ (Cal Fire 2023).

Figure 5.8-1 - Argonaut Mine Tailings Area



Source: Weston Solutions 2015.

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5.8.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

H-1 Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

H-2 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.

H-3 Emit hazardous emissions or handle hazardous or acutely hazardous materials, substance, or waste within one-quarter mile of an existing or proposed school.

H-4 Be located on a site which is included on a list of hazardous materials compiled pursuant to Government Code Section 65962.5 and, as a result, would create a significant hazard to the public or the environment.

H-5 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 result in a safety hazard or excessive noise for people residing or working in the project area.

H-6 Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

H-7 Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

5.8.3 Environmental Impacts

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.8.1: Project Implementation would not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials. [Thresholds H-1]

Argonaut High School Site Improvements

Construction Phase

Construction of the proposed project would require the use of hazardous materials such as vehicle fuels, lubricants, grease, transmission fluids, and paints and coatings. However, the materials used would not be in such quantities or stored in a manner that would pose a significant safety hazard. Their use would be short term or one time and would cease upon completion of the proposed project's construction phase. The handling, use, transport, and disposal of hazardous materials during the construction phase of the proposed project

would comply with existing regulations of several agencies—the EPA, Cal/OSHA, US Occupational Safety and Health Administration (OSHA), and USDOT.

The use, storage, transport, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations. Compliance with applicable laws and regulations would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. For example, all spills or leakage of petroleum products during construction activities must be immediately contained, the hazardous material identified, and the material remediated in compliance with state and local regulations. All contaminated waste would be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, adherence to all emergency response plan requirements of Amador County and the Amador Fire Protection Authority (AFPA) would be required throughout the project construction phase. Therefore, hazards to the public or the environment arising from the routine use of hazardous materials during project construction would be **less than significant**.

Operation Phase

Operation of the proposed project would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities, such as cleaning and maintenance supplies (cleaners, gasoline, paint, and pesticides). The proposed project includes various improvements to campus buildings, the addition of new buildings, and accessibility improvements that would use cleaners and other chemicals in relatively small quantities, which are not typically considered hazardous materials that could result in a significant hazard to the public or the environment. No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur on the campus. Compliance with applicable federal and State laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Therefore, the proposed project would not create substantial hazards to the public or the environment. Impacts would be **less than significant**.

Ione Junior High School Site Improvements

Construction Phase

Construction of the proposed project would require the use of hazardous materials during construction, such as vehicle fuels, lubricants, grease, transmission fluids, and paints and coatings. However, the materials used would not be in such quantities or stored in a manner that would pose a significant safety hazard. Their use be short term or one time and would cease upon completion of the proposed project's construction phase. The handling, use, transport, and disposal of hazardous materials during the construction phase of the proposed project would comply with existing regulations of several agencies—the EPA, Cal/OSHA, OSHA, and USDOT.

The use, storage, transport, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations. Compliance with applicable laws and regulations would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. For example, all spills or leakage of petroleum products during construction

activities must be immediately contained, the hazardous material identified, and the material remediated in compliance with state and local regulations. All contaminated waste would be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, adherence to all emergency response plan requirements of Amador County and the AFPA would be required throughout the project construction phase. Therefore, hazards to the public or the environment arising from the routine use of hazardous materials during project construction would be **less than significant**.

Operation Phase

Operation of the proposed project would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities, such as cleaning and maintenance supplies (cleaners, gasoline, paint, and pesticides). The proposed project includes various improvements to campus buildings, circulation improvements, and the addition of new buildings and play equipment that would use cleaners and other chemicals in relatively small quantities, which are not typically considered hazardous materials that could result in a significant hazard to the public or the environment. No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur on the campus. Compliance with applicable federal and State laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Therefore, the proposed project would not create substantial hazards to the public or the environment. Impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

Construction Phase

Construction of the proposed project would require the use of hazardous materials during construction, such as vehicle fuels, lubricants, grease and transmission fluids, and paints and coatings. However, the materials used would not be in such quantities or stored in a manner that would pose a significant safety hazard. Their use would also be short term or one time and would cease upon completion of the proposed project's construction phase. The handling, use, transport, and disposal of hazardous materials during the construction phase of the proposed project would comply with existing regulations of several agencies—the EPA Cal/OSHA, OSHA, and USDOT.

The use, storage, transport, and disposal of construction-related hazardous materials would be required to conform to existing laws and regulations. Compliance with applicable laws and regulations would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. For example, all spills or leakage of petroleum products during construction activities must be immediately contained, the hazardous material identified, and the material remediated in compliance with state and local regulations. All contaminated waste would be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, adherence to all emergency response plan requirements of Amador County and the AFPA would be required throughout the project construction phase. Therefore, hazards to the public or the environment arising from the routine use of hazardous materials during project construction would be **less than significant**.

Operation Phase

Operation of the proposed project would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities such as cleaning and maintenance supplies (cleaners, gasoline, paint and pesticides). The proposed project includes a new classroom building and a lunch shelter that would use cleaners and other chemicals in relatively small quantities, which are not typically considered hazardous materials that could result in a significant hazard to the public or the environment. No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur on the campus. Compliance with applicable federal and state laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Therefore, the proposed project would not create substantial hazards to the public or the environment. Impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than Significant Impact.

Impact 5.8-2: Project Implementation would not 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 [Threshold H-2]

Five environmental databases were searched for hazardous materials sites on or within a 1,500-foot radius of the project sites:

- GeoTracker. State Water Resources Control Board (SWRCB 2023)
- EnviroStor. Department of Toxic Substances Control (DTSC 2023)
- EJScreen. US Environmental Protection Agency (EPA 2023a)
- EnviroMapper.US Environmental Protection Agency (EPA 2023b)
- Solid Waste Information System (SWIS). California Department of Resources Recovery and Recycling (Cal Recycle 2023)

Argonaut High School Site Improvements

Based on a review of site inspection of the Amador Mine Superfund site (Weston 2015), Argonaut HS is approximately 200 feet west of the Superfund site, and the closest area of concern, AOC-1 (the ore storage area), is across Argonaut Lane and to the north. AOC-1 has high concentrations of arsenic. DTSC conducted an investigation in 2011 at Argonaut HS to check the arsenic concentrations because of the proximity of AOC-1. DTSC collected 12 samples across the campus whose arsenic levels ranged between -0.64 to 60 mg/kg. The EPA's site-specific screening level is set at 61 mg/kg, and the arsenic levels found on campus are below that level, so no significant health risk was present on the high school campus. In August 2013, the DTSC requested the EPA to conduct removal action at the Tailings Area, approximately 0.25 mile east of the project site. In September 2020 the EPA released "Cleanup Plan for a Portion of the Argonaut Mine Superfund Site" for public comment (EPA 2020). Cleanup of the Tailings Area would not occur on the Argonaut campus and would reduce future risk of exposure to hazardous materials. Therefore, these cleanup activities would not adversely affect the Argonaut campus. More recently, EPA conducted arsenic soil sampling at certain locations

on the Argonaut HS. Of the 22 surface soil samples taken at Argonaut HS campus, only three EPA sampling locations are above 100 mg/kg and a concern for residential use. However, the locations are not in areas that students frequent, and concentrations are not a concern at this time (see Appendix G). Further, the proposed site improvements at Argonaut HS would not disturb soils in these areas. No other hazardous materials sites were found within a 1,500-foot radius of the Argonaut HS campus.

As discussed in Impact 5.8.1, construction activities would require the use of hazardous materials, which include vehicle fuels, lubricants, grease and transmission fluids as well as paints and coatings. The use, transportation and disposal of hazardous materials would be in accordance with regulatory standards and manufacturers' specifications. Hazardous materials would be used in small quantities and properly stored so they do not reasonably pose health and safety hazards. Operation of the proposed project would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities, such as cleaning and maintenance supplies (such as cleaners, gasoline, paint and pesticides). Operation of the proposed project would use cleaners and other chemicals in relatively small quantities, which is not typically considered hazardous materials that could result in a significant hazard to the public or the environment. The use of hazardous materials during construction and operation would be at small quantities and would not 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. Compliance with applicable federal and State laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure impacts would be **less than significant**.

Ione Junior High School Site Improvements

As shown in Table 5.8-1, *Hazardous Waste Sites Within a 1,500-Foot Radius of Ione Junior High School,* GeoTracker identified four hazardous waste sites in the vicinity of the project site at Ione Junior HS—a cleanup program site, two LUST cleanup sites, and a military UST (SWRCB 2023). One of the LUST cleanup sites is on the Ione Junior HS campus. All four sites have a status of "completed – case closed," and no further action is warranted. No other hazardous material sites were identified within the vicinity of the project site at Ione Junior HS. Therefore, no additional hazardous waste cleanup or disposal is required, and impacts would be **less than significant**.

As discussed in Impact 5.8.1, construction activities would require the use of hazardous materials, which include vehicle fuels, lubricants, grease, and transmission fluids as well as paints and coatings. The use, transportation, and disposal of hazardous materials would be in accordance with regulatory standards and manufacturers' specifications. Hazardous materials would be used in small quantities and properly stored, so they do not reasonably pose health and safety hazards. Operation of the proposed project would transport, use, store and dispose of small amounts of hazardous materials typical of school facilities, such as cleaning and maintenance supplies (such as cleaners, gasoline, paint and pesticides). Operation of the proposed project would use cleaners and other chemicals in relatively small quantities, which is not typically considered hazardous materials that could result in a significant hazard to the public or the environment. The use of hazardous materials during construction and operation would be at small quantities and would not 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. Compliance with applicable federal and state laws and regulations

governing the use, storage, transport, and disposal of hazardous materials would ensure impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

As shown in Table 5.8-2, *Hazardous Waste Sites Within a 1,500-Foot Radius of Sutter Creek Elementary School,* the GeoTracker and EnviroStor databases identified two hazardous materials sites (SWRCB 2023; DTSC 2023). GeoTracker identified a single LUST cleanup site at Amador HS approximately 0.05 mile south. The LUST cleanup site is deemed "completed – case closed"; therefore, no additional hazardous waste cleanup or disposal at Amador HS is required. The EnviroStor database identified the Lincoln Mine Center as a voluntary cleanup site; this site is inactive and, as of August 1, 2016, the voluntary cleanup agreement was terminated. The Lincoln Mine Center was going to be remediated for elevated arsenic in shallow soils (DTSC 2023). The Lincoln Mine Center is covered with vegetation that would prevent erosional transport of soil with elevated arsenic and based on a review of the topographic map, is cross-gradient from the school site. Therefore, the proximity of the project site to the Lincoln Mine Center is not a significant concern. Construction of the site improvements at Sutter Creek ES would be at the existing Sutter Creek ES campus and would not require any construction or cleanup at the Lincoln Mine Center. Therefore, improvements at Sutter Creek ES would not create a significant hazard to the public or the environment due to the release of hazardous materials, and impacts would be **less than significant**.

As discussed in Impact 5.8.1, construction activities would require the use of hazardous materials, which include vehicle fuels, lubricants, grease, transmission fluids, and paints and coatings. The use, transport, and disposal of hazardous materials would be in accordance with regulatory standards and manufacturers' specifications. Hazardous materials would be used in small quantities and properly stored, so they do not reasonably pose health and safety hazards. Operation of the proposed project would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities, such as cleaning and maintenance supplies (such as cleaners, gasoline, paint and pesticides). Operation of the proposed project would use cleaners and other chemicals in relatively small quantities, which is not typically considered hazardous materials that could result in a significant hazard to the public or the environment. The use of hazardous materials during construction and operation would be at small quantities and would not 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. Compliance with applicable federal and state laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.8-3: Project Implementation would not handle hazardous or acutely hazardous materials, or substances, within one-quarter mile of an active school. [Threshold H-3]

Argonaut High School Site Improvements

The site improvements at Argonaut HS would be located entirely on the existing Argonaut HS campus. No other school campuses are within a 0.25 mile of the project site at Argonaut HS. As discussed in Impact 5.8.1,

construction and operation of the proposed project would handle hazardous materials typical of construction activities and school activities (during operation). The use, transport, and storage of hazardous materials would be required to comply with all applicable state and federal regulations, which would ensure the proper handling of such materials. As discussed in Impact 5.8.2, there is no evidence that a hazardous materials release or threatened release has occurred on the project site. The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Thus, impacts would be **less than significant**.

Ione Junior High School Site Improvements

The site improvements at Ione Junior HS would be located entirely on the existing Ione Junior HS campus. Ione ES is approximately 0.17 mile east of Ione Junior HS. However, the proposed project would relocate Ione ES students to Ione Junior HS and close Ione ES. Therefore, no active school campuses would be within 0.25 mile of Ione Junior HS campus.

As discussed in Impact 5.8.1, construction and operation of the proposed project would handle hazardous materials typical of construction activities and school activities (during operation). The use, transport, and storage of hazardous materials would be required to comply with all applicable State and federal regulations, which would ensure the proper handling of such materials. As discussed in Impact 5.8.2, all hazardous materials sites near the project site at Ione Junior HS have received case closure statuses; therefore, the potential for an hazardous materials release or threatened release at project site or within a 1,500-foot radius of the project site is less than significant. As discussed in Impact 5.8.2, there is no evidence that a hazardous materials release or threatened release has occurred on the project site or within a 1,500-foot radius of the project site. The proposed project would not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. Thus, impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

The site improvements at Sutter Creek ES would be entirely on the existing Sutter Creek ES campus. Amador HS is approximately 0.05 miles south of Sutter Creek ES. The District proposes to expand Sutter Creek ES to create a TK through sixth grade campus. As discussed in Impact 5.8.1, construction and operation of the proposed project would handle hazardous materials typical of construction activities and scholastic activities (during operation). The use, transportation and storage of hazardous materials would be required to comply with all applicable state and federal regulations that would ensure the proper handling of such materials. As discussed in Impact 5.8.2, all hazardous materials sites have been cleaned and are considered closed cases; therefore, the potential for a hazardous materials release or threatened release at project site or within a 1,500-foot radius of the project site is less than significant. Thus, the proposed project would not emit hazardous materials and adherence with state and federal regulations while handling handle hazardous or acutely hazardous materials, substances, or waste would be **less than significant**.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.8-4: Project Implementation would not pose a significant hazard to the public or the environment. [Threshold H-4]

Five environmental databases were searched for hazardous materials sites on or within 1,500-foot radius of the project sites:

- GeoTracker. State Water Resources Control Board (SWRCB 2023)
- EnviroStor. Department of Toxic Substances Control (DTSC 2023)
- EJScreen US Environmental Protection Agency (EPA 2023a)
- EnviroMapper.US Environmental Protection Agency (EPA 2023b)
- Solid Waste Information System (SWIS). California Department of Resources Recovery and Recycling (Cal Recycle 2023).

Argonaut High School Site Improvements

As discussed in Impact 5.8.2, a search of the five databases showed no evidence of hazardous materials release or threatened release on the project site or within a 1,500-foot radius of Argonaut HS. Additionally, the Tailings Area or the Amador Mine Superfund site presents no significant health risk. The project site is not located on a hazardous material site; therefore, impacts would be less than significant.

Ione Junior High School Site Improvements

As discussed in Impact 5.8.2, a search of the five databases identified four sites in the vicinity of the project site which includes a cleanup program site, two LUST cleanup sites, and a military UST. All four sites identified by Geotracker have a status of "completed – case closed," and no further action is warranted. No other hazardous material sites were identified. Therefore, no additional hazardous waste cleanup or disposal is required and impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

As discussed in Impact 5.8.2, a search of the five databases identified two hazardous materials sites in the vicinity of the project site at Sutter Creek ES—a LUST cleanup site and a voluntary cleanup site. The LUST cleanup site at Amador HS is approximately 0.1 mile south and deemed "completed – case closed." No additional hazardous waste cleanup or disposal at Amador HS is required.

The voluntary cleanup site at Lincoln Mine Center is inactive, and as of August, 1 2016 the voluntary cleanup agreement was terminated. Construction of the proposed project would be located at the existing Sutter Creek ES campus and would not require any construction or cleanup at the Lincoln Mine Center. The project site is not located on a hazardous material site; therefore, impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.8-5: Project Implementation would not conflict with an airport land use plan. [Threshold H-5]

Argonaut High School Site Improvements

Argonaut HS is approximately one mile south of Westover Field (Amador County Airport), a public airport. As shown in Figure LU-7, Westover Field Safety Zones, of the Amador County General Plan, the Argonaut HS site is within the Airport Safety Area 3 (overflight zone) (Amador 2016). Schools are considered compatible land uses within the Airport Safety Area 3 (Amador County Airport LUC 1990). However, the proposed project is not within the clear zone or the approach/departure zone (Safety Area 1 or Safety Area 2) and is not required to comply with the additional land use restrictions. Additionally, the proposed site improvements would not exceed the height restriction of 200 feet above the ground level at the site t. The proposed project would adhere to the Westover Field Airport Land Use Plan and impacts would be **less than significant**.

Ione Junior High School Site Improvements

Ione Junior HS is not in the vicinity of an airport. The closest airport, the Ranch Airstrip, is approximately 2.3 miles southwest of the Ione Junior HS. Therefore, the site improvements at Ione Junior HS would not result in a safety hazard or excessive noise for the Ione Junior HS campus. **No Impact** would occur.

Sutter Creek Elementary School Site Improvements

The Sutter Creek ES is approximately 1.70 miles southeast of Westover Field. However, the project site is not within the Airport Safety Area, as shown on Figure 4-2, Land Use Overlay Diagram, of the Sutter Creek General Plan (2019). Therefore, **a less than significant** impact would occur.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.8-6: Project Implementation would not impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. [Threshold H-6]

School Closure/Consolidation Program Project

The potential for the overall proposed project to impair the implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan is evaluated in Chapter 5.15, *Transportation.*

Argonaut High School Site Improvements

The Argonaut HS campus is in the City of Jackson, which adopted the Amador County LHMP Update to reduce or eliminate long-term risk to people and property from hazards (Amador 2020). The LHMP Update identifies key hazards within Amador County to mitigate such as floods, levee failures, wildfires, and severe weather. The LHMP Update identifies goals and objectives for assisting decision makers in directing mitigation activities and resources to reduce the Country's vulnerability to hazards. Additionally, Argonaut HS has a CSSP that established procedures to minimize the effect of 44 emergencies (ACPS 2018a). The CSSP includes procedures for preparedness, prevention, and mitigation of natural hazards and hazardous material releases.

The proposed project would adhere to the plans and policies of the LHMP Update and CSSP during construction and operation.

ACTC provides an overview of the county road system and illustrates evacuation routes within the City of Jackson. Argonaut Lane is a primary evacuation route that bounds Argonaut HS to the east and connects to an evacuation highway, State Route 88 (ACTC 2021a). ACTC does not identify Stony Creek Road, which bounds the campus to the south, as an evacuation route. Construction activities associated with the proposed project, including staging and stockpiling, would occur within the boundaries of Argonaut HS campus and would not impact surrounding roadways that could be used during potential emergency situations. The site improvements would include a new driveway that would connect to Stony Creek Road and a roadway connecting both parking lots on campus. The construction and operation of this new driveway would be required to adhere to California traffic laws, and vehicles exiting on this driveway would be required to yield to vehicles traveling along Stony Creek Road, including emergency vehicles. The proposed project would also be required to provide adequate access for emergency vehicles per the California Fire Code.

The proposed project includes on-site circulation improvements, which would improve the ability for emergency vehicles and services to serve the Argonaut HS. The proposed project would comply with the California Department of Education (CDE) guidelines for site design and circulation. DSA would review the project plans to ensure adequate emergency access and circulation during operation. Additionally, the development of the proposed project would be required to incorporate all applicable design and safety requirements from the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed project would have a **less than significant impact**.

Ione Junior High School Site Improvements

The Ione Junior HS campus is in the City of Ione, which adopted the Amador County LHMP Update to reduce or eliminate long-term risk to people and property from hazards (Amador 2020). Ione Junior HS also has a CSSP that established procedures to minimize the effect of emergencies (ACPS 2018b). The CSSP includes procedures for preparedness, prevention, and mitigation of natural hazards and hazardous material releases. The proposed project would adhere to the plans and policies of the LHMP update and CSSP during construction and operation.

ACTC provides an overview of the county road system and illustrates evacuation routes within the City of Ione. The closest evacuation route is West Marlette Street, a primary evacuation road that is approximately 0.1 mile north of the project site (ACTC 2021b). Construction activities associated with the proposed project, including staging and stockpiling, would occur within the boundaries of Ione Junior HS and would not impact surrounding roadways that could be used during potential emergency situations. The proposed project would also be required to provide adequate access for emergency vehicles per the California Fire Code.

The proposed project would not alter the existing access on site. The proposed project includes the expansion of the parent drop-off/pick-up areas. The proposed project would comply with the CDE guidelines for site design and circulation. DSA would review the project plans to ensure adequate emergency access and circulation

during operation. Additionally, the development of the proposed project would be required to incorporate all applicable design and safety requirements from the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed project would have a **less than significant impact**.

Sutter Creek Elementary School Site Improvements

The Sutter Creek ES campus is in the City of Sutter Creek, which adopted the Amador County LHMP update to reduce or eliminate long-term risk to people and property from hazards (Amador 2020). Additionally, Sutter Creek ES has a CSSP which established procedures to minimize the effect of emergencies (ACPS 2018c). The CSSP includes procedures for preparedness, prevention, and mitigation of natural hazards and hazardous material releases. The proposed project would adhere to the plans and policies of the LHMP update and CSSP during construction and operation.

ACTC provides an overview of the county road system and illustrates evacuation routes in Sutter Creek. Sutter Ione Road is a primary evacuation route that bounds Sutter Creek ES on the north and connects to an evacuation highway State Route 49 (ACTC 2021c). Construction activities associated with the proposed project, including staging and stockpiling, would occur within the boundaries of Sutter Creek ES and would not impact surrounding roadways that could be used during potential emergency situations. The proposed project would also be required to provide adequate access for emergency vehicles per the California Fire Code.

The proposed project would not alter the existing circulation or access on-site. The proposed project would comply with the CDE guidelines for site design and circulation. DSA would review the project plans to ensure adequate emergency access and circulation during operation. Additionally, the proposed project would be required to incorporate all applicable design and safety requirements from the most current adopted fire codes, building codes, and nationally recognized fire and life safety standards. Therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. The proposed project would have a **less than significant impact**.

Level of Significance Before Mitigation: Less than Significant Impact.

Impact 5.8-7: Project Implementation would not expose structures and/or residences to wildfire. [Threshold H-7]

Argonaut High School Site Improvements

The project site is in an LRA; it is not in an SRA or very high FHSZ (Cal Fire 2023). The nearest FHSZ is approximately 1.75 miles southwest of the project site and designated a very high FHSZ in an SRA.

The purpose of the proposed project is to support existing ACUSD students, staff, and school community. It would consolidate Amador HS and Argonaut HS at Argonaut HS, increase student capacity and teaching staff, and require new classroom buildings and building improvements. The proposed structures would be typical of high school campus, such as a two-story classroom building, portable classrooms, and other on-site

improvements. Structures on-site and emergency access would be designed and constructed in accordance with the California Building Code and Fire Code. As further discussed in Section 5.18, *Wildfire,* the Argonaut HS campus is within an wildland-urban interface zone; and future development under the proposed project would be required to comply with the requirements of Chapter 49 of the Fire Code, including requirements for fire protection plans. Adherence to the applicable requirements of the California Fire Code will be ensured through the DSA's review of building permits. Project plans would be reviewed by DSA to ensure adequate emergency access. As further discussed in Section 5.13, *Public Services*, the proposed project would be adequately served by the Jackson Fire Department. Therefore, the proposed project would not expose people or structures to significant risk of loss, injury, or death involving wildland fires, and a **less than significant** impact would occur.

Ione Junior High School Site Improvements

The project site is in an LRA; it is not in an SRA or very high FHSZ (Cal Fire 2023). The nearest FHSZ is designated a very high FHSZ in an LRA and is approximately 2.3 miles north of the project site.

The purpose of the proposed project is to support existing ACUSD students, staff, and school community. The proposed project would relocate Ione ES to Ione Junior HS and would add preschool and transitional kindergarten (TK) to the campus. The proposed project would increase student capacity at the Ione Junior HS campus, requiring new classroom buildings and building improvements. The proposed structures are typical of junior high school campus, such as a new classroom building, playground for preschool, TK, and expand the parent drop-off/pick-up areas. Structures on site and emergency access would be designed and constructed in accordance with the California Building Code and Fire Code. Project plans would be reviewed by DSA to ensure adequate emergency access. As further discussed in Section 5.13, *Public Services*, the proposed project would be adequately served by the Ione Fire Department. Therefore, the proposed project would not expose people or structures significant risk of loss, injury or death involving wildland fires, and a **less than significant** impact would occur.

Sutter Creek Elementary School Site Improvements

The project site is in an LRA; it is not in an SRA or very high FHSZ (Cal Fire 2023). The nearest FHSZ is approximately 2.5 miles northeast of the project site and is designated a very high FHSZ in an SRA.

The purpose of the proposed project is to support existing ACUSD students, staff, and school community. The proposed project would expand Sutter Creek ES to create a TK through 6 grade campus. The proposed project would increase student capacity and teaching staff at the Sutter Creek ES campus, requiring new classroom buildings and building improvements. The proposed structures are typical of elementary school campus, such as a new classroom building, and a lunch shelter. Structures on-site and emergency access would be designed and constructed in accordance with the California Building Code and Fire Code. As further discussed in Section 5.18, *Wildfire,* the Sutter Creek ES campus is within an wildland-urban interface zone; and future development under the proposed project would be required to comply with the requirements of Chapter 49 of the Fire Code, including requirements for fire protection plans. Adherence to the applicable requirements of the California Fire Code will be ensured through the DSA's review of building permits. As further discussed in Section 5.13, Public Services, the proposed project would be adequately served by the Sutter Creek Fire

Protection District. Therefore, the proposed project would not expose people or structures significant risk of loss, injury or death involving wildland fires, and a **less than significant** impact would occur.

Level of Significance Before Mitigation: Less than significant impact.

5.8.4 Mitigation Measures

No mitigation measures would be required.

5.8.5 Level of Significance After Mitigation

No mitigation measures are required and the impact remains at less than significant.

5.8.6 Cumulative Impacts

Hazards and hazardous waste impacts are typically unique to each site and do not usually contribute to cumulative impacts. Cumulative development projects would be required to assess potential hazardous materials impacts on the development site prior to grading. Like the proposed project, other development projects would be required to comply with laws and regulations governing the use and handling hazardous materials and hazardous waste. Other development projects would be required to comply with applicable local Airport Land Use Plans. Other development projects would be required to comply with the adopted emergency response plans or emergency evacuation plans and the California Building Code and Fire Code to prevent significant risk of loss, injury, or death involving wildland fires. Therefore, the proposed project would not create cumulatively considerable hazards and hazardous materials impact. Impacts would be less than significant with regulatory compliance.

5.8.7 References

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5. Environmental Analysis
HAZARDS AND HAZARDOUS MATERIALS

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5.9 HYDROLOGY AND WATER QUALITY

This section evaluates the potential impacts of the proposed project on hydrology and water quality conditions associated with the project construction and project operation at Argonaut HS, Ione Junior HS, and Sutter Creek ES. Hydrology deals with the distribution and circulation of water, both on land and underground. Water quality deals with the quality of surface- and groundwater. Surface water includes lakes, rivers, streams, and creeks; groundwater is under the earth's surface. Potential project impacts and appropriate mitigation measures or standard conditions are included as necessary.

5.9.1 Environmental Setting

5.9.1.1 REGULATORY BACKGROUND

Federal

Clean Water Act

The Clean Water Act (CWA) is a 1977 amendment to the Federal Water Pollution Control Act of 1972. The CWA is the principal statute governing water quality. It establishes the basic structure for regulating discharges of pollutants into the waters of the United States[1] and gives the federal Environmental Protection Agency (EPA) the authority to implement pollution-control programs, such as setting wastewater standards for industry. The statute's goal is to end all discharges entirely and to restore, maintain, and preserve the integrity of the nation's waters. The CWA regulates both the direct and indirect discharge of pollutants into the nation's waters. The CWA sets water quality standards for all contaminants in surface waters and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a permit is obtained under its provisions. The CWA mandates permits for wastewater and stormwater discharges, requires states to establish site-specific water quality standards for navigable bodies of water, and regulates other activities that affect water quality, such as dredging and the filling of wetlands. The CWA also funded the construction of sewage treatment plants and recognized the need for planning to address nonpoint sources of pollution. The following CWA sections assist in ensuring water quality in surrounding water bodies.

- **Section 208** of the CWA requires the use of best management practices (BMPs) to control discharge of pollutants in stormwater during construction.
- **Section 303(d)** requires creation of a list of impaired water bodies by states, territories, and authorized tribes; evaluation of lawful activities that may impact impaired water bodies;[2] and preparation of plans to improve the quality of these water bodies. Water bodies on the list do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution-control technology.

[1] Waters of the US generally include surface waters—lakes, rivers, streams, bays, the ocean, dry streambeds, wetlands—and storm sewers that are tributary to any surface water body.

[2] Impaired water bodies are water bodies that do not meet or are not expected to meet water quality standards.

- **Section 401(a)(1)** of the CWA specifies that any applicant for a federal license or permit to conduct any activities that may result in any discharge into navigable waters shall provide the federal permitting agency with a certification, issued by the state in which the discharge originates, that any such discharge will comply with the applicable provisions of the CWA. In California, the applicable RWQCB must certify that the project will comply with water quality standards. Permits requiring Section 401 certification include USACE Section 404 permits and National Pollutant Discharge Elimination System (NPDES) permits issued by the EPA under Section 402 of the CWA. NPDES permits are issued by the applicable RWQCB.

- **Section 402(p)** establishes a framework to control water pollution by regulating point-source discharges under the NPDES permit program. Point-source discharges are readily identifiable, discrete inputs where waste is discharged to the receiving waters from a pipe or drain. Nonpoint discharges occur over a wide area and are associated with particular land uses (such as urban runoff from streets and stormwater from construction sites).

- **Section 404** – the USACE regulates discharge of dredge or fill material into "waters of the United States." Any filling or dredging within waters of the United States requires a permit, which entails assessment of potential adverse impacts to USACE wetlands and jurisdictional waters and any mitigation measures that the USACE requires. Section 7 consultation with the U.S. Fish and Wildlife Service may be required for impacts to a federally listed species. When a Section 404 permit is required, a Section 401 Water Quality Certification is also required from the RWQCB.

National Pollution Discharge Elimination System

Under the NPDES program (Section 402 of the CWA), all facilities that discharge pollutants from any point source into waters of the U.S. must have a NPDES permit. The term "pollutant" broadly applies to any type of industrial, municipal, and agricultural waste discharged into water. Point sources can be publicly owned treatment works (POTWs), industrial facilities, and urban runoff. The NPDES program addresses certain agricultural activities, but the majority are considered nonpoint sources and are exempt from NPDES regulation. Direct sources discharge directly to receiving waters, and indirect sources discharge to POTWs, which in turn discharge to receiving waters. Under the national program, NPDES permits are issued only for direct, point-source discharges. The NPDES has a variety of measures designed to minimize and reduce pollutant discharges. All counties with storm drain systems that serve a population of 50,000 or more, as well as construction sites one acre or more in size, must file for and obtain an NPDES permit.

National Flood Insurance Program

The Federal Emergency Management Agency (FEMA) administers the National Flood Insurance Program, which provides subsidized flood insurance to communities that comply with FEMA regulations regarding development in floodplains. FEMA also issues Flood Insurance Rate Maps (FIRMs) that identify which land areas are subject to flooding. These maps provide flood information and identify flood hazard zones in the community. The design standard for flood protection established by FEMA is the 100-year flood event, also described as a flood that has a 1-in-100 chance of occurring in any given year.

State

State Water Resources Control Board

Responsibility for the protection of water quality in California rests with the State Water Resources Control Board (SWRCB) and nine Regional Water Quality Control Boards (RWQCB). The SWRCB establishes statewide policies and regulations for the implementation of water quality control programs mandated by federal and State water quality statutes and regulations. The RWQCBs develop and implement Water Quality Control Plans (Basin Plans) that consider regional beneficial uses, water quality characteristics, and water quality problems. In cases where the Basin Plan does not contain a standard for a particular pollutant, other criteria are used to establish a standard. Other criteria may be applied from SWRCB documents (e.g., the Inland Surface Waters Plan and the Pollutant Policy Document, California Toxics Rule) or from EPA water quality criteria developed under Section 304(a) of the CWA. Numeric criteria are required by the CWA for many priority toxic pollutants. To fill in the gap between the water quality control plans and CWA requirements, on May 18, 2000, the EPA promulgated the California Toxics Rule based on the Administrator's determination that numeric criteria are necessary in California to protect human health and the environment. These federal criteria are numeric water quality criteria for priority toxic pollutants and other provisions for water quality standards legally applicable in California for inland surface waters, enclosed bays, and estuaries for all purposes and programs under the CWA.

Sustainable Groundwater Management Act

The Sustainable Groundwater Management Act (SGMA) of 2014 passed in September 2014 and is a comprehensive three-bill package that provides a framework for the sustainable management of groundwater supplies by local authorities. The SGMA requires the formation of local groundwater sustainability agencies (GSA) to assess local water basin conditions and adopt locally based management plans. The SGMA gives GSAs 20 years to implement plans, achieve long-term groundwater sustainability, and protect existing surface water and groundwater rights. The SGMA also provides local GSAs with the authority to require registration of groundwater wells, measure and manage extractions, require reports and assess fees, and request revisions of basin boundaries, including establishing new subbasins. Furthermore, under the SGMA, GSAs responsible for high- and medium-priority basins must adopt groundwater sustainability plans (GSP) within five to seven years, depending on whether the basin is in critical overdraft.

Porter-Cologne Water Quality Control Act

The Porter-Cologne Water Quality Control Act (Water Code Sections 13000 et seq.) is the basic water quality control law for California. Under this act, the SWRCB has ultimate control over state water rights and water quality policy. In California, the EPA has delegated authority to issue NPDES permits to the SWRCB. The state is divided into nine regions related to water quality and quantity characteristics. The SWRCB, through its nine RWQCBs, carries out the regulation, protection, and administration of water quality in each region. Each regional board is required to adopt a Water Quality Control Plan or Basin Plan that recognizes and reflects the regional differences in existing water quality, the beneficial uses of the region's ground and surface water, and local water quality conditions and problems. The proposed project's site lies within the jurisdiction of the Los Angeles RWQCB (Region 4).

Waste Discharge Requirements

All dischargers of waste to waters of the State are subject to regulation under the Porter-Cologne Act and the requirement for waste discharge requirements (WDRs) is incorporated into the California Water Code. This includes both point and non-point source (NPS) dischargers. All current and proposed NPS discharges to land must be regulated under WDRs, waivers of WDRs, a Basin Plan prohibition, or some combination of these administrative tools. Discharges of waste directly to state waters would be subject to an individual or general NPDES permit, which also serves as WDRs. The proposed project is subject to the Municipal Stormwater NPDES Permit and the Construction General Permit (CGP), which both also serve as WDRs.

The RWQCBs have primary responsibility for issuing WDRs. The RWQCBs may issue individual WDRs to cover individual discharges or general WDRs to cover a category of discharges. WDRs may include effluent limitations or other requirements that are designed to implement applicable water quality control plans, including designated beneficial uses and the water quality objectives established to protect those uses and prevent the creation of nuisance conditions. Violations of WDRs may be addressed by issuing Cleanup and Abatement Orders or Cease and Desist Orders, assessing administrative civil liability, or seeking imposition of judicial civil liability or judicial injunctive relief.

Statewide NPDES General Construction Activity Stormwater Permit

Pursuant to the CWA Section 402(p) and as related to the goals of the Porter-Cologne Water Quality Control Act, the SWRCB has issued a statewide NPDES General Permit for Stormwater Discharges Associated with Construction and Land Disturbance Activities (CGP – Order No. 2022-0057-DWQ, NPDES No. CAS000002), which was adopted September 8, 2022, and becomes effective on September 1, 2023. Every construction project that disturbs one acre or more of land requires coverage under the CGP. Construction activities subject to the CGP include clearing, grading, and excavation activities that could result in erosion or siltation impacts. Under the terms of the permit, applicants must file Permit Registration Documents (PRDs) with the SWRCB prior to the start of construction. The PRDs include a Notice of Intent, risk assessment, site map, Stormwater Pollution Prevention Plan (SWPPP), annual fee, and a signed certification statement. The PRDs are submitted electronically to the SWRCB via the Stormwater Multiple Application and Report Tracking System (SMARTS) website. Because the proposed project would disturb more than one acre, construction would be subject to the CGP requirements.

The SWPPP must include applicable best management practices (BMPs) depending on the project's sediment risk to receiving waters. BMPs are intended to reduce impacts from erosion and siltation to the maximum extent practicable. Additionally, the SWPPP must contain a weekly visual monitoring program and BMP inspections prior to, during, and after qualifying precipitation events. Water quality monitoring is also required with a schedule that is based on the risk level of the site.

For all sites that are not covered by a Phase I or Phase II MS4 permit, the project must implement post-construction stormwater performance standards as stated in the CGP. This is applicable for all K-12 schools and community colleges, which includes the proposed project.

State Water Resources Control Board Trash Amendments

On April 7, 2015, the SWRCB adopted an amendment to the Water Quality Control Plan for Ocean Waters of California to control trash and Part 1, Trash Provisions, of the Water Quality Control Plan for Inland Surface Waters, Enclosed Bays, and Estuaries of California. Together, they are collectively referred to as "the Trash Amendments." The Trash Amendments apply to all surface waters of California and include a land-use-based compliance approach to focus trash controls on areas with high trash-generation rates. Areas such as high-density residential, industrial, commercial, mixed urban, and public transportation stations are considered priority land uses. The City has incorporated in their Municipal Code that any structural or treatment-control BMP used for stormwater mitigation must include a full-capture trash system.

Water Conservation in Landscaping Act of 2006

The Water Conservation in Landscaping Act includes the State of California's Model Water-Efficient Landscape Ordinance (MWELO), which requires cities and counties to adopt landscape water conservation ordinances. The MWELO was revised in July 2015 via Executive Order B-29-15 to address the ongoing drought and build resiliency for future droughts. State law requires all land use agencies, which includes cities and counties, to adopt a water-efficient landscape ordinance that is at least as efficient as the MWELO prepared by the California Department of Water Resources (DWR). The 2015 revisions to the MWELO improve water conservation in the landscaping sector by promoting efficient landscapes in new developments and retrofitted landscapes. The revisions increase water efficiency by requiring more efficient irrigation systems, incentives for grey water usage, improvements in on-site stormwater capture, and limiting the portion of landscapes that can be covered in high-water-use plants and turf. This applies to residential, commercial, industrial, and institutional projects that require a permit, plan check, or design review. The previous landscape size threshold for new development projects ranged from 2,500 to 5,000 square feet. The size threshold for rehabilitated landscapes has not changed and remains at 2,500 square feet.

Regional

Municipal Stormwater NPDES Permit

Stormwater discharges from the County of Amador are regulated under the Waste Discharge Requirements for Municipal Stormwater and Urban Runoff Discharges within the Central Valley Region, issued by the Central Valley RWQCB. The Permittees are required to effectively prohibit non-stormwater discharges into the municipal storm drain system.

Although the proposed project is in Amador County, all California K-12 school districts and community college districts are not currently subject to the requirements of the MS4 permit. The SWRCB is in the process of expanding the Phase II Small MS4 permit to include school districts and community colleges. Once the amendment is adopted, school districts and community college districts will have five years to comply with the Phase II Small MS4 permit.

The new permit would require school districts and community college districts to develop a Stormwater Management Plan that includes: (1) a map of stormwater drainage on school properties, (2) identifying areas throughout the district that could generate stormwater pollution, (3) training staff on stormwater BMPs, (4) continuing to implement the SWRCB's CGP, (5) designing and building new construction to meet the permit requirements for stormwater runoff quality and quantity, and (6) documenting activities and submitting an annual report to the SWRCB.

Prior to issuance of the new Phase II MS4 permit, the proposed project would be required to comply with the provisions of the SWRCB's post-construction stormwater performance standards. Once the new permit is issued, it is expected that the school districts and community college districts would have to comply with requirements similar to those specified in Section F.5.g—Post-Construction Stormwater Management Program (SWMP)—of the existing Phase II MS4 permit. This provision specifies site design and low-impact development design standards, source-control measures, and sizing criteria for stormwater retention and treatment.

Water Quality Control Plan for the Sacramento-San Joaquin River Basins (Basin Plan)

The Water Quality Control Plan for the Sacramento-San Joaquin River Basins, also known as the Basin Plan, covers all the drainage basin areas for the Sacramento and San Joaquin Rivers, extending approximately 400 miles from the California-Oregon border to the headwaters of the San Joaquin River. This plan implements several federal and State laws, the most important of which are the state Porter-Cologne Act and the federal CWA. The Basin Plan (1975, and as revised in February 2019 with approved amendments) was adopted by the Regional Central Valley Water Board. The Basin Plan establishes water quality objectives for surface water and groundwater, and implementation programs to meet stated objectives and to protect the beneficial uses of water in the Sacramento River Basin, Sacramento-San Joaquin Delta Basin, San Joaquin River Basin, and Tulare Lake Basin.

Local

Jackson General Plan

The Safety Element of the Jackson General Plan (1981) contains policies related to storm drainage and hydrology. "It is the policy of the City of Jackson to maintain the storm drainage capacity of the floodway along Jackson Creek and its branches; promote the maintenance of the floodway clear of trash and debris that would detract from the appearance of the area and might reduce the drainage capacity of the natural channel; and maintain surveillance of the floodways to ensure that encroachment or alterations do not occur which would reduce the drainage capacity of the floodways or alter the forces of the flood waters, creating new erosion patterns which would damage property" (Jackson 1981).

The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals, policies, and actions related to hydrology are outlined here (Jackson 2023).

- **Policy LU-6.2:** Require development, infrastructure, and long-term planning projects to be consistent with all applicable infrastructure plans, including the Amador Water Agency Urban Water Management Plan and the City's capital improvement programs.
- **Goal COS-7:** Preserve and protect water resources and water quality in the Jackson Planning Area.
- **Policy COS-7.1:** Protect floodways and other areas with high groundwater water recharge capability.
- **Policy COS-7.2:** Require discretionary projects, as well as new flood control and stormwater conveyance projects, to integrate best management practices (BMPs) and natural features to the greatest extent feasible, while ensuring that these features adequately convey and control stormwater to protect human health, safety, and welfare.
- **Policy COS-7.3:** Protect surface water quality and prioritize the use of natural features such as bioswales, vegetation, retention ponds, and other measures to remove surface water pollutants prior to discharge into surface waters.
- **Policy COS-7.4:** Promote water conservation among water users.
- **Policy COS-7.5:** Support and promote the use of drought-tolerant and regionally native plants in landscaping.
- **Policy COS-7.6:** Where feasible, encourage and support multipurpose detention basins that provide water quality protection, storm water detention, open space amenities, and recreational amenities.
- **Policy COS-7.7:** Monitor groundwater extraction activities, encourage groundwater recharge, and ensure the health of the groundwater basin.
- **Policy SA 4.4:** Ensure that adequate water supplies are available for fire suppression throughout the City.
- **Policy SA 4.5:** Support efforts to remedy any deficiencies in the water delivery system to ensure adequate fire suppression flows.

Jackson Municipal Code

Projects within the City of Jackson must also comply with the following requirements of the City's Municipal Code:

- **17.30.050 Drainage and Storm Water Runoff.** All applications for a Zoning Clearance, Development Permit, Minor Use Permit, or Use Permit, except single-family dwellings, secondary residential units, and duplexes, shall include drainage and erosion control plans, which shall be submitted to the Engineering Department for review. This section establishes runoff treatment and erosion-control measures and standards prescribed to reduce impacts associated with runoff. In addition, this chapter provides

watercourse protection measures, including maintenance, timing of operations, and limitations on runoff standards to ensure the proper conveyance, treatment, and disposal of stormwater.

- **17.40.040.15 Stormwater Management and Rainwater Retention.** This chapter requires the inclusion of BMPs into landscape and grading design plans to minimize runoff and increase on-site rainwater retention and infiltration.

- **17.40.040.7 Grading Design Plan.** For the efficient use of water, grading of a project site shall be designed to minimize soil erosion, runoff, and water waste. A grading plan shall be submitted as part of the Landscape Documentation Package to illustrate the height of graded slopes, drainage patterns, pad elevations, finished grades, and stormwater retention improvements, if applicable. A comprehensive grading plan prepared by a civil engineer for other local agency permits satisfies this requirement, with adherence to Ordinance 725 Section 3, 2022.

- **13.20.170 Prohibited Sewage—Stormwater or Washwater.** Stormwater or pavement washwater shall not be introduced into the sanitary sewer system. Connection of roof drains or surface water drains is prohibited. Any person, firm, or corporation having a roof or surface drain now connected shall disconnect the same within 30 days of the date of the ordinance codified in this chapter. The resultant opening left in the sanitary sewer shall be closed by city maintenance personnel. (Ord. 548 Section 1, 1992; Ord. 334, 1973)

Ione General Plan

- **Policy CO-4.3:** Protect surface and ground water from major sources of pollution, including hazardous materials contamination and urban runoff.

- **Policy CO-4.4:** Minimize erosion into stream channels resulting from new development in urban areas, consistent with State law. (*Cross reference PF 3.1.4*)

Ione Municipal Code

Projects within the City of Ione must also comply with the following requirements of the City's Municipal Code:

- **Chapter 18.04 – Floodplain Management.** This section sets standards for development within special flood hazard zones and requires a floodplain development permit before any construction, or other development, commences within any area of special flood hazard established in Section 18.04.070. Additionally, areas within special flood hazard zones must be developed with base flood elevation (BFE) information, as specified in Section 18.04.070 or Subsection 18.04.150 C.

- **Chapter 18.16.180 – Stormwater Management.** This section requires the implementation of best management practices into the landscape and grading design plans to minimize runoff and to increase on-site retention and infiltration are encouraged. Rain gardens, cisterns, and other landscapes features and practices that increase rainwater capture and create opportunities for infiltration and/or on-site storage are recommended.

Ione's Improvement Standards

Chapter 11 of the City of Ione's Improvement Standards contains the Storm Drainage Design Standards. The standards serve as a guideline for drainage system design and indicate minimum design standards acceptable to the City. Improvement projects shall be protected from inundation, flood hazard, sheet overflow, and ponding of stormwater, springs, and other surface waters. The design of improvements shall be such that water accumulating within the project will be carried away from the project without injury to adjacent improvements, residential sites, or residences to be constructed on sites within the project, or to adjoining areas. Water accumulating within the project shall be carried to storm drainage facilities or to a natural water course by closed conduit or open channel and shall meet the design standards herein set forth.

Sutter Creek General Plan

- **Policy COS-1.5.2:** To the maximum extent feasible, plants native to the Sutter Creek area that do not require much irrigation should be used for landscaping.

Sutter Creek Municipal Code

Projects within the City of Sutter Creek must also comply with the following requirements of the City's Municipal Code:

- **14.04.230 - Storm or Drainage Water and the Introduction of Toxic and Other Harmful Wastes into the Sewer System—Prohibited.** This chapter prohibits the discharge of non-stormwater discharges to the City storm drain system.

5.9.1.2 EXISTING CONDITIONS

Regional and Local Drainage

Argonaut High School

The Argonaut HS project site is within the Middle Jackson Creek watershed (USEPA 2023a). The Middle Jackson Creek watershed extends from the City of Jackson to the east, just before the Pardee reservoir to the south, to the end of Lake Amador to the west and bounded by State Route 88 to the north.

The Argonaut HS project site is currently developed with hardscape and impervious surfaces encompassing the school buildings and parking lots; the pervious areas include landscaping and play fields. The topography of the project site slopes east to west. Currently, runoff is collected via storm drain inlets and conveyed by an internal storm drain system that connects to the City's existing storm drains.

As indicated in Section 5.3.1.2, in Chapter 5.3, *Biological Resources,* the National Waters Inventory identified a riverine habitat with intermittent/seasonal flows that runs through the Argonaut HS campus. However, this is a historic feature, and this area of the campus is completely developed with a baseball diamond, disturbed land/turf, and the stadium.

Ione Junior High School

The Ione Junior HS project site is within the Lower Sutter Creek watershed (USEPA 2023b). The Lower Sutter Creek watershed is a narrow straight and extends from where Grass Valley Creek joins Sutter Creek to the east, to the community of Sunnybrook to the south, just before Loch Lane Lake, and below Rancheria Creek to the north.

The Ione Junior HS project site is currently developed with hardscape and impervious surfaces encompassing the school buildings and parking lots; the pervious areas include landscaping and play fields. The topography of the project site is relatively flat. Currently, runoff is collected via a storm drain inlet (drop inlet and surface drain) and conveyed by an internal storm drain system that connects to the City's existing storm drains.

Sutter Creek Elementary School

The Sutter Creek ES project site is also within the Lower Sutter Creek watershed (EPA 2023b).

The Sutter Creek ES project site is currently developed with hardscape and impervious surfaces encompassing the school buildings and parking lots; the pervious areas include landscaping and play fields. The topography of the project site is relatively flat. Currently, runoff is collected to the undeveloped grassy/landscaped portions of the site where it gets absorbed into the soil or is directed to a corrugated metal pipe to the storm drains in the public right-of-way.

Surface Water Quality

Argonaut High School

Jackson Creek and Amador Lake are the main waterbodies in the Middle Jackson Creek watershed. Jackson Creek extends westerly through the southern portion of the watershed and unincorporated Amador County, past Lake Amador discharging to Dry Creek in the west (USEPA 2023a). Moore Ditch is located east of the Argonaut HS project site and is an unlined, permanently closed ditch running south past French Bar Road to Laughton Reservoir. The topography of the Argonaut HS project site slopes east to west. Currently, runoff is collected via storm drain inlets and conveyed by an internal storm drain system that connects to the City's existing storm drains.

Jackson Creek is not listed under Section 303(d), and there are no existing plans for restoration. However, Amador Lake is listed under Section 303(d) as of 2022 due to issues with mercury and other causes (USEPA 2023a). There are three permitted discharges within the Middle Jackson Creek watershed, including the Alpine Process Water Discharge, Jackson wastewater treatment plant, and the SPI Martell Landfill (USEPA 2023a). A violation of the CWA has been identified at the Jackson wastewater treatment plant. The date of last compliance was May 2, 2019.

Ione Junior High School and Sutter Creek Elementary School

Sutter Creek is the main waterbody in the Lower Sutter Creek watershed. Sutter Creek extends westerly through the central portion of the watershed and existing urbanized areas within the city, discharging to Dry Creek in the west. The Sutter Creek water body is in 'Good'[3] condition for aquatic life and swimming (USEPA 2023b).

The topography for Ione Junior HS and Sutter Creek ES project sites are relatively flat. For Ione Junior HS, runoff is collected via a storm drain inlet (drop inlet and surface drain) and conveyed by an internal storm drain system that connects to the City's existing storm drains. For Sutter Creek ES, runoff is collected to the undeveloped grassy/landscaped portions of the site where it gets absorbed into the soil or is directed to a corrugated metal pipe to the City's existing storm drains in the public right of way.

Sutter Creek is not listed under Section 303(d), and there are no plans for restoration. There are four permitted dischargers in the Lower Sutter Creek watershed, which include Ampine LLC, Jackson Westover Airport, Amador Transit Mix Inc., and Amador County Unified School District. These sites have a general permit for industrial stormwater, and no significant violation has occurred in the last three years (USEPA 2023a).

Groundwater and Groundwater Quality

Argonaut High School

According to the DWR Groundwater Basin Boundary Assessment tool, there are no large underground storage basins or large-scale development of groundwater resources in the City of Jackson (DWR 2019). AWA provides water services to the proposed project site. The AWA's existing water supply sources consist of primarily surface water (91 percent) and groundwater (9 percent) (AWA 2021). Groundwater is specifically used in the communities of La Mel Heights and Lake Camanche Village.

Ione Junior High School

According to the DWR Groundwater Basin Boundary Assessment tool, the City of Ione is part of Cosumnes Subbasin in the San Joaquin Valley groundwater basin, which is covered under the 2021 Groundwater Sustainability Plan (GSP) for the Cosumnes Subbasin (Basin) (DWR 2019, 2022). Seven Groundwater Sustainability Agencies (GSAs) manage the subbasin, and the Amador County Groundwater Management Authority (ACGMA) is the regional GSA. ACGMA GSA encompasses approximately 53,800 acres of western Amador County. ACGMA is responsible for pursuing the sustainability goal within the basin by monitoring and managing the basin's sustainable yield. AWA is the only permitted agency within the ACGMA area to use groundwater from the basin. AWA provides water services to the proposed project site.

Sutter Creek Elementary School

According to the DWR Groundwater Basin Boundary Assessment tool, there are no large underground storage basins or large-scale development of groundwater resources in the City of Sutter Creek (DWR 2019). AWA provides water services to the project site.

[3] Good waters are waterbodies fully supporting their designated uses under the Clean Water Act.

Flooding and Dam Inundation

Argonaut High School

As identified by FEMA flood map service, Argonaut HS is within flood zone X, an area of minimal flood hazard (FEMA 2023a). Flood zone X is above the 500-year flood level. Additionally, Argonaut HS is not within a dam inundation area and there are no nearby aboveground water storage tanks that could cause flooding in the unlikely event of a tank failure (DSOD 2023).

Ione Junior High School

As identified by the FEMA flood map service, Ione Junior HS is within the 100-year flood zone AE with BFE and flood zone X (0.2 percent Annual Chance Flood Hazard) (FEMA 2023b). The potential for flooding exists on the campus. Additionally, the Ione Junior HS is not within a dam inundation area and there are no nearby aboveground water storage tanks that could cause flooding in the unlikely event of a tank failure (DSOD 2023). See Figure 5.9-1, *Ione Junior High School Flood Zone*.

Sutter Creek Elementary School

As identified by the FEMA flood map service, Sutter Creek ES is not within an identified flood zone (FEMA 2023c). The Sutter Creek General Plan identifies the Tanner Reservoir, which is approximately 1.6 miles southwest of the school, as the only reservoir to potentially threaten lives or property. However, the dam is not considered a hazard and if rupture were to occur, the release would be slow and use the existing drainage course along Old Ridge Road (Sutter Creek 2019). The Sutter Creek ES is not within a dam inundation area and there are no nearby aboveground water storage tanks that could cause flooding in the unlikely event of a tank failure (DSOD 2023).

5.9.2 Thresholds of Significance

According to Appendix G of the California Environmental Quality Act (CEQA) Guidelines, a project would normally have a significant effect on the environment if the project would:

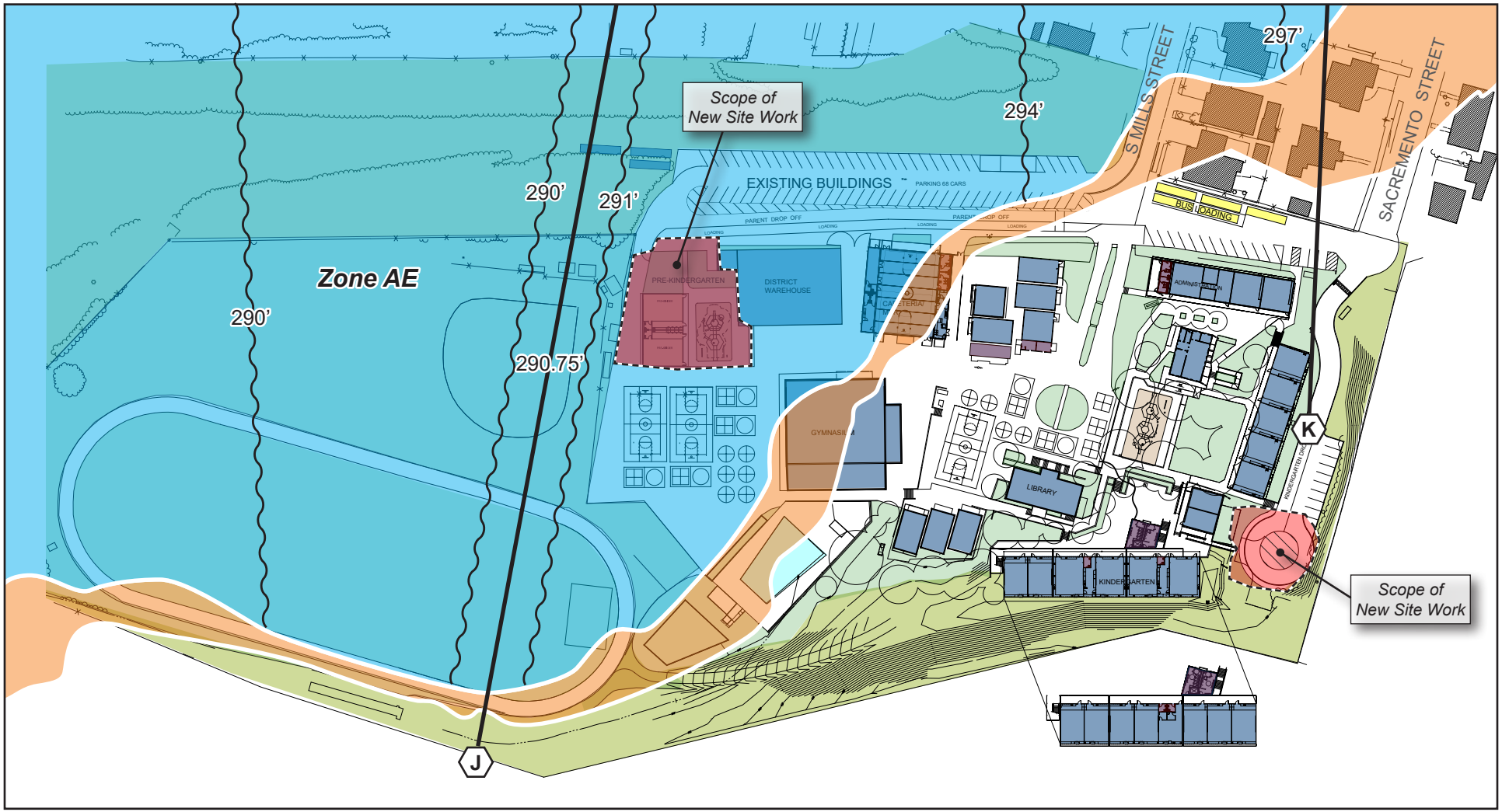
HYD-1 Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

HYD-2 Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

HYD-3 Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i) Result in a substantial erosion or siltation on- or off-site.
- ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.

Figure 5.9-1 - Ione Junior High School Flood Zone



Scope of New Site Work

Without Base Flood Elevation (BFE) *(Zone A, V, A99)*
With BFE or Depth *(Zone AE, AO, AH, VE, AR)*

0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with averrage depth less than one foot or with drainage areas of less than one square mile *(Zone X)*

J 290.75' Cross Sections with 1% Annual Chance

~290' Base Flood Elevation Line (BFE)

0 140
Scale (Feet)

Source: California Design West Architects 2023; FEMA 2023.

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

iv) Impede or redirect flood flows.

HYD-4 In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

HYD-5 Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

5.9.3 Environmental Impacts

5.9.3.1 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.9-1: Project implementation would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality. [Threshold HYD-1]

Clearing, grading, excavation, and construction activities associated with the proposed project may 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. Refueling and parking of construction vehicles and other equipment on-site during construction may also result in oil, grease, or related pollutant leaks and spills that may discharge into the storm drain system.

Additionally, urban runoff from storms or nuisance flows (runoff during dry periods) during the operational phase can carry pollutants to receiving waters. Runoff can contain pollutants such as oil, grease, fuel, antifreeze, byproducts of combustion (such as lead, cadmium, nickel, and other metals), fertilizers, herbicides, pesticides, trash, and sediment. This runoff can flow directly into local streams or into storm drains and continue through pipes until it is released untreated into a local waterway and eventually the ocean. Untreated stormwater runoff degrades water quality in surface waters and groundwater and can affect drinking water, human health, and plant and animal habitats.

The following is a discussion of the potential impacts that the construction and operational phases of the proposed project could have on water resources and quality.

Argonaut High School Site Improvements

Construction Phase

To minimize construction impacts at the Argonaut HS site, the proposed project would be required to comply with the NPDES and CGP and prepare a SWPPP that requires the incorporation of BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. The SWRCB

mandates that projects that disturb one or more acres of land must obtain coverage under the CGP. The CGP also requires that prior to the start of construction activities, the project applicant must file PRDs with the SWRCB, which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. The construction contractor is required to always maintain a copy of the SWPPP on-site and implement all construction BMPs identified in the SWPPP during construction activities. Prior to the issuance of a grading permit, ACUSD is required to provide proof of filing of the PRDs with the SWRCB, which includes preparation of SWPPP.

The SWPPP must describe construction BMPs that address pollutant source reduction and provide measures/controls to mitigate potential pollutant sources. These include, but are not limited to, erosion controls, sediment controls, tracking controls, non-stormwater management, materials and waste management, and good housekeeping practices. Submittal of the PRDs, implementation of the SWPPP and its associated BMPs, and adherence with water quality standards and waste discharge requirements throughout the construction phase would result in a less-than-significant impact.

Operational Phase

The District is not regulated under the Central Valley Region MS4 permit, and the Phase II Small MS4 permit for K-12 school districts and community colleges has not yet been issued by the SWRCB. In the interim, the District is required to comply with the post-construction performance standards under the CGP. The performance standards specify runoff reduction requirements for all sites not covered by Phase I or Phase II MS4 permits to minimize and mitigate stormwater runoff impacts. The proposed project would implement site design and source-control BMPs to control the amount and quality of the stormwater leaving the project site.

Site design BMPs would be incorporated into the proposed project's design to reduce the potential impacts on surface and groundwater quality. These include the incorporation of earthen swales, planters, native plants, and drought-tolerant plants in landscaping and effective irrigation systems. Source-control BMPs effectively minimize the potential for typical urban pollutants to contact stormwater, thereby limiting water quality impacts downstream. Source-control BMPs would include educational materials; inspection and maintenance of site BMPs (catch basins, grate inlets, etc.); compliance with Uniform Fire Code; providing storm drain stenciling or signage on all storm drain inlets and catch basins; and designing and regularly inspecting all trash storage areas. As discussed in Section 5.8.3, Impact 5.8.1, in Chapter 5.8, *Hazards and Hazardous Materials,* compliance with applicable federal and State laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure impacts would be less than significant. Furthermore, the District would adhere to the requirements of the City of Jackson Municipal Code, specifically Section 17.30.050 (Drainage and Storm Water Runoff), which requires drainage and erosion plans to reduce impacts associated with runoff, and Section 17.40.040.15 (Stormwater Management and Rainwater Retention), which requires the inclusion of BMPs into landscape and grading design plans to minimize runoff. With the implementation of the BMP features described, as well as compliance with State, County, and local regulations and code requirements, the proposed project would have a **less-than-significant impact** on surface or groundwater quality during the operational phase.

Ione Junior High School Site Improvements

Construction Phase

To minimize these potential impacts at the Ione Junior HS site, the proposed project would be required to comply with the NPDES and CGP as well as prepare a SWPPP that requires the incorporation of BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. The SWRCB mandates that projects that disturb one or more acres of land must obtain coverage under the CGP. The CGP also requires that prior to the start of construction activities, the project applicant must file PRDs with the SWRCB, which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. The construction contractor is required to always maintain a copy of the SWPPP on-site and implement all construction BMPs identified in the SWPPP during construction activities. Prior to the issuance of a grading permit, the District is required to provide proof of filing of the PRDs with the SWRCB, which includes preparation of a SWPPP.

The SWPPP must describe construction BMPs that address pollutant source reduction and provide measures/controls to mitigate potential pollutant sources. These include, but are not limited to, erosion controls, sediment controls, tracking controls, non-stormwater management, materials and waste management, and good housekeeping practices. Submittal of the PRDs, implementation of the SWPPP and its associated BMPs, and adherence with water quality standards and waste discharge requirements throughout the construction phase would result in a **less-than-significant impact**.

Operational Phase

The District is not regulated under the Central Valley Region MS4 permit, and the Phase II Small MS4 permit for K-12 school districts and community colleges has not yet been issued by the SWRCB. In the interim, the District is required to comply with the post-construction performance standards under the CGP. The performance standards specify runoff reduction requirements for all sites not covered by Phase I or Phase II MS4 permits to minimize and mitigate stormwater runoff impacts. The proposed project would implement site design and source-control BMPs to control the amount and quality of the stormwater leaving the project site.

Site design BMPs would be incorporated into the proposed project's design to reduce the potential impacts on surface and groundwater quality. These include the incorporation of earthen swales, planters, native plants, and drought-tolerant plants in landscaping and effective irrigation systems. Source-control BMPs effectively minimize the potential for typical urban pollutants to contact stormwater, thereby limiting water quality impacts downstream. Source-control BMPs would include educational materials; inspection and maintenance of site BMPs (catch basins, grate inlets, etc.); compliance with Uniform Fire Code; providing storm drain stenciling or signage on all storm drain inlets and catch basins; and designing and regularly inspecting all trash storage areas. As discussed in Section 5.8.3, Impact 5.8.1, in Chapter 5.8, *Hazards and Hazardous Materials,* compliance with applicable federal and State laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure impacts would be less than significant. Furthermore, the District would adhere to the requirements of the City of Ione Municipal Code, specifically Section 18.16.180 (Stormwater management), which requires implementation of BMPs into landscape and grading design plans to minimize

runoff and encourage infiltration (i.e., rain gardens, cisterns, and other landscape features and practices that increase rainwater capture and infiltration). With the implementation of the BMP features described, as well as compliance with State, County, and local regulations and code requirements, the proposed project would have a **less-than-significant impact** on surface or groundwater quality during the operational phase.

Sutter Creek Elementary School Site Improvements

Construction Phase

To minimize these potential impacts, the proposed project would be required to comply with the NPDES and CGP, as well as prepare a SWPPP that requires the incorporation of BMPs to control sedimentation, erosion, and hazardous materials contamination of runoff during construction. The SWRCB mandates that projects that disturb one or more acres of land must obtain coverage under the CGP. The CGP also requires that prior to the start of construction activities, the project applicant must file PRDs with the SWRCB, which includes a Notice of Intent, risk assessment, site map, annual fee, signed certification statement, SWPPP, and post-construction water balance calculations. The construction contractor is required to always maintain a copy of the SWPPP on site and implement all construction BMPs identified in the SWPPP during construction activities. Prior to the issuance of a grading permit, the District is required to provide proof of filing of the PRDs with the SWRCB, which includes preparation of a SWPPP.

The SWPPP must describe construction BMPs that address pollutant source reduction and provide measures/controls to mitigate potential pollutant sources. These include, but are not limited to, erosion controls, sediment controls, tracking controls, non-stormwater management, materials and waste management, and good housekeeping practices. Submittal of the PRDs, implementation of the SWPPP and its associated BMPs, and adherence with water quality standards and waste discharge requirements throughout the construction phase would result in a **less-than-significant impact**.

Operational Phase

The District is not regulated under the Central Valley Region MS4 permit, and the Phase II Small MS4 permit for K-12 school districts and community colleges has not yet been issued by the SWRCB. In the interim, the District is required to comply with the post-construction performance standards under the CGP. The performance standards specify runoff-reduction requirements for all sites not covered by Phase I or Phase II MS4 permits to minimize and mitigate stormwater runoff impacts. The proposed project would implement site design and source-control BMPs to control the amount and quality of the stormwater leaving the project site.

Site design BMPs would be incorporated into the proposed project's design to reduce the potential impacts on surface and groundwater quality. These include the incorporation of earthen swales, planters, native plants, and drought-tolerant plants in landscaping and effective irrigation systems. Source-control BMPs effectively minimize the potential for typical urban pollutants to contact stormwater, thereby limiting water quality impacts downstream. Source-control BMPs would include educational materials; inspection and maintenance of site BMPs (catch basins, grate inlets, etc.); compliance with the Uniform Fire Code; providing storm drain stenciling or signage on all storm drain inlets and catch basins; and designing and regularly inspecting all trash storage

areas. As discussed in Section 5.8.3, Impact 5.8.1, in Chapter 5.8, *Hazards and Hazardous Materials,* compliance with applicable federal and State laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure impacts would be less than significant. Furthermore, the District would adhere to the requirements of the City of Sutter Creek Municipal Code, specifically Section 14.04.230 (Storm or Drainage Water and the Introduction of Toxic and Other Harmful Wastes into the Sewer System—Prohibited), which prohibits the discharge of non-stormwater discharges to the City's drain system. With the implementation of the BMP features described, as well as compliance with State, County, and local regulations and code requirements, the proposed project would have a **less-than-significant impact** on surface or groundwater quality during the operational phase.

Level of Significance Before Mitigation: Less than Significant.

Impact 5.9-2: Project implementation would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin. [Threshold HYD-2]

The AWA primarily provides surface water (91 percent) to the campuses (AWA 2021). AWA does not import water, and groundwater (9 percent) supplies are used for the communities of La Mel Heights and Lake Camanche Village. The proposed project would increase student capacity and staffing at the Argonaut, Ione Junior, and Sutter Creek campuses, while consolidating other school campuses. The AWA does not use groundwater to service the City of Jackson, Ione, or Sutter Creek, nor the campuses; therefore, overall groundwater demand is not expected to substantially increase.

Argonaut High School Site Improvements

As previously stated in Section 5.9.1.2, *Existing Conditions*, there are no large underground storage basins or large-scale development of groundwater resources in the City of Jackson (DWR 2019).

The project site is already built out with the existing Argonaut HS, which includes hardscape and impervious surfaces (i.e., classroom buildings), and implementation of the proposed project would not substantially increase the impervious surfaces on campus. Runoff from the project site would go directly into the ground or to the existing storm drains. Additionally, it is unlikely that groundwater would be encountered during construction that would require dewatering, as construction would not require earthwork at subterranean depths. The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin, and impacts would be **less than significant**.

Ione Junior High School Site Improvements

As previously stated in Section 5.9.1.2*, Existing Conditions*, the City of Ione is part of the Cosumnes Subbasin in the San Joaquin Valley groundwater basin (DWR 2019, 2022). The GSP for the Cosumnes Subbasin is implemented by the ACGMA within Amador County (CGA 2021). ACGMA is responsible for pursuing the sustainability goal within the basin, which includes the long-term beneficial use of groundwater within the basin by monitoring and managing the basin's sustainable yield. This basin has been characterized by DWR as a

medium-priority subbasin. The groundwater basin is not adjudicated. AWA is the only permitted agency within the ACGMA area to use groundwater from the basin. No impact on groundwater supplies would occur as AWA does not use groundwater to service the campus.

The project site is already built out with the existing Ione Junior HS, which includes hardscape and impervious surfaces (i.e., classroom buildings). As such, implementation of the proposed project would not substantially increase the impervious surfaces on campus, and therefore, would not impact groundwater recharge nor impede sustainable groundwater management of the basin the San Joaquin Valley basin. Runoff from the project site would go directly into the ground or to the existing storm drains. Additionally, it is unlikely that groundwater would be encountered during construction that would require dewatering, as construction would not require earthwork at subterranean depths. The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin, and impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

As previously stated in Section 5.9.1.2*, Existing Conditions*, there are no large underground storage basins or large-scale development of groundwater resources in the City of Sutter Creek (DWR 2019).

The project site is already built out with the existing Sutter Creek ES, which includes hardscape and impervious surfaces (i.e., classroom buildings), and implementation of the proposed project would not substantially increase the impervious surfaces on campus. Runoff from the project site would go directly into the ground or to the existing storm drains. Additionally, it is unlikely that groundwater would be encountered during construction that would require dewatering, as construction would not require earthwork at subterranean depths. The proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin, and impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than Significant.

Impact 5.9-3: The proposed project would not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- **i) Result in a substantial erosion or siltation on- or off-site.**
- **ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site.**
- **iii) Create or contribute runoff water that would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff.**
- **iv) Impede or redirect flood flows. [Threshold HYD-3]**

Argonaut High School Site Improvements

Erosion and Siltation

Erosion and siltation impacts that could result from the alteration of drainage patterns would, for the most part, occur during the proposed project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topography, soil type, wind, and rainfall. Siltation is associated with sediment transport and deposition in waterways. The proposed project would not involve the alteration of any natural drainage channels or any watercourse. As mentioned above, the National Waters Inventory identified a riverine habitat with intermittent/seasonal flows that runs through the Argonaut HS campus. However, this area of the campus is completely developed with a baseball diamond, disturbed land/turf, and the stadium. The proposed project would continue to operate the campus as a high school and use these areas consistent with existing conditions.

The proposed project's construction includes grading, utilities trenching, asphalt demolition, and building construction. If not controlled, the transport of these materials to local waterways would temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. As discussed in Impact 5.9-1, the proposed project would be required to comply with water quality standards, waste discharge requirements, City of Jackson municipal code (Section 17.40.040.7 Grading Design Plan and Section 17.40.050.15 Stormwater Management and Rainwater Retention), PRDs, and submit a SWPPP to the SWRCB for approval prior to the commencement of construction activities. The SWPPP would specify BMPs for reducing or eliminating soil erosion from the site during project construction and operation. Erosion-control measures implemented as part of BMPs may include the placement of sandbags around basins; use of proper grading techniques; appropriate sloping, shoring, and bracing of the construction site; using mulch, geotextiles, hydroseeding, swales, and earth dikes; and covering topsoil stockpiles. Implementation of SWPPP BMPs would ensure the proposed project does not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site. Impacts would be **less than significant**.

On and Off-Site Flooding and Capacity of the Storm Drain System

The project site is already built out with the existing Argonaut HS, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping, track and field, baseball, and softball fields). The proposed improvements at the campus would increase impervious surfaces, compared to existing conditions, which could contribute runoff that could exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts would be **potentially significant**.

Flood Flows

As identified by the FEMA flood map service, Argonaut HS is within flood Zone X, an area of minimal flood hazard (FEMA 2023a). Zone X is an area of minimal flood hazard and is depicted on FIRMs as above the 500-year flood level. Additionally, Argonaut HS is not within a dam inundation area, and there are no nearby aboveground water storage tanks that could cause flooding in the unlikely event of a tank failure (DSOD 2023).

The project site is not within a flood hazard area, and implementation of the proposed project would not place new structures within a flood hazard area or redirect flood flows; thus, **no impact** would occur.

Ione Junior High School Site Improvements

Erosion and Siltation

Erosion and siltation impacts that could result from the alteration of drainage patterns would, for the most part, occur during the proposed project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topography, soil type, wind, and rainfall. Siltation is associated with sediment transport and deposition in waterways. The proposed project would not involve the alteration of any natural drainage channels or any watercourse.

The proposed project's construction activities include grading, utilities trenching, asphalt demolition, and building construction. If not controlled, the transport of these materials to local waterways would temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. As discussed in Impact 5.9-1, the proposed project would be required to comply with water quality standards, waste discharge requirements, City of Ione Municipal Code (Section 18.16.180 Stormwater Management), PRDs, and submit a SWPPP to the SWRCB for approval prior to the commencement of construction activities. The SWPPP would specify BMPs for reducing or eliminating soil erosion from the site during project construction and operation. Erosion-control measures implemented as part of BMPs may include the placement of sandbags around basins; use of proper grading techniques; appropriate sloping, shoring, and bracing of the construction site; using mulch, geotextiles, hydroseeding, swales, and earth dikes; and covering topsoil stockpiles. Implementation of SWPPP BMPs would ensure the proposed project does not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site. Impacts would be **less than significant.**

On and Off-Site Floding and Capacity of the Storm Drain System

The project site is already built out with the existing Ione Junior HS, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping, track and field, and a baseball field). The proposed project would occur in existing facilities and areas that currently contain hardscape, storage containers, and vegetation (trees and grasses); the increases in impervious surfaces would be minimal. Nonetheless, the proposed improvements at the campus would increase impervious surfaces, compared to existing conditions, which could contribute runoff that could exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts would be **potentially significant**.

Flood Flows

As identified by the FEMA flood map service, Ione Junior HS is within the 100-year flood zone AE with a BFE and Flood Zone X (0.2 percent Annual Chance Flood Hazard), as shown in Figure 5.9-1, *Ione Junior High School Flood Zone*. The project has been designed in accordance with FEMA and City requirements to minimize the potential for on-site and off-site flooding. The City of Ione's Municipal Code Chapter 18.04, Floodplain Management, requires a floodplain development permit before construction begins in a 100-year floodplain.

The proposed development's floodplain development permit must be certified by a registered civil engineer or architect and approved by the Floodplain Administrator at the City of Ione. Section 18.04.130 of the Ione Municipal Code sets forth standards for any development within a flood hazard zone that would minimize flood hazard risks, including anchoring, construction materials and methods, elevation, and flood-proofing. These measures would minimize the potential for flooding and thus reduce impacts associated with impeding or redirecting flood flows to less than significant. Additionally, Ione Junior HS is not within a dam inundation area and there are no nearby aboveground water storage tanks that could cause flooding in the unlikely event of a tank failure (DSOD 2023). Therefore, impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

Erosion and Siltation

Erosion and siltation impacts that could result from the alteration of drainage patterns would, for the most part, occur during the proposed project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topography, soil type, wind, and rainfall. Siltation is associated with sediment transport and deposition in waterways. The proposed project would not involve the alteration of any natural drainage channels or any watercourse.

The proposed project's construction includes grading, utilities trenching, asphalt demolition, and building construction. If not controlled, the transport of these materials to local waterways would temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. As discussed in Impact 5.9-1, the proposed project would be required to comply with water quality standards, waste discharge requirements, PRDs, and submit a SWPPP to the SWRCB for approval prior to the commencement of construction activities. The SWPPP would specify BMPs for reducing or eliminating soil erosion from the site during project construction and operation. Erosion-control measures implemented as part of BMPs may include the placement of sandbags around basins; use of proper grading techniques; appropriate sloping, shoring, and bracing of the construction site; using mulch, geotextiles, hydroseeding, swales, and earth dikes; and covering topsoil stockpiles. Implementation of SWPPP BMPs would ensure the proposed project does not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site. Impacts would be **less than significant**.

On and Off-site Floding and Capacity of the Storm Drain System

The project site is already built out with the existing Sutter Creek ES, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping and play structures on uncovered soil). The proposed improvements would occur in an area that currently contains hardscape; thus, no additional impervious surfaces would occur. Therefore, the proposed project would not contribute runoff that could exceed the capacity of existing or planned stormwater drainage systems. Therefore, impacts would be **less than significant**.

Flood Flows

As identified by the FEMA flood map service, Sutter Creek ES is not within an identified flood zone (FEMA 2023c). Additionally, the Sutter Creek ES is not within a dam inundation area and there are no nearby aboveground water storage tanks that could cause flooding in the unlikely event of a tank failure (DSOD 2023). The proposed project site is not within a flood hazard area, and implementation of the proposed project would not place new structures within a flood hazard area or redirect flood flows; thus, **no impact** would occur.

Level of Significance Before Mitigation: Potentially Significant.

Impact 5.9-4: Project implementation would not risk the release of pollutants due to project inundation. [Threshold HYD-4]

Argonaut High School Site Improvements

The proposed project sites are not in a dam inundation area and there are no nearby aboveground water storage tanks that could cause flooding in the unlikely event of a tank failure (DSOD 2023).

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. There are no inland bodies of water in the vicinity of the proposed project sites that could pose a seiche hazard to the site.

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The proposed project sites are all over 95 miles inland from the Pacific Ocean and are outside of the tsunami inundation area mapped by the California Department of Conservation (CDC 2022).

According to FEMA, the proposed project sites are not within a 100-year flood hazard area (FEMA 2023a).

N**o impact** would occur due to project inundation in flood hazard, tsunami, or seiche zones.

Ione Junior High School Site Improvements

The proposed project sites are not in a dam inundation area and there are no nearby aboveground water storage tanks that could cause flooding in the unlikely event of a tank failure (DSOD 2023).

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. There are no inland bodies of water in the vicinity of the proposed project sites that could pose a seiche hazard to the site.

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The proposed project sites are all over 95 miles inland from the Pacific Ocean and are outside of the tsunami inundation area mapped by the California Department of Conservation (CDC 2022).

According to FEMA, the project site is within FEMA flood zone AE and is subject to inundation by the 100-year flood with a BFE (FEMA 2023a). (See Figure 5.9-1, *Ione Junior High School Flood Zone)* Therefore, the project could potentially release pollutants due to flood hazards.

As part of the site design, the finished floor elevation of the buildings would be required to adhere to FEMA and local regulations, and the City of Ione's Municipal Code Chapter 18.04, Floodplain Management. Section 18.04.130 of the Ione Municipal Code requires a floodplain development permit before construction begins in a 100-year floodplain. The proposed development within the 100-year floodplain zone structure must be certified by a registered civil engineer or architect and approved by the Floodplain Administrator of the City of Ione. Section 18.04.130 of the Ione Municipal Code sets forth standards for any development within a flood hazard zone that would minimize flood hazard risks, including anchoring, construction materials and methods, elevation, and flood-proofing. These measures would minimize the potential for flooding and thus the risk of pollutant release. With adherence to FEMA and local regulations, impacts would be reduced to **less than significant**.

Sutter Creek Elementary School Site Improvements

The proposed project sites are not in a dam inundation area and there are no nearby aboveground water storage tanks that could cause flooding in the unlikely event of a tank failure (DSOD 2023).

A seiche is a surface wave created when an inland water body is shaken, usually by an earthquake. There are no inland bodies of water in the vicinity of the proposed project sites that could pose a seiche hazard to the site. As mentioned above, the Tanner Reservoir is not considered to be a threat to Sutter Creek ES because if a rupture were to occur, the release would be slow and use the existing drainage course along Old Ridge Road.

A tsunami is a series of ocean waves caused by a sudden displacement of the ocean floor, most often due to earthquakes. The proposed project sites are all over 95 miles inland from the Pacific Ocean and are outside of the tsunami inundation area mapped by the California Department of Conservation (CDC 2022).

According to FEMA, the proposed project sites are not within a 100-year flood hazard area (FEMA 2023c).

N**o impact** would occur due to project inundation in flood hazard, tsunami, or seiche zones. With compliance with local and FEMA regulations, impacts related to the release of pollutants due to flooding would be **less than significant** for the proposed project.

Level of Significance Before Mitigation: Less than significant.

Impact 5.9-5: Project implementation would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. [Threshold HYD-5]

Argonaut High School Site Improvements

According to the DWR Groundwater Basin Boundary Assessment tool, there are no large underground storage basins or large-scale development of groundwater resources in the City of Jackson (DWR 2019). Therefore, development on the site would have no impact related to obstructing the implementation of a sustainable groundwater management plan.

The Central Valley RWQCB monitors surface water quality and groundwater through the implementation of the Water Quality Control Plan for the Sacramento and San Joaquin River Basins. Implementation of the SWPPP; and adherence to the City's BMPs and municipal code requirements, the NPDES, and CGP, as described in Impact 5.9-1, would ensure that surface and groundwater quality are not adversely affected during construction. In addition, the implementation of BMPs at the site would ensure that water quality is not impacted during the operational phase of the project. Therefore, the proposed project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan and would result in a **less-than-significant impact**.

Ione Junior High School Site Improvements

According to the DWR Groundwater Basin Boundary Assessment tool, the City of Ione is part of the San Joaquin Valley groundwater basin – Cosumnes subbasin, which is covered under the 2021 GSP for the Cosumnes Subbasin (DWR 2019, 2022). This basin has been characterized by DWR as a medium-priority subbasin (CGA 2021). The groundwater basin is not adjudicated. The AWA, which has the authority to provide water services within Amador County and is allowed to pump water from the Cosumnes subbasin, primarily uses surface water (91 percent) to service residences in the county. Groundwater is used for the communities of La Mel Heights and Lake Camanche Village. The GSP provides management criteria to ensure that the sustainable yield of the groundwater basin is not exceeded. Although the proposed project site is anticipated to increase student capacity, the AWA does not use groundwater to service the City of Ione; therefore, no additional groundwater will be necessary for this proposed project, and the proposed project would not interfere with the implementation of the GSP.

The Central Valley RWQCB monitors surface water quality and groundwater through the implementation of the Water Quality Control Plan for the Sacramento and San Joaquin River Basins. Implementation of the SWPPP; and adherence to the City's BMPs and municipal code requirements, the NPDES, and CGP, as described in Impact 5.9-1, would ensure that surface and groundwater quality are not adversely affected during construction. In addition, the implementation of BMPs at the site would ensure that water quality is not impacted during the operational phase of the project. Therefore, the proposed project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan and would result in a **less-than-significant impact**.

Sutter Creek Elementary School Site Improvements

According to the DWR Groundwater Basin Boundary Assessment tool, there are no large underground storage basins or large-scale development of groundwater resources in the City of Jackson (DWR 2019). Therefore, development on the site would have no impact related to obstructing the implementation of a sustainable groundwater management plan.

The Central Valley RWQCB monitors surface water quality and groundwater through the implementation of the Water Quality Control Plan for the Sacramento and San Joaquin River Basins. Implementation of the SWPPP, and adherence to the City's BMPs and municipal code requirements, NPDES, and CGP, as described in Impact 5.9-1, would ensure that surface and groundwater quality are not adversely affected during construction. In addition, the implementation of BMPs at the site would ensure that water quality is not

impacted during the operational phase of the project. Therefore, the proposed project would not conflict with or obstruct the implementation of a water quality control plan or sustainable groundwater management plan and would result in a **less-than-significant impact.**

Level of Significance Before Mitigation: Less than significant.

5.9.4 Mitigation Measures

Impact 5.9-3

See Mitigation Measure USS-2 in Chapter 5.17, *Utilities and Service Systems*.

5.9.5 Level of Significance After Mitigation

Impact 5.9-3

Mitigation Measure USS-2 requires the preparation of infrastructure studies for Argonaut HS and Ione Junior HS that would assess and mitigate any storm drain capacity issues. Therefore, impacts would be less than significant with mitigation incorporated.

5.9.6 Cumulative Impacts

Hydrology and Drainage

Cumulative projects within Middle Jackson Creek watershed and Lower Sutter Creek watershed could increase impervious areas and increase stormwater runoff rates. The District and other K-12 school districts and community colleges are not currently subject to the requirements of the MS4 Permit. However, all other projects would be required to prepare and implement a Water Quality Management Plan (WQMP) that includes provisions for the capture and infiltration of runoff or the temporary detention of stormwater runoff in accordance with the NPDES MS4 permit. These BMPs include site design, source control, and treatment control measures that provide both flow control and treatment to runoff before it enters the storm drain system or is discharged into a receiving water body. Any new development would also be subject, on a project-by-project basis, to the applicable level of independent CEQA review as well as City or County design guidelines and other applicable policies and procedures. Thus, no significant cumulative drainage impacts would occur, and cumulative project drainage impacts would be **less than significant**.

Water Quality

Cumulative projects have the potential to generate pollutants during project construction and operation. Cumulative projects would prepare and implement WQMPs specifying BMPs that would minimize runoff from those sites and reduce contamination of runoff with pollutants. Other projects disturbing one or more acres of soil would also prepare and implement SWPPPs identifying BMPs for the construction phases of those projects to minimize runoff, erosion, and stormwater pollution. Thus, other projects, when combined with the project and existing development, are not expected to cause substantial increases in stormwater pollution.

5. Environmental Analysis
HYDROLOGY AND WATER QUALITY

Cumulative impacts would be **less than significant**, and project impacts would not be cumulatively considerable.

5.9.7 References

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5.10 LAND USE AND PLANNING

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential impacts to land use in the City of Sutter Creek, the City of Jackson, and the City of Ione from implementation of the proposed School Closure/Consolidation Program Project.

Land use impacts can be either direct or indirect. Direct impacts are those that result in land use incompatibilities, division of neighborhoods or communities, or interference with other land use plans, including habitat or wildlife conservation plans. This section focuses on direct land use impacts. Indirect impacts are secondary effects resulting from land use policy implementation, such as an increase in demand for public utilities or services, or increased traffic on roadways. Indirect impacts are addressed in other sections of this DEIR.

5.10.1 Environmental Setting

5.10.1.1 REGULATORY BACKGROUND

State and local laws, regulations, plans, or guidelines related to land use and planning and potentially applicable to the proposed project are summarized below.

State

California Code of Regulations

California Code of Regulations, Title 5, Education, provides information from the California Department of Education on minimum standards for educational facilities, procedures for site acquisition for public school districts, and the standards, planning, and approval of school facilities.

Local

Amador Local Agency Formation Commission

The Amador Local Agency Formation Commission implements the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 with an understandable and open public process leading to informed decisions. It coordinates logical and timely changes in local governmental boundaries (Section 56001); conducts special studies that review ways to reorganize, simplify, and streamline governmental structures (Section 56031); and prepares spheres of influence for each city and special district in the county (Section 56425). The Commission promotes efficient and economical services and encourages protection of agricultural and open space lands (Sections 56001, 56300). Further efforts include discouraging urban sprawl and encouraging orderly formation and development of local agencies based on local conditions and circumstances (Section 56301) (Amador County 2018).

Amador County General Plan

Amador County's General Plan was adopted on October 4, 2016. The Land Use Element describes the county's vision for future land uses and identifies how the physical environment will be shaped. It defines the location, type, and intensity of land uses. The goals, policies, and implementation programs of this element make up the County's land use strategy through 2030. The Public Services (PS) land use designation describes public, quasi-public, or public utility sites used for public services such as schools, public buildings, corporation yards, public airports, fairgrounds, water and sewer plants, cemeteries, and power substations, etc. Large acreages in highway rights-of-way may be included (Amador County 2016).

Amador County Code

The Amador County Code (ACC) consists of all the regulatory and penal ordinances and certain administrative ordinances of Amador County. Those that relate most closely to land use and planning are from Title 17, Divisions of Land, and Title 19, Zoning.

- Title 17, Divisions of Land. This title regulates new concepts and innovations of building sites. It provides minimum improvement requirements and the process for dividing land and using parcel maps.
- Title 19, Zoning. This title provides the zoning code. It assists in providing a definite plan of development that will guide, control, and regulate the future growth of the county. It protects the character of the county and promotes public safety.

City of Sutter Creek General Plan

The Sutter Creek General Plan was adopted in July of 2019. The Land Use Element shows the city's general distribution of land uses. The Public Service (PS) land use designation applies to land with a public or quasi-public use (Sutter Creek 2019).

- **Goal LU-1:** Allow the City to grow and prosper while protecting existing neighborhoods and the existing quality of life that is the essence of Sutter Creek. The existing quality of life includes the City's rural small town atmosphere, its historic qualities, and its current level of public services and facilities. The scenic and natural beauty of the existing skyline, prominent hillsides, and riparian corridors in the City and surrounding planning area as well as other topographically sensitive features shall be protected by requiring the use of creative land development designs that transfer density and construction to less sensitive areas.

City of Jackson General Plan

The Jackson General Plan Land Use Element was updated in November 2008. It is used as the blueprint for planning development in Jackson through 2028. The Public (P) designation applies to lands with public or quasi-public uses such as schools, hospitals, churches, and County offices (Jackson 2008).

- **Goal 1:** Growth in the City of Jackson shall occur only if new development adequately mitigates its environmental impacts, addresses housing availability and affordability needs, respects open space

resources and occurs so that the growth is in a manner which is not detrimental to the City's neighborhoods and small town quality of life.

- **Policy 1.8:** A balanced mix of housing, workplaces, shopping, recreational opportunities, and institutional uses, including mixed-use structures (combined residential and non-residential uses), that help to reduce vehicular trips shall be encouraged.

- **Policy 4.2:** To increase pedestrian access, development standards shall be created which require the installation of sidewalks for new development.

Currently, the City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals, policies, and actions related to land use are outlined here (Jackson 2023).

- **Goal LU-1:** Maintain a well-balanced land use mix that offers a variety of housing options, job opportunities, and commercial and community services while respecting the City's open space resources, neighborhoods, historic preservation, and small-town quality of life.

- **Policy LU 1.1:** Ensure consistency between the Land Use Map and implementing plans, ordinances, and regulations.

- **Policy LU 1.2:** Encourage a well-balanced mix of housing, workplaces, shopping, recreational opportunities, and institutional uses, including mixed-use structures (combined residential and non-residential uses), that help to reduce vehicular trips.

- **Policy LU 1.3:** Encourage infill development and logical development patterns. The City should discourage leap-frog development and undue conversion of open space and agricultural lands. Jackson should encourage greater density of new development in the center core areas of the City and lesser density in the peripheral areas.

- **Goal LU-2:** Manage and direct growth so that the community's natural and historical features and neighborhoods are protected and enhanced by compatible development.

- **Policy LU 2.2:** Promote high-quality design and site planning that is compatible with surrounding development, public spaces, and natural and historical resources.

- **Policy LU 2.3:** Require that development is located and designed to ensure compatibility among land uses, addressing such elements as building orientation and setbacks; buffering; visibility and privacy; automobile and truck access; impacts of noise, lighting, and glare; landscape quality; and aesthetics.

- **Policy LU 2.10:** Locate residences away from areas of excessive noise, smoke, dust, odor, and lighting, and ensure that adequate provisions, including buffers or transitional uses, are implemented to ensure the health and wellbeing of existing and future residents.

- **Goal LU-3:** Provide a range of housing options that meet the needs of all segments of the community.

- **Policy LU 3.2:** Encourage residential development to occur in a balanced and efficient pattern that reduces sprawl, preserves open space, and creates convenient connections to other land uses.
- **Policy LU 3.3:** Encourage creativity in the design and construction of residential projects in order to increase affordable housing options throughout the City. Projects that incorporate unique site design, clustered developments, and other tools to increase housing options shall be encouraged.
- **Policy LU 3.4:** Encourage growth to contribute to the City's strong, diversified economic base and provide an appropriate balance between employment and housing opportunities for all income levels.
- **Policy LU 4.1**: Ensure that an adequate inventory of industrial, commercial, and office land is designated, zoned, and maintained to support local shopping, employment, and service needs.
- **Policy LU 4.3:** Promote attractive commercial uses that are functional, well-maintained, and of high-quality design. As feasible, support and encourage property maintenance and the revitalization of economically disadvantaged and poorly maintained commercial sites.
- **Policy LU 4.6:** Promote and encourage development projects, design improvements, and capital improvements that celebrate and compliment Jackson's history and local natural and economic resources.
- **Policy LU 5-3:** Encourage projects that offer pedestrian scaled designs and walkability to reduce vehicle trips and parking demand within the downtown area.
- **Goal LU-6:** Maintain existing service levels, facilities, and infrastructure, and provide for expansion, extension, or upgrades to meet the needs of new development without adversely impacting existing levels of service or the revenues required to provide them.
- **Policy LU 6-2:** Require development, infrastructure, and long-term planning projects to be consistent with all applicable infrastructure plans, including the Amador Water Agency Urban Water Management Plan and the City's capital improvement programs.
- **Goal LU-7:** Create an environmentally just City with an equitable distribution of public facilities and services, and a safe and healthy environment including access to healthy foods, recreation and activity, public services, and opportunities for public input for all community members.
- **Policy LU 7.8:** Ensure the City provides equitable public improvements and community amenities to all areas of the City.
- **Policy LU 7.10:** Encourage and prioritize projects that address the social and economic needs of economically vulnerable populations.

City of Ione General Plan

The Ione General Plan Land Use Element was updated in August 2009. It ensures land is properly allocated for the purpose of urban revitalization, commercial facilities, agriculture, and schools. It describes Ione's eight land use principles: balanced land uses, transportation choices, housing choices, thriving downtown, walkable community, preservation/integration of natural resources, preserving sense of place/quality design, and regeneration/infill (Ione 2009).

- **Goal LU-1:** Establish growth patterns that enhance the quality of life in Ione and contribute to a balanced community.
- **Policy LU-1.1:** Ensure future land use and growth within the Planning Area adheres to the City's Land Use Principles, as described in this Element.
- **Policy LU-1.2:** Use Master Plans, Specific Plans, and development projects to promote pedestrian and bicycle movement via direct, safe, and pleasant routes that connect destinations inside and outside the plan or project area. (*Cross reference: CIR 2.2, CIR 2.3, CIR 2.4, CIR 2.5, CIR 2.6, CIR 2.7, CIR 2.8*)
- **Policy LU-2.4:** Promote high quality, efficient, and cohesive land utilization that minimizes negative impacts (e.g., traffic congestion and visual blight) and environmental hazards (e.g. flood, soil instability) on adjacent areas and infrastructure and preserve existing and future residential areas from encroachment of incompatible activities and land uses.
- **Policy LU-2.6:** Development located adjacent to lands designated for Public Services shall include appropriate setbacks, fencing, and landscaping to avoid land use conflicts.
- **Policy LU-2.7:** Ensure that public facilities located adjacent to areas designated for development include proper setbacks and landscape screening to avoid incompatibilities and provide shielding between uses.

City of Sutter Creek Municipal Code

Sutter Creek Municipal Code provides ordinances for the city that relate to land use and planning. Title 18, Zoning Ordinance, assists with implementing the General Plan to serve the public health, safety, comfort, convenience, and general welfare; to provide for the economic and social advantages resulting from an orderly planned use of land resources; and to encourage, guide, and provide a definite plan for the future growth and development of the city.

City of Jackson Municipal Code

Jackson Municipal Code provides ordinances for the city that relate to land use and planning. Title 17, Development Code, carries out the policies of the Jackson General Plan and regulates the land and structures in the city. It also provides the requirements for the approval of proposed development and new land uses.

City of Ione Municipal Code

Ione Municipal Code provides ordinances for the city that relate to land use and planning. Title 17, Zoning, carries out the policies of the Ione General Plan by classifying and regulating the uses of land and structures in the city, consistent with the General Plan. This zoning code is adopted and established to serve the public health, safety, comfort, convenience, and general welfare and to provide the economic and social advantages resulting from an orderly planned use of land resources, and to encourage, guide and provide a plan for future growth and development of the city.

5.10.1.2 EXISTING CONDITIONS

As described in Chapter 3, *Project Description*, the project sites are all currently used as public schools and are zoned as such, with land use designations of Public or Public Services. Argonaut HS is in the northwest corner of Jackson and is surrounded by residential development and professional office uses. Ione Junior HS is in the southern part of Ione and is surrounded by residential development and rural residential land. Sutter Creek ES is in the northern part of Sutter Creek and is bordered by Amador HS to the south and surrounded by residential and commercial development.

The other campuses as part of the proposed project would experience student enrollment changes, as described in Chapter 3, *Project Description*, but would not include physical improvements to the campuses (except for interior building improvements, such as Jackson Junior HS campus).

5.10.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

LU-1 Physically divide an established community.

LU-2 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.

5.10.3 Environmental Impacts

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.10-1: Project implementation would not physically divide an established community. [Threshold LU-1]

Argonaut High School Site Improvements

Implementation of the proposed project would include adding buildings, relocating portables, converting classrooms, renovating and expanding gymnasium locker rooms, renovating and expanding the kitchen, creating a new parent drop-off, creating a new access road connecting to Stony Creek Road, and improving accessibility

compliance throughout the Argonaut HS campus. These improvements would be made to the existing school campus. As part of the proposed project, the District would obtain a roadway encroachment permit from the City of Jackson to connect the new driveway to Stony Creek Road. Therefore, the project improvements at Argonaut HS would not physically divide a community, and impacts would be **less than significant**.

Ione Junior High School Site Improvements

Implementation of the proposed project would include adding classrooms and a playground, converting classrooms and restrooms, expanding the parent drop-off area, expanding the kitchen, and constructing a new play structure at Ione Junior HS. These improvements would all be made on the existing school campus. Therefore, the project improvements at Ione Junior HS would not physically divide a community, and impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

Implementation of the proposed project would include constructing new classroom buildings and a lunch shelter at Sutter Creek ES. These improvements would all be made on the existing school campus. Therefore, the project improvements at Sutter Creek ES would not physically divide a community, and impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.10-2: Project Implementation would not conflict with applicable plans adopted for the purpose of avoiding or mitigating an environmental effect. [Threshold LU-2]

Argonaut High School Site Improvements

The proposed project includes improvements to the existing Argonaut HS campus to serve the student body of the proposed combined high school. The project improvements at Argonaut HS would all be made on the existing school campus. The proposed project would not affect the existing land use designation (Public) and zoning designation (Public), and therefore the site improvements at Argonaut HS would be consistent with the Jackson General Plan and zoning code. Additionally, construction would follow applicable State and local building codes. Therefore, impacts from the proposed project would be **less than significant** with respect to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Ione Junior High School Site Improvements

The project improvements at Ione Junior HS would all be made on the existing school campus. The proposed project would not affect the existing land use designation (Public Services) and zoning designation (Public Facilities), and therefore the site improvements at Ione Junior HS would be consistent with the Ione General Plan and zoning code. Additionally, construction would follow applicable State and local building codes. Therefore, impacts from the proposed project would be **less than significant** with respect to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Sutter Creek Elementary School Site Improvements

These project improvements at Sutter Creek ES would all be made on the existing school campus. The proposed project would not affect the existing land use designation (Public Service) and zoning designation (Public Service), and therefore the site improvements at Sutter Creek ES would be consistent with the Sutter Creek General Plan and zoning code. Additionally, construction would follow applicable state and local building codes. Therefore, impacts from the proposed project would be **less than significant** with respect to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

Level of Significance Before Mitigation: Less than significant impact.

5.10.4 Mitigation Measures

No mitigation required.

5.10.5 Level of Significance After Mitigation

No mitigation measures are required and the impact remains less than significant.

5.10.6 Cumulative Impacts

A cumulative impact would be considered significant if the project, taken together with past, present, and reasonably foreseeable projects in the identified area, would conflict with applicable land use plans, policies, or regulations. The proposed project includes the school closure/consolidation program across eight of its campuses; three campuses would also have physical site improvements to accommodate the change in student enrollment. As discussed above, the site improvements at the three campuses would be made on existing school campuses, so the proposed project would not physically divide an existing community. Further, the proposed project would be consistent with existing land uses and zoning and would not change any land use designation or zoning. The proposed project does not conflict with any adopted land use plan, policies, or regulations. Therefore, the proposed project would not contribute to a cumulative land use and planning impact, and the impact would be **less than significant**.

5.10.7 References

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LAND USE AND PLANNING

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5.11 NOISE

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the School Closure/Consolidation Program Project to result in noise impacts in the cities of Sutter Creek, Jackson, and Ione. Since different school-aged children produce different levels and types of noise, and as discussed in Section 5.00, *Environmental Analysis*, this section evaluates the proposed project's impacts to noise across the school closure/consolidation program.

The analysis in this section is based in part on the following technical report(s):

- *Noise Impact Assessment for the Amador County Unified School District Project*, ECORP Consulting Inc., December 2023.

A complete copy of this study is included in the technical appendices to this Draft EIR (Appendix H).

5.11.1 Environmental Setting

5.11.1.1 NOISE AND VIBRATION FUNDAMENTALS

Addition of Decibels

The decibel (dB) scale is logarithmic, not linear, and therefore sound levels cannot be added or subtracted with ordinary arithmetic. Two sound levels 10 dB apart differ in acoustic energy by a factor of 10. When the standard logarithmic decibel is A-weighted (dBA), an increase of 10 dBA is generally perceived as a doubling in loudness. For example, a 70 dBA sound is half as loud as an 80 dBA sound and twice as loud as a 60 dBA sound. When two identical sources are each producing sound of the same loudness, the resulting sound level at a given distance would be 3 dB higher than one source under the same conditions. For example, a 65 dB source of sound, such as a truck, when joined by another 65 dB source results in a sound amplitude of 68 dB, not 130 dB (i.e., doubling the source strength increases the sound pressure by 3 dB). Under the decibel scale, three sources of equal loudness together would produce an increase of 5 dB.

Typical noise levels associated with common noise sources are depicted in Figure 5.11-1, *Common Noise Levels*.

Sound Propagation and Attenuation

Sound spreads (propagates) uniformly outward in a spherical pattern, and the sound level decreases (attenuates) at a rate of approximately 6 dB (dBA) for each doubling of distance from a stationary or point source. Sound from a line source, such as a highway, propagates outward in a cylindrical pattern. Sound levels attenuate at a rate of approximately 3 dBA for each doubling of distance from a line source, depending on ground surface characteristics. No excess attenuation is assumed for hard surfaces like a parking lot or a body of water. Soft surfaces, such as soft dirt or grass, can absorb sound, so an excess ground-attenuation value of 1.5 dBA per doubling of distance is normally assumed.

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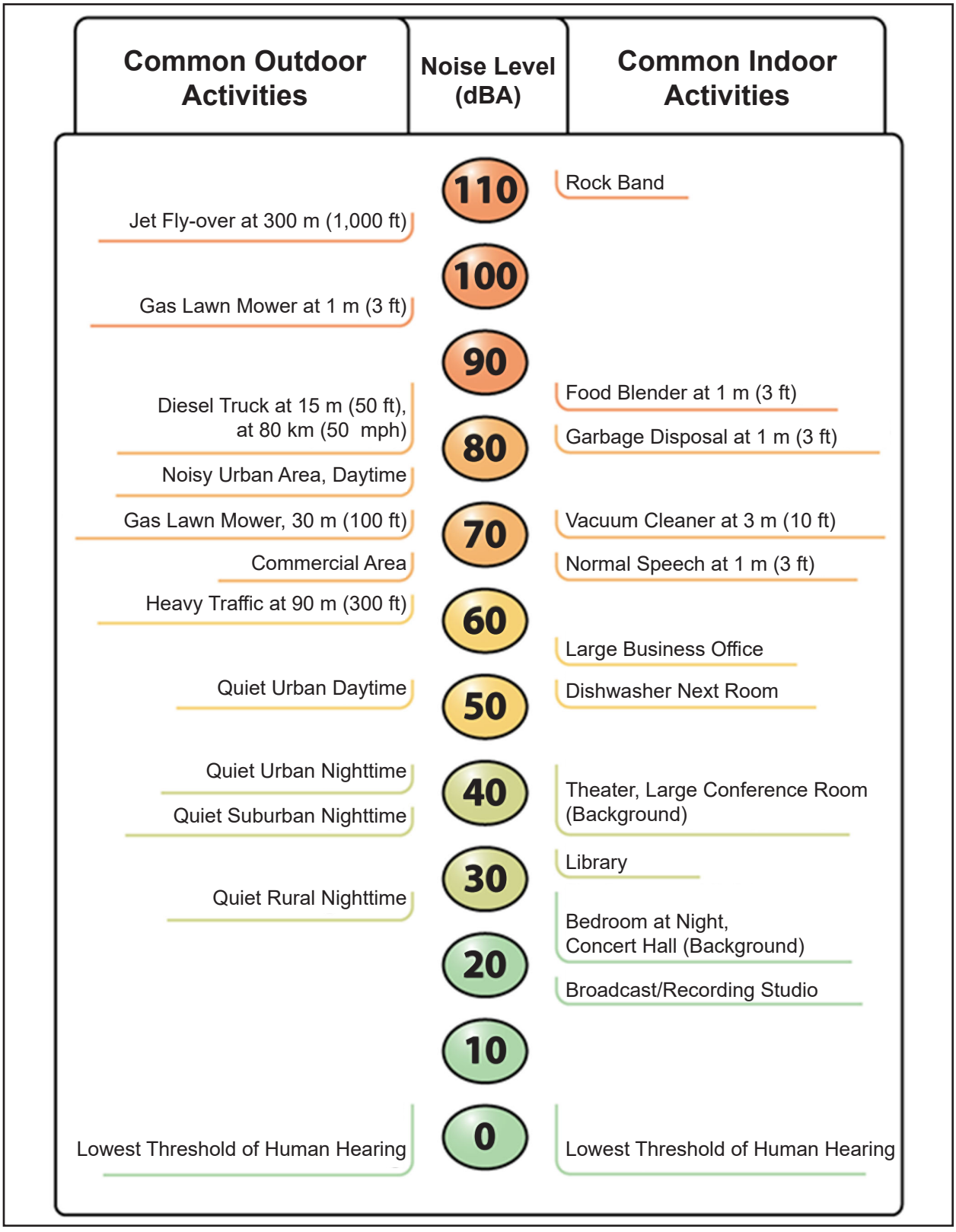
NOISE

Noise levels may also be reduced by intervening structures; generally, a single row of detached buildings between the receptor and the noise source reduces the noise level by about 5 dBA, while a solid wall or berm generally reduces noise levels by 10 to 20 dBA. However, noise barriers or enclosures specifically designed to reduce site-specific construction noise can provide a sound reduction of 35 dBA or greater. To achieve the most potent noise-reducing effect, a noise enclosure/barrier must physically fit in the available space, must completely break the "line of sight" between the noise source and the receptors, must be free of degrading holes or gaps, and must not be flanked by nearby reflective surfaces. Noise barriers must be sizable enough to cover the entire noise source and extend lengthwise and vertically as far as feasibly possible to be most effective. The limiting factor for a noise barrier is not the noise transmitted through the material, but the amount of noise flanking around and over the barrier. In general, barriers contribute to decreasing noise levels only when they break the "line of sight" between the source and the receiver.

Older homes in California generally provide a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more. Generally, in exterior noise environments ranging from 60 dBA Community Noise Equivalent Level (CNEL) to 65 dBA CNEL, interior noise levels can usually be maintained below 45 dBA, a typical residential interior noise standard, with the incorporation of an adequate forced-air mechanical ventilation system in each residential building and standard thermal-pane residential windows/doors with a minimum rating of Sound Transmission Class 28. (Sound transmission class is an integer rating of how well a building partition attenuates airborne sound. In the US, it is widely used to rate interior partitions, ceilings, floors, doors, windows, and exterior wall configurations.) In exterior noise environments of 65 dBA CNEL or greater, a combination of forced-air mechanical ventilation and sound-rated construction materials is often required to meet the interior noise standard. Attaining the necessary noise reduction from exterior to interior spaces is readily achievable in noise environments less than 75 dBA CNEL with proper wall construction techniques following California Building Code methods, the selections of proper windows and doors, and the incorporation of forced-air mechanical ventilation systems.

Figure 5.11-1 - Common Noise Levels



Source: ECORP Consulting, Inc 2023.

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Noise Descriptors

The decibel scale alone does not adequately characterize how humans perceive noise. The dominant frequencies of a sound have a substantial effect on the human response to that sound. Several rating scales have been developed to analyze the adverse effect of community noise on people. Because environmental noise fluctuates over time, these scales consider that the effect of noise on people is largely dependent on the total acoustical energy content of the noise and the time of day when the noise occurs. The noise descriptors most often encountered when dealing with traffic, community, and environmental noise are the average hourly noise level (L_{eq}) and the average daily noise levels/community noise equivalent level (in L_{dn} or CNEL). The L_{eq} is a measure of ambient noise, and the L_{dn} and CNEL are measures of community noise. Each is applicable to this analysis.

- **Equivalent Noise Level (L_{eq})** is the average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.

- **Day-Night Average (L_{dn})** is a 24-hour average L_{eq} with a 10-dBA "weighting" added to noise during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 dBA L_{dn}.

- **Community Noise Equivalent Level (CNEL)** is a 24-hour average L_{eq} with a 5-dBA weighting during the hours of 7:00 pm to 10:00 pm and a 10-dBA weighting added during the hours of 10:00 pm to 7:00 am to account for noise sensitivity in the evening and nighttime, respectively.

Table 5.11-1, *Common Acoustical Descriptors*, provides a list of other common acoustical descriptors.

Table 5.11-1 Typical Noise Levels

Descriptor	Definition
Decibel, dB	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20.
Sound Pressure Level	Sound pressure is the sound force per unit area, usually expressed in micropascals (or 20 micronewtons per square meter), where 1 pascal is the pressure resulting from a force of 1 newton exerted over an area of 1 square meter. The sound pressure level is expressed in decibels as 20 times the logarithm to the base 10 of the ratio between the pressures exerted by the sound to a reference sound pressure (e.g., 20 micropascals). Sound pressure level is the quantity that is directly measured by a sound level meter.
Frequency, Hertz (Hz)	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 Hz and 20,000 Hz. Infrasonic sounds are below 20 Hz and ultrasonic sounds are above 20,000 Hz.
A-Weighted Sound Level, dBA	The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low and very high-frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
Equivalent Noise Level, L_{eq}	The average acoustic energy content of noise for a stated period of time. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night.
L_{max}, L_{min}	The maximum and minimum A-weighted noise level during the measurement period.

Table 5.11-1 Typical Noise Levels

Descriptor	Definition
L_{01}, L_{10}, L_{50}, L_{90}	The A-weighted noise levels that are exceeded 1%, 10%, 50%, and 90% of the time during the measurement period.
Day/Night Noise Level, L_{dn} or DNL	A 24-hour average L_{eq} with a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the nighttime. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 dBA L_{dn}.
Community Noise Equivalent Level, CNEL	A 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 dBA CNEL.
Ambient Noise Level	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
Intrusive	That noise which intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends on its amplitude, duration, frequency, and time of occurrence and tonal or informational content, as well as the prevailing ambient noise level.
Decibel, dB	A unit describing the amplitude of sound, equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20.

Source: ECORP 2023.

The A-weighted decibel sound level scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Because sound levels can vary markedly over a short period of time, a method for describing either the average character of the sound or the statistical behavior of the variations must be used. Most commonly, environmental sounds are described in terms of an average level that has the same acoustical energy as the summation of all the time-varying events.

The scientific instrument used to measure noise is the sound level meter. Sound level meters can accurately measure environmental noise levels to within about ±1 dBA. Various computer models are used to predict environmental noise levels from sources, such as roadways and airports. The accuracy of the predicted models depends on the distance between the receptor and the noise source. Close to the noise source, the models are accurate to within about 1 to 2 dBA.

Human Response to Noise

The human response to environmental noise is subjective and varies considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to undue stress and annoyance. The health effects of noise in the community arise from interference with human activities, including sleep, speech, recreation, and tasks that demand concentration or coordination. Hearing loss can occur at the highest noise intensity levels.

Noise environments and consequences of human activities are usually well represented by median noise levels during the day or night or over a 24-hour period. Environmental noise levels are generally considered low when the CNEL or L_{dn} is below 60 dBA, moderate in the 60 to 70 dBA range, and high above 70 dBA. Examples of low daytime levels are isolated, natural settings with noise levels as low as 20 dBA and quiet, suburban,

residential streets with noise levels around 40 dBA. Noise levels above 45 dBA at night can disrupt sleep. Examples of moderate-level noise environments are urban residential or semi-commercial areas (typically 55 to 60 dBA) and commercial locations (typically 60 dBA). People may consider louder environments adverse, but most will accept the higher levels associated with noisier urban residential or residential-commercial areas (60 to 75 dBA) or dense urban or industrial areas (65 to 80 dBA). Regarding increases in A-weighted noise levels (dBA), the following relationships should be noted in understanding this analysis:

- Except in carefully controlled laboratory experiments, a change of 1 dBA cannot be perceived by humans.
- Outside of the laboratory, a 3 dBA change is considered a just-perceivable difference.
- A change in level of at least 5 dBA is required before any noticeable change in community response would be expected. An increase of 5 dBA is typically considered substantial.
- A 10-dBA change is subjectively heard as an approximate doubling in loudness and would almost certainly cause an adverse change in community response.

Effects of Noise on People

Hearing Loss

While physical damage to the ear from an intense noise impulse is rare, a degradation of auditory acuity can occur even within a community noise environment. Hearing loss occurs mainly due to chronic exposure to excessive noise but may be due to a single event such as an explosion. Natural hearing loss associated with aging may also be accelerated from chronic exposure to loud noise.

The Occupational Safety and Health Administration has a noise exposure standard that is set at the noise threshold where hearing loss may occur from long-term exposures. The maximum allowable level is 90 dBA averaged over eight hours. If the noise is above 90 dBA, the allowable exposure time is correspondingly shorter.

Annoyance

Attitude surveys are used for measuring the annoyance felt in a community for noises intruding into homes or affecting outdoor activity areas. In these surveys, it was determined that causes for annoyance include interference with speech, radio, and television; house vibrations; and interference with sleep and rest. The L_{dn} as a measure of noise has been found to provide a valid correlation of noise level and the percentage of people annoyed. People have been asked to judge the annoyance caused by aircraft noise and ground transportation noise. There continues to be disagreement about the relative annoyance of these different sources.

Fundamentals of Environmental Groundborne Vibration

Vibration Sources and Characteristics

Sources of earth-borne vibrations include natural phenomena (e.g., earthquakes, volcanic eruptions, sea waves, landslides) or human causes (explosions, machinery, traffic, trains, construction equipment, etc.). Vibration sources may be continuous (e.g., factory machinery) or transient (e.g., explosions).

Ground vibration consists of rapidly fluctuating motions or waves. Several different methods are typically used to quantify vibration amplitude. One is the peak particle velocity (PPV); another is the root mean square (RMS) velocity. The PPV is defined as the maximum instantaneous positive or negative peak of the vibration wave. The RMS velocity is defined as the average of the squared amplitude of the signal. The PPV and RMS vibration velocity amplitudes are used to evaluate human response to vibration.

PPV is generally accepted as the most appropriate descriptor for evaluating the potential for building damage. For human response, however, an average vibration amplitude is more appropriate because it takes time for the human body to respond, and the human body responds to an average vibration amplitude, not a peak amplitude, so the RMS amplitude is typically used to assess human response. The RMS value is the average of the amplitude squared over time, typically one second.

Table 5.11-2, *Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibration Levels*, displays the reactions of people and the effects on buildings produced by continuous vibration levels. The annoyance levels shown in the table should be interpreted with care since vibration may be annoying at much lower levels than those listed, depending on the level of activity or the sensitivity of the individual. To sensitive individuals, vibrations approaching the threshold of perception can be annoying. Low-level vibrations frequently cause irritating secondary vibration, such as a slight rattling of windows, doors, or stacked dishes. In high-noise environments, which are more prevalent where groundborne vibration approaches perceptible levels, this rattling phenomenon may also be produced by loud airborne environmental noise inducing vibration in exterior doors and windows.

Ground vibration can be a concern in instances where buildings shake and substantial rumblings occur. However, it is unusual for vibration from typical urban sources such as buses and heavy trucks to be perceptible. For instance, heavy-duty trucks generate groundborne vibration velocity levels of 0.006 PPV at 50 feet under typical circumstances, which, as identified in Table 5.11-2, is considered very unlikely to cause damage to buildings of any type. Common sources for groundborne vibration are planes, trains, and construction activities such as earth moving, which requires the use of heavy-duty earth-moving equipment.

Table 5.11-2 Human Reaction and Damage to Buildings for Continuous or Frequent Intermittent Vibration Levels

Peak Particle Velocity (inches/second)	Approximate Vibration Velocity Level (VdB)	Human Reaction	Effect on Buildings
0.006–0.019	64–74	Range of threshold of perception	Vibrations unlikely to cause damage of any type
0.08	87	Vibrations readily perceptible	Threshold at which there is a risk of architectural damage to extremely fragile historic buildings, ruins, ancient monuments
0.1	92	Level at which continuous vibrations may begin to annoy people, particularly those involved in vibration sensitive activities	Threshold at which there is a risk of architectural damage to fragile buildings. Virtually no risk of architectural damage to normal buildings
0.25	94	Vibrations may begin to annoy people in buildings	Threshold at which there is a risk of architectural damage to historic and some old buildings
0.3	96	Vibrations may begin to feel severe to people in buildings	Threshold at which there is a risk of architectural damage to older residential structures
0.5	103	Vibrations considered unpleasant by people subjected to continuous vibrations	Threshold at which there is a risk of architectural damage to new residential structures and Modern industrial/commercial buildings

Source: ECORP 2023.

5.11.1.2 REGULATORY BACKGROUND

Federal

Occupational Safety and Health Act of 1970

The Occupational Safety and Health Administration regulates onsite noise levels and protects workers from occupational noise exposure. To protect hearing, worker noise exposure is limited to 90 dBA over an eight-hour work shift (California Code of Regulations, Title 29, Section 1910.95). Employers are required to develop a hearing conservation program when employees are exposed to noise levels exceeding 85 dBA. These programs include providing hearing protection devices and testing employees for hearing loss on a periodic basis.

National Institute of Occupational Safety and Health

A division of the US Department of Health and Human Services, the National Institute for Occupational Safety and Health (NIOSH) has established a construction-related noise level threshold as identified in the Criteria for a Recommended Standard: Occupational Noise Exposure prepared in 1998. NIOSH identifies a noise level threshold based on the duration of exposure to the source. The NIOSH construction-related noise level threshold starts at 85 dBA for no more than eight hours per day; for every 3 dBA increase, the exposure time is cut in half. This reduction results in noise level thresholds of 88 dBA for no more than four hours per

day, 92 dBA for no more than one hour per day, 96 dBA for no more than 30 minutes per day, and up to 100 dBA for no more than 15 minutes per day. The intention of these thresholds is to protect people from hearing losses resulting from occupational noise exposure.

Federal Interagency Commission on Noise

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

- If the existing ambient noise levels at existing noise-sensitive land uses (residential, etc.) are less than 60 dBA CNEL and the project creates a readily perceptible 5 dBA CNEL or greater project-related noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or
- If the existing noise levels range from 60 to 65 dBA CNEL and the project creates a barely perceptible 3 dBA CNEL or greater project-related noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or
- If the existing noise levels already exceed 65 dBA CNEL, and the project creates a community noise level increase of greater than 1.5 dBA CNEL.

State

State of California General Plan Guidelines

The State of California regulates vehicular and freeway noise affecting classrooms, sets standards for sound transmission and occupational noise control, and identifies noise insulation standards and airport noise/land-use compatibility criteria. The State of California General Plan Guidelines, published by the Governor's Office of Planning and Research, also provides guidance for the acceptability of projects within specific CNEL/L_{dn} contours. The guidelines also present adjustment factors that may be used in order to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

State Office of Planning and Research Noise Element Guidelines

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

California Department of Transportation

In 2020, the California Department of Transportation (Caltrans) published the Transportation and Construction Vibration Manual. The manual provides general guidance on vibration issues associated with the construction and operation of projects concerning human perception and structural damage. Table 5.11-2

above presents recommendations for levels of vibration that could result in damage to structures exposed to continuous vibration.

Local

Sutter Creek General Plan

The existing Amador HS campus and Sutter Creek ES campus are in the City of Sutter Creek. The Noise Element of the Sutter Creek General Plan identifies and appraises noise problems in the community. The Noise Element contains goals, objectives, policies and implementation measures to protect noise sensitive land uses within the community (Sutter Creek 2019). Those applicable to the project are presented below:

- **Goal N-1:** Prevent exposure of Sutter Creek citizens to unacceptable noise levels.
- **Goal N-2:** Alleviate noise exposure problems where feasible.
    - **Objective N-1.1:** The prevention and mitigation of exposure to unacceptable noise levels.
        - **Policy N-1.1.2:** The outdoor noise standard for residential developments shall apply only to back yards of single-family residences and recreation areas of multifamily developments. The outdoor noise standard shall also not apply to residentially-designated properties or existing noise sensitive land uses within the current 60+ dB contour shown on Volume III Figure 6-2.
        - **Policy N-1.1.4:** The City shall protect existing (ambient) noise levels of existing residential neighborhoods and other existing noise sensitive land uses. If a developed area is currently below an adopted noise standard, an increase in noise up to the standard should not necessarily be allowed.
        - **Policy N-1.1.6:** Large trucks should be discouraged on Old Highway 49 (except possibly for deliveries or when large trucks operate from a base located in the City).

Sutter Creek Municipal Code

The City of Sutter Creek's regulations with respect to noise are also included in Title 10, Public Peace, Safety and Morals, of the City's Municipal Code. Specifically, Chapter 10.50, Noise Regulations, presents exterior acceptable noise levels based on community environment classifications for a variety of land uses and are presented in Table 5.11-3, *Sutter Creek Exterior Noise Limits*.

Table 5.11-3 Sutter Creek Exterior Noise Limits

Noise Zone	Time Period	Community Environment Classification (dBA)		
		Very Quiet (Rural)	Quiet (Suburban)	Slightly Noisy (Urban)
One- and Two-Family Dwelling	10:00 p.m. to 7:00 a.m.	35 dBA	40	45
	7:00 a.m. to 10:00 p.m.	40 dBA	45	50

Source: ECORP 2023.

Additionally, Section 10.50.120 states that construction is prohibited between the hours of 7:00 p.m. of and 7:00 a.m.

Jackson General Plan

The existing Argonaut HS campus, Jackson Junior HS campus, and Jackson ES campus are in the City of Jackson. The Noise Element of the General Plan appraises noise problems in the community and identifies policies and implementation measures to minimize the scale of nuisance (Jackson 1987). Those applicable to the project are as follows:

- **Policy 1:** Establish standards for ambient community noise.
  - **Implementation 1.1:** The City of Jackson has previously adopted the Land Use Compatibility for Community Noise Environments chart from the Office of Noise Control's Noise Environment Guidelines. That chart continues to be a valid guideline from determination of noise compatible land uses.
  - **Implementation 1.2:** Utilize the standards of Title 24 of the California Administrative Code for effective sound transmission controls in new construction.

Table 5.11-4, *Land Use Compatibility-Jackson General Plan*, summarizes the chart identified in Implementation 1.1.

Table 5.11-4 Land Use Compatibility-Jackson General Plan (1987)

Noise Zone	Exterior Noise Exposure (Ldn)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Residential – Low Density Single Family, Duplex, Mobile Homes	0-60	55-70	70-75	>75
Residential – Multi Family	0-65	60-70	70-75	>75
Transient Lodging – Motels, Hotels	0-65	60-70	70-80	>80
Schools, Libraires, Churches, Hospitals, Nursing Homes	0-70	60-70	70-80	>80
Auditoriums, Concert Halls, Amphitheaters	N/A	0-70	>65	N/A
Sports Arena, Outdoor Spectator Sports	N/A	0-75	>70	N/A
Playgrounds, Neighborhood Parks	0-70	68-75	>72	N/A
Golf Courses, Riding Stables, Water Recreation, Cemeteries	0-75	N/A	70-80	>80
Office Building, Business, Commercial and Professional	0-70	68-77	N/A	>75
Industrial Manufacturing, Utilities and Agriculture	0-75	70-80	N/A	>75

Source: ECORP 2023.
Notes:
Normally Acceptable (NA)= Specific land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
Conditionally Acceptable (CA)= New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
Normally Unacceptable (NU)= New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and noise insulation features included in the design.
Clearly Unacceptable (CU)= New construction or development should generally not be undertaken.

- **Policy 2:** Reduce levels of noise created by construction equipment.
  - **Implementation 2.1:** All grading and other heavy equipment associated with site development processes should be acoustically muffled in accordance with Caltrans Specification Standards.
  - **Implementation 2.2:** On a project specific basis, construction start up time in the morning and ending time in the evening will be controlled so as to not adversely affect adjacent uses.
- **Policy 3:** Provide for early review and identification of potential noise concerns associated with new development.
  - **Implementation 3.1:** Utilize the provisions of the State CEQA Guidelines for preliminary review of projects in order to identify noise concerns.

Currently, the City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city.

The City of Jackson General Plan Update 2040 contains the goals and policies that will guide future decisions within the City and identifies action items (implementation measures) to ensure the vision and goals of the General Plan are carried out. The Noise Element of General Plan Update 2040 appraises noise problems in the community and identifies policies and implementation measures to minimize the scale of nuisance.

Those General Plan Update 2040 policy provisions applicable to the Project are as follows:

- **Policy N 1.1:** Consider the noise compatibility of existing and future development when making land use planning decisions.
- **Policy N 1.2:** Require development projects and changes to existing uses to be consistent with the standards indicated in Table N-1 [Table 5.11-5 in below] to ensure acceptable noise levels for existing and future development.

Table 5.11-5 Land Use Compatibility-Jackson General Plan Update (2023)

Noise Zone	Exterior Noise Exposure (Ldn)			
	Normally Acceptable	Conditionally Acceptable	Normally Unacceptable	Clearly Unacceptable
Single-Family Residential Duplex	0-60	60-70	70-75	>75
Multi-Family Residential	0-65	65-70	70-75	>75
Hotels and Motels	0-65	65-70	70-80	>80
Schools, Libraries, Churches, Hospitals, Personal Care	0-65	65-70	70-80	>80
Auditoriums, Concert Halls, Amphitheaters	0-65	65-70	N/A	>70
Outdoor Sports and Recreation, Neighborhood Parks and Playgrounds	0-65	65-75	N/A	>75
Office Buildings, Business, Commercial and Professional	0-70	70-75	>75	N/A
Industrial, Manufacturing, Utilities, Agriculture	0-75	75-80	>80	N/A

Source: ECORP 2023.
Notes:
Normally Acceptable (NA)= Specific land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.
Conditionally Acceptable (CA)= New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.
Normally Unacceptable (NU)= New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and noise insulation features included in the design.
Clearly Unacceptable (CU)= New construction or development should generally not be undertaken.

- **Policy N 1.3:** Require new development to reduce excessive noise to the standards indicated in Tables N-1 and N-2 [Tables 5.11-5 and 5.11-6] through best practices, including building location and orientation, building design features, placement of noise-generating equipment away from sensitive receptors, shielding of noise-generating equipment, placement of noise-tolerant features between noise sources and sensitive receptors, and use of noise-minimizing materials.

Table 5.11-6 Stationary Non-Transportation Noise Source Standards – Jackson General Plan Update (2023)

Land Use Receiving the Noise	Hourly Noise Level Descriptor	Exterior Noise-Level Standard (dBA)	
		Daytime (7:00am – 10:00 pm)	Nighttime (10:00 pm – 7:00 am)
Residential	Leq	55	45
	Lmax	70	65

Source: ECORP 2023.
Notes:
a. The residential standards apply to all properties that are zoned for residential use. The exterior noise level standard is to be applied at the property line of the receiving land use or at a designated outdoor activity area. For multi-family and mixed-use projects, the exterior noise level standard may be waived (at the discretion of the decision-making body) if the residential portion of the project does not include a designated activity area and mitigation of noise at the property line is not practical.
b. Each of the noise levels specified above shall be lowered by 5 dBA for tonal noises characterized by a whine, screech, or hum, noises consisting primarily of speech or music, or recurring impulsive noises. In no case shall mitigation be required to a level that is less than existing ambient noise levels, as determined through measurements conducted during the same operational period as the subject noise source.
c. In situations where the existing noise level exceeds the noise levels indicated in the above table, any new noise source must include mitigation that reduces the noise level of the noise source to the existing level plus 3 dBA.

Additional goals, policies, and actions related to noise are outlined below (Jackson 2023).

- **Goal N-1:** Preserve and enhance the existing and future noise environment by minimizing exposure to harmful and excessive noise throughout the community.
- **Policy N 1.4:** Ensure that new development does not result in indoor noise levels exceeding 45 dBA L_{dn} for residential uses by requiring the implementation of construction techniques and noise reduction measures for all new residential development.
- **Policy N 1.5:** Require acoustical studies for new noise-generating and noise-sensitive developments, and transportation improvements that would increase roadway capacity or move traffic closer to sensitive receptors.
- **Policy N 1.6:** For projects that are required to prepare an acoustical study, the following stationary and transportation noise source criteria shall be used to determine the significance of those impacts:
  - Stationary and Non-Transportation Noise Sources
    - A significant impact will occur if the project results in an exceedance of the noise level standards contained in this element, or for instances where the ambient noise level is already above the standards contained in this element, the project will result in an increase in ambient noise levels by more than 3 dBA, whichever is greater.
    - This does not apply to construction activities which are conducted according to the best practices outlined in Action N-1b. Compliance with these requirements shall be sufficient to reduce temporary construction-related noise impacts to a less than significant level.
  - Transportation Noise Sources
    - Where existing traffic noise levels are 60 dBA L_{dn} or less at the outdoor activity areas of noise-sensitive uses, a +5 dBA L_{dn} increase in roadway noise levels will be considered significant;
    - Where existing traffic noise levels are greater than 60 dBA L_{dn} and up to 65 dBA L_{dn} at the outdoor activity areas of noise-sensitive uses, a +3 dBA L_{dn} increase in roadway noise levels will be considered significant; and
    - Where existing traffic noise levels are greater than 65 dBA L_{dn} at the outdoor activity areas of noise-sensitive uses, a +1.5 dBA L_{dn} increase in roadway noise levels will be considered significant.
- **Policy N 1.b:** Update the Municipal Code to include the following construction noise best practices and requirements:
  - Establish standards for when a construction staging and phasing plan shall be required for new development projects and significant remodels.
  - At all times during project grading and construction, stationary noise-generating equipment shall be located as far as practicable from sensitive receptors and placed so that emitted noise is directed away from residences.
  - Unnecessary idling of internal combustion engines shall be prohibited.

- Construction staging areas shall be established at locations that will create the greatest distance between the construction-related noise sources and noise-sensitive receptors nearest the project site during all project construction activities, to the extent feasible.
- The construction contractor shall designate a "noise disturbance coordinator" who will be responsible for responding to any local complaints about construction noise. The disturbance coordinator shall be responsible for determining the cause of the noise complaint (e.g., starting too early, poor muffler, etc.) and instituting reasonable measures as warranted to correct the problem. A telephone number for the disturbance coordinator shall be conspicuously posted at the construction site.

Jackson Municipal Code

The City of Jackson's regulations with respect to noise are in Title 9, Chapter 9.48, of the City's Municipal Code. Specifically, Section 9.48.070 prohibits construction between the hours of 8:00 p.m. to 7:00 a.m. on weekdays that are not holidays, between 7:00 p.m. and 8:00 a.m. on Saturdays, and between 5:00 p.m. to 9:00 a.m. on Sundays.

Ione General Plan

The existing Ione Junior HS campus is in the City of Ione. The Noise and Safety Element of the Ione General Plan was designed to promote a safe and high-quality community. The Noise and Safety Element contains goals and policies that identify the standards that the City will use during planning and development to ensure the safety of residents and to provide an environment free of excessive noise disturbances (Ione 2009). Those applicable to the proposed project are as follows:

- **Goal NS-1:** New development will reduce unnecessary noise disturbances.
- **Policy NS-1.1:** Establish the Noise Level Performance Standards in [Table 5.11-7, City of Ione Exterior Noise Level Performance Standards for Non-transportation Noise] and [Table 5.11-8, City of Ione Noise Level Performance Standards for All Noise Sources, Including Transportation Noise] to govern maximum allowable sound levels in all new development.

Table 5.11-7 City of Ione Exterior Noise Level Performance Standards for Nontransportation Noise

Land Use Type	Maximum Noise Exposure Level (dBA)	
	7:00 a.m. – 10:00 p.m.	10:00 p.m. – 7:00 a.m.
Single Family Homes	55	45
Multi-Family Residential	60	45

Source: ECORP 2023.
Notes: The City may impose noise level standards which are more or less restrictive than those specified above based upon determination of existing low or high ambient noise levels.

Table 5.11-8 City of Ione Noise Level Performance Standards for All Noise Sources, Including Transportation Noise

Land Use Type	Maximum Noise Exposure Level (dBA)	
	Outdoor Activity Areas[1]	Interior Spaces
Residential	60[2]	45
Churches	60[2]	45
Playgrounds, Neighborhood Parks	70	--
Schools, Libraries, Museums	--	45
Nursing Homes/ Hospitals	60[2]	45

Source: ECORP 2023.
Notes:
[1]Outdoor activity areas are property locations where an individual spends the most outdoor time or where people are likely to congregate. Where the outdoor activity area is unknown, the exterior noise level standard shall be applied to the property line of the receiving land use. Where it is not practical to mitigate exterior noise levels at patio or balconies of apartment complexes, a common area such as a pool or recreation area may be designated as the outdoor activity area.
[2]Where it is not possible to reduce noise in outdoor activity areas to 60 dBA or less using a practical application of the best available noise reduction measures, an exterior noise level of up to 65 dBA may be allowed provided that available exterior noise level reduction measures have been implemented and interior noise levels are in compliance with this table. The City may impose noise level standards which are more or less restrictive than those specified above based upon determination of existing low or high ambient noise levels.

- **Policy NS-1.2:** Ensure the outdoor and indoor areas of new projects will be located, constructed and/or shielded from noise sources in compliance with the City's noise standards.
- **Policy NS-1.3:** Ensure that proposed development likely to exceed the City's standards do not create noise disturbance in existing noise-sensitive areas.
- **Policy NS-1.4:** Mitigate noise created by proposed non-transportation noise sources to comply with the City's noise standards to the maximum extent feasible.
- **Policy NS-1.5:** Mitigate noise created by the construction of new transportation noise sources to the maximum extent feasible to comply with the City's standards.

Ione Municipal Code

The standards for noise are displayed in Title 9, Public Peace, Morals and Welfare, in the City of Ione's Municipal Code. Specifically, Section 9.16.040 prohibits construction between the hours of 9:00 p.m. through 7:00 a.m. Monday through Thursday, and 10:00 p.m. through 7:00 a.m. Friday through Sunday, or any time on federal or state holidays.

5.11.1.3 EXISTING CONDITIONS

Noise-Sensitive Land Uses

Noise-sensitive land uses generally include uses where noise exposure could result in health-related risks to individuals as well as places where quiet is an essential element of their intended purpose. Residential dwellings are of primary concern because of the potential for increased and prolonged exposure of individuals to both interior and exterior noise levels. Additional land uses such as hospitals, historic sites, cemeteries, and certain

recreation areas are considered sensitive to increases in exterior noise levels. Schools, churches, hotels, libraries, and other places where low interior noise levels are essential are also considered noise-sensitive land uses.

As previously described, the project proposes the consolidation of eight schools, spanning three cities, onto six ACUSD campuses. The nearest off-site noise sensitive receptors to each campus are identified below:

- Amador HS: residences to the east, south, and west of campus, and Sutter Creek ES to the north.
- Argonaut HS: residences to the north and south of campus.
- Ione Junior HS: residences to the north of campus.
- Jackson Junior HS: residence to the east and south of campus.
- Jackson ES: residences to the east, south, and west of campus.
- Sutter Creek ES: residences to the north and east of campus, and Amador HS to the south.

Existing Ambient Noise Environment

The proposed project would consolidate eight campuses to six campuses. The six campuses span three cities located in Amador County. The most common and significant source of noise in Amador County as well as in the three cities of Jackson, Ione, and Sutter Creek is mobile noise generated by transportation-related sources. Other sources of noise are the various land uses (i.e., residential, commercial, and industrial) that generate stationary-source noise. The six campuses are all existing school campuses in developed areas that are surrounded mainly by residential land uses.

The American National Standards Institute (ANSI) Standard 12.9-2013/Part 3 "Quantities and Procedures for Description and Measurement of Environmental Sound—Part 3: Short-Term Measurements with an Observer Present" provides a table of approximate background sound levels in CNEL, daytime Leq, and nighttime Leq based on land use and population density. The ANSI standard estimation divides land uses into six distinct categories. Descriptions of these land use categories, along with the typical daytime and nighttime levels, are provided in Table 5.11-9, *ANSI Standard 12.9-2013/Part 3 A-Weighted Sound Levels Corresponding to Land Use and Population Density*. At times, one could reasonably expect the occurrence of periods that are both louder and quieter than the levels listed in the table. The 95 percent confidence interval is plus or minus 10 dB. Because the project sites are all existing school campuses in developed areas that are surrounded mainly by residential land uses, they would generally be considered ambient noise Category 3 and generally experiences noise levels of 57 dBA CNEL.

Table 5.11-9 ANSI Standard 12.9-2013/Part 3 A-Weighted Sound Levels Corresponding to Land Use and Population Density

Category	Land Use	Description	People per Square Mile	Typical CNEL	Daytime L_{eq}	Nighttime L_{eq}
1	Noisy Commercial and Industrial Areas and Very Noisy Residential Areas	Very heavy traffic conditions, such as in busy, downtown commercial areas; at intersections for mass transportation or for other vehicles, including elevated trains, heavy motor trucks, and other heavy traffic; and at street corners where many motor buses and heavy trucks accelerate.	63,840	67 dBA	66 dBA	58 dBA
2	Moderate Commercial and Industrial Areas and Noisy Residential Areas	Heavy traffic areas with conditions similar to Category 1, but with somewhat less traffic; routes of relatively heavy or fast automobile traffic, but where heavy truck traffic is not extremely dense.	20,000	62 dBA	61 dBA	54 dBA
3	Quiet Commercial, Industrial Areas and Normal Urban and Noisy Suburban Residential Areas	Light traffic conditions where no mass transportation vehicles and relatively few automobiles and trucks pass, and where these vehicles generally travel at moderate speeds; residential areas and commercial streets, and intersections, with little traffic compose this category.	6,384	57 dBA	55 dBA	49 dBA
4	Quiet Urban and Normal Suburban Residential Areas	These areas are similar to Category 3, but for this group, the background is either distant traffic or is unidentifiable; typically, the population density is one-third the density of Category 3.	2,000	52 dBA	50 dBA	44 dBA
5	Quiet Residential Areas	These areas are isolated, far from significant sources of sound, and may be situated in shielded areas, such as a small wooded valley.	638	47 dBA	45 dBA	39 dBA
6	Very Quiet Sparse Suburban or Rural Residential Areas	These areas are similar to Category 4 but are usually in sparse suburban or rural areas; and, for this group, there are few if any nearby sources of sound.	200	42 dBA	40 dBA	34 dBA

Source: ECORP 2023.

Existing Roadway Noise Levels

Existing roadway noise levels were calculated for the roadway segments in the vicinity of the existing six campuses. This task was accomplished using the Federal Highway Administration's (FHWA) Highway Traffic Noise Prediction Model (FHWA-RD-77-108) (see Appendix H to this DEIR) and traffic volumes from the proposed project (see in Appendix C). The model calculates the average noise level at specific locations based on traffic volumes, average speeds, roadway geometry, and site environmental conditions. The average vehicle noise rates (energy rates) used in the FHWA model have been modified to reflect average vehicle noise rates identified for California by the California Department of Transportations (Caltrans). The Caltrans data show that California automobile noise is 0.8 to 1.0 dBA higher than national levels and that medium and heavy truck noise is 0.3 to 3.0 dBA lower than national levels. The average daily noise levels along these roadway segments are presented in Table 5.11-10, *Existing (Baseline) Traffic Noise Levels.*

Table 5.11-10 Existing (Baseline) Traffic Noise Levels

Roadway Segment	Surrounding Uses	CNEL 100 feet from Center of Road
State Route 88 West of Argonaut Lane	Residential and Commercial	66.3
State Route 88 Between Argonaut Lane and Hoffman Street	Residential	65.5
State Route 88 South of Hoffman Street	Residential and Commercial	66.9
Argonaut Lane Between CA 88 and Westview Drive	Residential	53.3
Argonaut Lane Between Westview Dive and Stony Creek Road	Residential and Educational	54.8
Hoffman Street/ Stony Creek Road West of Argonaut Lane	Residential and Educational	52.6
Hoffman Street/ Stony Creek Road Between Argonaut Lane and CA 88	Residential	51.7
Church Street North of Market Street	Residential	60.6
Church Street Between Market Street and Relihan Drive	Residential	60.7
Church Street South of Relihan Drive	Residential	61.1
Market Street West of Church Street	Residential	51.4
Market Street East of Church Street	Residential	54.2
Relihan Drive West of Church	Residential	46.3
Marlette Street West of Mills Street	Residential	53.4
Marlette Street Between Mills Street and Sacramento Street	Residential	54.8
Marlette Street East of Church Street	Residential	50.6
Mills Street North of Marlette Street	Residential	42.1
Mills Street South of Marlette Street	Residential	47.4
Sacramento Street North of Marlette Street	Residential	51.5
Sacramento Street South of Marlette Street	Residential	46.5

Source: ECORP 2023.

As shown, the existing traffic-generated noise level on project-vicinity roadways currently ranges from 42.1 to 66.9 dBA CNEL at a distance of 100 feet from the centerline. As previously described, CNEL is 24-hour average noise level with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively.

5.11.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would result in:

N-1 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.

N-2 Generation of excessive groundborne vibration or groundborne noise levels.

N-3 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, if the project would expose people residing or working in the project area to excessive noise levels.

Methodology

Construction

For the purposes of this analysis, Project construction noise is analyzed for the three campuses where physical site improvements are being proposed. Construction noise is compared to the allowable hours of construction mandated by each jurisdiction as well as the NIOSH standard of 85 dBA for more than 8 hours per day, since construction work for the Proposed Project is anticipated to span a typical workday of 8 hours daily. The City of Sutter Creek, Jackson and Ione do not regulate vibrations associated with construction or operations. However, a discussion of construction vibration is included for full disclosure purposes. For comparison purposes, Project groundborne vibration is evaluated against the Caltrans recommended standard of 0.3 inches per second PPV with respect to the prevention of structural damage for older residential buildings is used as a threshold. This is also the level at which vibrations may begin to annoy people in buildings. Once the Project is complete, the campuses would not be a source of groundborne vibration during operations.

Noise generated as each campus as a result of the proposed project are compared against the standards set forth by the appropriate jurisdiction and are described in detail below. Noise generated by the proposed project's offsite transportation noise is compared to the FICON thresholds of significance in the evaluation of increased traffic noise. It is noted that the FICON thresholds of significance are the same as the City of Jackson's transportation-related noise thresholds of significance, as proposed by Jackson General Plan Update 2040 Policy N 1.6. Neither the City of Sutter Creek General Plan, City of Jackson 1987 General Plan Noise Element, or City of Ion General specifically promulgate transportation-related noise standards.

The analysis of the existing and future noise environments is based on empirical observations and noise prediction modeling. Predicted construction noise levels were calculated using the FHWA's Roadway Construction Noise Model (2006). Groundborne vibration levels associated with construction-related activities for the proposed project have been evaluated using typical groundborne vibration levels associated with construction equipment. Potential groundborne vibration impacts related to structural damage and human annoyance were evaluated, taking into account the distance from construction activities to nearby structures and typically applied criteria for structural damage and human annoyance. On-site stationary source noise levels associated with the project have been calculated with the SoundPLAN 3D noise model, which predicts noise propagation based on the location, noise level, and frequency spectra of the noise source as well as the geometry and reflective properties of the local terrain, buildings, and barriers. Transportation-source noise levels have been calculated from trip information and the FHWA Highway Traffic Noise Prediction Model (FHWA-RD-77-108).

5.11.3 Environmental Impacts

5.11.3.1 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance for potentially significant impacts. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.11-1: Construction activities would result in temporary noise increases in the vicinity of the proposed project that would not exceed local standards. [Threshold N-1]

Construction noise associated with the proposed project would be temporary and would vary depending on the specific nature of the activities being performed. Noise generated would primarily be associated with the operation of off-road equipment for on-site construction activities as well as construction vehicle traffic on area roadways. Construction noise typically occurs intermittently and varies depending on the nature or phase of construction (e.g., site preparation, excavation, paving). Noise generated by construction equipment, including earth movers, pile drivers, and portable generators, can reach high levels. Typical operating cycles for these types of construction equipment may involve one or two minutes of full power operation followed by three to four minutes at lower power settings. Other primary sources of acoustical disturbance would be random incidents, which would last less than one minute (such as dropping large pieces of equipment or the hydraulic movement of machinery lifts). During construction, exterior noise levels could negatively affect sensitive land uses in the vicinity of the construction site.

As previously described, the proposed project would include physical site improvements at three campuses—Argonaut HS, Ione Junior HS, and Sutter Creek ES in the cities of Jackson, Ione, and Sutter Creek, respectively. All jurisdictions regulate times that construction can take place but do not have numeric thresholds for construction noise, which is temporary, short term, and intermittent and would cease on completion of the project. It is noted that proposed improvements at Jackson Junior HS include the conversion of restrooms and fountains with age-appropriate fixtures, but these improvements are not analyzed because they would mainly occur inside existing buildings and would primarily employ the use of hand tools, which generate significantly lower noise levels.

To estimate the worst-case on-site construction noise levels at the nearest noise-sensitive receptors and to evaluate the potential health-related effects (physical damage to the ear) from construction noise, the construction equipment noise levels were calculated using the FHWA's Roadway Noise Construction Model and compared against the construction-related noise level threshold established in the "Criteria for a Recommended Standard: Occupational Noise Exposure" (1998) by NIOSH. A division of the U.S. Department of Health and Human Services, NIOSH identifies a noise level threshold based on the duration of exposure to the source. The NIOSH construction-related noise level threshold starts at 85 dBA for no more than eight hours per day; for every 3 dBA increase, the exposure time is cut in half. For the purposes of this analysis, the lowest, more conservative threshold of 85 dBA Leq is used as an acceptable threshold for construction noise at nearby sensitive receptors. It is acknowledged that the majority of construction equipment is not situated at any one location during construction activities, but spread throughout the project site at various distances from sensitive receptors. Therefore, this analysis employs FTA guidance for calculating construction noise, which

recommends measuring construction noise produced by all construction equipment simultaneously from the center of the project site. The distance to the nearest sensitive receptor from the center of the respective construction site as well as the anticipated short-term construction noise levels generated by equipment for each phase of construction is presented below.

School Closure/Consolidation Program

The construction activities at the three campuses would occur independently of each other and on different schedules as discussed in Section 3, *Project Description*. Construction noise would be isolated to each campus and its surrounding vicinity. The construction schedules for Argonaut HS and Ione Junior HS would overlap; however, these campuses are approximately 7.7 miles from each other, and construction noise at the two campuses would not combine. As discussed below, the proposed project would result in a **less than significant impact** to construction noise.

Argonaut High School Site Improvements

Argonaut HS is mainly surrounded by residential land uses and open space. The main noise-producing improvements include the construction of a 10-classroom, 2-story building; new parent drop-off location; and a new access road connecting the campus to Stony Creek Road. According to the Jackson Municipal Code Section 4.48.070, construction is prohibited between the hours of 8:00 p.m. and 7:00 a.m. on weekdays that are not holidays, between 7:00 p.m. and 8:00 a.m. on Saturdays, and between 5:00 p.m. and 9:00 a.m. on Sundays. The proposed project would adhere to these construction timing limitations. The nearest off-site noise-sensitive receptors to the proposed improvements are residences north of the project site fronting Westview Drive, with the closest being 400 feet from the project site center. The anticipated short-term construction noise levels generated for the necessary equipment for each phase of construction at Argonaut HS are presented in Table 5.11-11, *Construction Average (dBA) Noise Levels at Nearest Receptors: Argonaut High School.*

Table 5.11-11 Construction Average (dBA) Noise Levels at Nearest Receptors: Argonaut High School

Construction Phase	Estimated Exterior Construction Noise Level @ Closest Noise Sensitive Receptor (dBA Leq)	Construction Noise Standard (dBA Leq)	Exceed Standard?
Demolition	69.3	85	**No**
Site Preparation	66.5	85	**No**
Grading	67.8	85	**No**
Building Construction, Paving and Architectural Coating	69.1	85	**No**

Source: ECORP 2023.

As shown in Table 5.11-11, construction activities would not exceed the applicable noise standards. It is noted that construction noise was modeled on a worst-case basis. It is very unlikely that all pieces of construction equipment would be operating at the same time for the various phases of project construction as well as at the point closest to residences. A **less than significant** impact would occur.

Level of Significance Before Mitigation: Less than significant.

Ione Junior High School Site Improvements

The existing Ione Junior HS is mainly surrounded by residential land uses. The main noise-producing improvements at this campus include the construction of two new classroom buildings, an expanded parent drop-off, and new play structures and hardcourt areas. Per the Ione Municipal Code Section 9.16.040, construction is prohibited between the hours of 9:00 p.m. and 7:00 a.m. Monday through Thursday, and between 10:00 p.m. and 7:00 a.m. Friday through Sunday, or any time on federal or state holidays. The proposed project would adhere to these limitations. The nearest off-site noise-sensitive receptors to the proposed improvements are residences north of the project site fronting Mills Street, with the closest being 300 feet from the project site center. The anticipated short-term construction noise levels generated for the necessary equipment for each phase of construction at the existing Ione Junior HS are presented in Table 5.11-12, *Construction Average (dBA) Noise Levels at Nearest Receptors: Future Ione ES (Ione Junior HS)*.

Table 5.11-12 Construction Average (dBA) Noise Levels at Nearest Receptors: Future Ione ES (Ione Junior HS)

Construction Phase	Estimated Exterior Construction Noise Level @ Closest Noise Sensitive Receptor (dBA Leq)	Construction Noise Standard (dBA Leq)	Exceed Standard?
Demolition	70.9	85	**No**
Site Preparation	72.1	85	**No**
Grading	71.7	85	**No**
Building Construction, Paving and Architectural Coating	73.6	85	**No**

Source: ECORP 2023.

As shown in Table 5.11-12, construction activities would not exceed the applicable noise standards. It is noted that construction noise was modeled on a worst-case basis. It is very unlikely that all pieces of construction equipment would be operating at the same time for the various phases of project construction as well as at the point closest to residences. A **less than significant** impact would occur.

Level of Significance Before Mitigation: Less than significant.

Sutter Creek Elementary School Site Improvements

Sutter Creek ES is mainly surrounded by residential land uses as well as Amador HS. The main noise-producing improvements at this campus include the construction of a new classroom building and lunch shelter. Per the Sutter Creek Municipal Code Section 10.50.120, construction is prohibited between the hours of 7:00 p.m. and 7:00 a.m. The proposed project would adhere to these construction timing limitations. The nearest off-site noise-sensitive receptors to the proposed improvements are residences north of the project site fronting Sutter Ione Road, with the closest being 290 feet from the project site center. It is noted that Amador HS was not analyzed as a noise-sensitive receptor because it is an ACUSD campus and therefore is not considered a sensitive receptor for analysis. The anticipated short-term construction noise levels generated for the necessary equipment for each phase of construction at Sutter Creek ES are presented in Table 5.11-13, *Construction Average (dBA) Noise Levels at Nearest Receptors: Sutter Creek Elementary School.*

Table 5.11-13 Construction Average (dBA) Noise Levels at Nearest Receptors: Sutter Creek Elementary School

Construction Phase	Estimated Exterior Construction Noise Level @ Closest Noise Sensitive Receptor (dBA Leq)	Construction Noise Standard (dBA Leq)	Exceed Standard?
Demolition	71.2	85	**No**
Site Preparation	68.3	85	**No**
Grading	69.3	85	**No**
Building Construction, Paving and Architectural Coating	70.4	85	**No**

Source: ECORP 2023.

As shown in Table 5.11-13, construction activities would not exceed the applicable noise standards. It is noted that construction noise was modeled on a worst-case basis. It is very unlikely that all pieces of construction equipment would be operating at the same time for the various phases of project construction as well as at the point closest to residences. A **less than significant** impact would occur.

Level of Significance Before Mitigation: Less than significant.

Impact 5.11-2 Project implementation would result in long-term operation-related noise that would not exceed local standards. [Threshold N-1]

As previously described, noise-sensitive land uses are locations where people reside or where the presence of unwanted sound could adversely affect the use of the land. Residences, schools, hospitals, guest lodging, libraries, and some passive recreation areas would each be considered noise-sensitive and may warrant unique measures for protection from intruding noise.

School Closure/Consolidation Program

Operational On-site Noise

The proposed project includes the consolidation of eight schools, spanning three cities, onto six ACUSD campuses. The campuses are existing schools with three requiring physical improvements that would reconfigure certain campus features as well as all campuses altering noise-producing activity due to the transition of school grades (e.g., elementary school children vs. junior high students). On-site noise associated with school activity has been calculated using the SoundPLAN 3D noise model for each campus. Table 5.11-14 through Table 5.11-19 show the predicted project noise levels at the nearest noise-sensitive receptors in the areas surrounding the six ACUSD campuses. Additionally, a noise contour graphic for each campus (see Figure 5.11-2 through Figure 5.11-7) has been prepared to provide a visual depiction of the predicted noise levels in the project vicinity from project operations. The improvements/alterations proposed at each campus as well as the noise-producing sources accounted for are described in detail below. Activity was only accounted for during normal school hours (daytime). It is noted that noise-producing activities on the existing sports courts / athletic fields for after-school activities were not accounted for in the modeling because they would remain similar to current conditions.

Amador High School Campus

The existing Amador HS campus is proposed to accommodate the consolidation of two junior high schools, Ione Junior HS and Jackson Junior HS. No site improvements are being proposed. On-site noise has been calculated using the SoundPLAN 3D noise model. The modeling scenario accounts for the major noise-producing activity on the campus, such as school drop-off/pick up and lunch/recess. School drop-off/pick up was modeled as area sources encompassing the parking lot fronting Spanish Street, and school lunch/recess was modeled for the large open space areas on campus (see Figure 5.11-2, *Modeled Operational Noise Levels: Future Combined Ione and Jackson Junior HSs (Amador HS)*). It is noted that these noise-producing events were modeled in SoundPLAN as if occurring at the same time because of an overlap in assumed activity areas. Therefore, the modeled noise levels are expected to be less than what is shown in the figure. Receivers were placed in the back yards of the residences surrounding campus, consistent with Policy N-1.1.2 of the Sutter Creek General Plan. Table 5.11-14, *Modeled Operational Noise Levels: Future Combined Ione and Jackson Junior HSs (Amador HS)*, presents the predicted project noise levels at the nearest noise-sensitive receptors in the area surrounding the Amador HS campus, as predicted by SoundPLAN, and compared to the Sutter Creek exterior noise limits in the General Plan (see Table 5.11-3). A noise contour graphic (see Figure 5.11-2) has been prepared to provide a visual depiction of the predicted noise levels in the campus vicinity from proposed operations. As shown in Table 5.11-14, project operational noise would not exceed the exterior noise standard at any location in the area, and a **less than significant impact** would occur.

Table 5.11-14 Modeled Operational Noise Levels: Future Combined Ione and Jackson Junior HSs (Amador HS)

Location	Modeled Operational Noise Attributed to the Project (dBA Leq)	Exterior Noise Standard (dBA Leq)	Exceed Exterior Noise Standard
#1: Sutter Creek Elementary School	54.8	N/A [1]	**No**
#2: Residence east fronting Spanish Street	38.8	50	**No**
#3: Residence east fronting Spanish Street	35.4	50	**No**
#4: Residence east fronting Spanish Street	40.5	50	**No**
#5: Residence southwest fronting Oak Court	37.5	50	**No**

Source: ECORP 2023.
1. The City of Sutter Creek does not have exterior noise standards for educational land uses.

Future Combined Argonaut and Amador High Schools (Argonaut HS)

The existing Argonaut High School campus location is proposed to accommodate the consolidation of two high schools, Amador High School and Argonaut High School. Multiple site improvements are being proposed; however, the improvement that would impact noise sensitive receptors in the area surrounding the campus is the construction of a new parent drop-off/pick-up location. On-site noise has been calculated using the SoundPLAN 3D noise model. The modeling scenario accounts for the major noise producing activity on the campus such as school drop-off/pick up and passing periods/lunch. School drop-off/pick-up was modeled as multiple area sources with a large area source encompassing the existing parking lot adjacent to the tennis courts as well as an area source encompassing the new pavement on the northern end of the campus. Additionally, area sources were placed over the existing parking spaces for the parking lot on the northern end of the campus adjacent to the residences fronting Westview Drive (see Figure 5-11.3). Passing periods/lunch was modeled as

an area source encompassing the region where the main school buildings are located. It is noted that these noise producing events were modeled in SoundPLAN as occurring at the same time due to an overlap in assumed activity areas. As such, the modeled noise levels are expected to be less than what is presented. Table 5-11.15 presents the predicted noise levels at the nearest noise-sensitive receptors in the area surrounding the existing campus as well as the Amador County Superior Court located east across Argonaut Lane, as predicted by SoundPLAN. The City of Jackson 1987 General Plan Noise Element does not specifically establish noise standards for non-transportation noise sources. Therefore, project noise is evaluated against the 1987 General Plan Noise Element compatibility standard of 55 dBA at residential land uses. This is the most stringent noise threshold in the 1987 General Plan Noise Element Land Use Compatibility chart and is consistent with the City of Jackson General Plan Update 2040 stationary (non-transportation) noise source standards, which proposes to also limit sound from non-transportation noise sources at noise-sensitive residences to 55 dBA maximum. Additionally, a noise contour graphic (see Figure 5-11.3) has been prepared to provide a visual depiction of the predicted noise levels in the campus vicinity from proposed operations. As shown in Table 5.11-15, operational noise would not exceed the noise standard at any location in the area, and a **less than significant impact** would occur.

Table 5.11-15 Modeled Operational Noise Levels: Future Combined Argonaut HS and Amador HS (Argonaut HS)

Location	Modeled Operational Noise Attributed to the Project (dBA Leq)	Exterior Noise Standard (dBA Leq)	Exceed Exterior Noise Standard
#1: Residence north fronting Westview Drive	51.2	55	**No**
#2: Residence north fronting Westview Drive	48.9	55	**No**
#3: Residence north fronting Westview Drive	51.3	55	**No**
#4: Residence north fronting Westview Drive	49.7	55	**No**
#5: Residence north fronting Westview Drive	49.7	55	**No**
#6: Residence north fronting Westview Drive	48.6	55	**No**
#7: Residence north fronting Westview Drive	46.6	55	**No**
#8: Residence southwest fronting Stony Creek Road	40.6	55	**No**
#9: Amador County Superior Court	41.9	55	**No**

Source: ECORP 2023.

5. Environmental Analysis
NOISE

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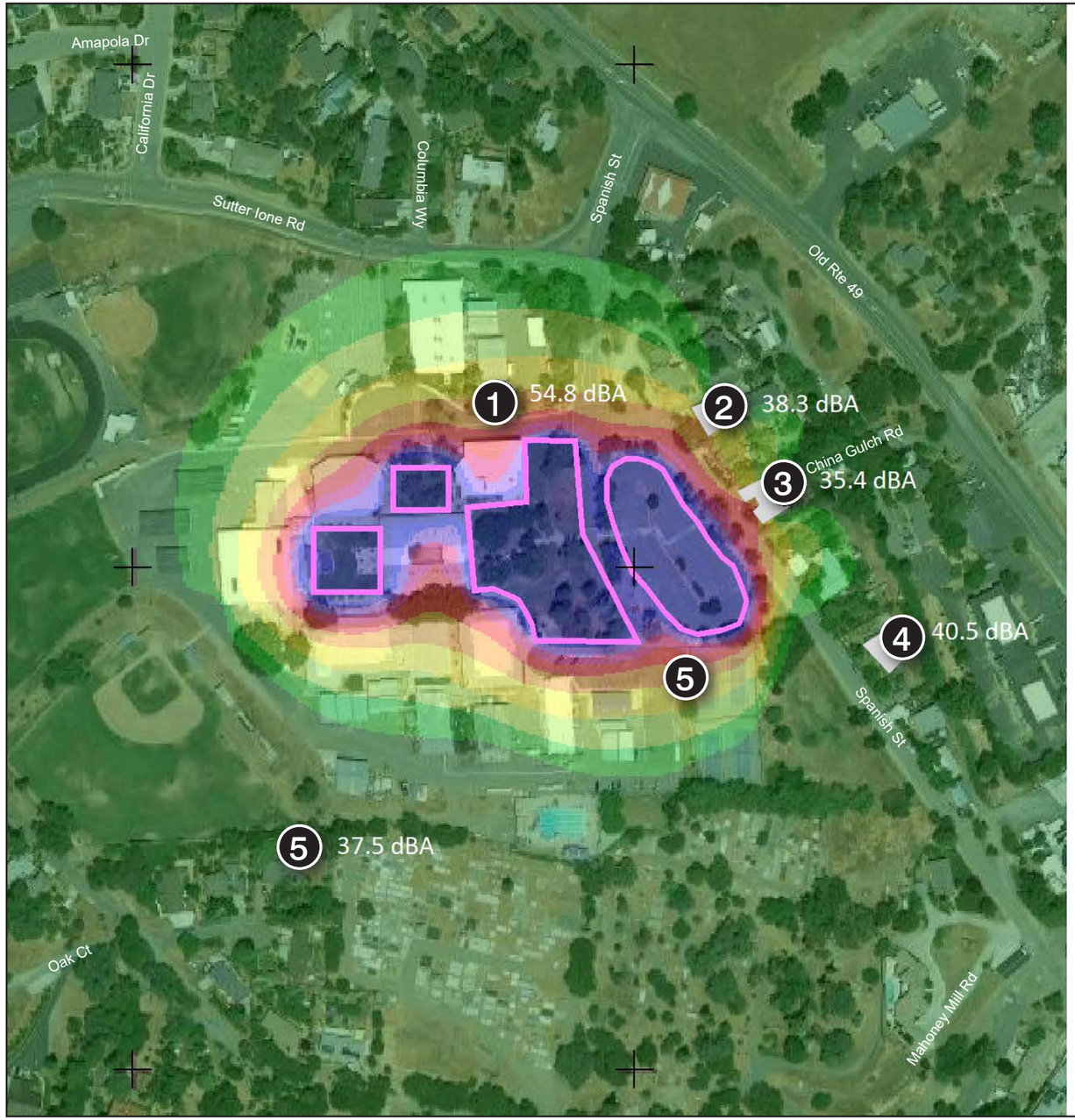
Figure 5.11-2 - Modeled Operational Noise Levels - Future Combined Ione & Jackson Junior High Schools (Existing Amador High School)



Project Noise
in dB(A)

- < 49
- 49 - 51
- 51 - 53
- 53 - 55
- 55 - 57
- 57 - 59
- 59 - 61
- 61 - 63
- 63 - 65
- >= 65

Area Sources:
- School Drop-Off/Pick-Up Activity
- Passing Periods/Lunch Activity

Receiver

0 250
Scale (Feet)

Source: ECORP Consulting, Inc 2023.

5. Environmental Analysis
NOISE

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Figure 5.11-3 - Modeled Operational Noise Levels - Future Combined Argonaut and Amador High Schools (Existing Argonaut High School)

Project Noise
in dB(A)

- < 49
- 49 - 51
- 51 - 53
- 53 - 55
- 55 - 57
- 57 - 59
- 59 - 61
- 61 - 63
- 63 - 65
- >= 65

Area Sources:
- School Drop-Off/Pick-Up Activity
- Passing Periods/Lunch Activity

Receiver

Proposed Building

0 255
Scale (Feet)

Source: ECORP Consulting, Inc 2023.

5. Environmental Analysis
NOISE

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Future Ione Elementary School (at current Ione Junior HS campus)

The existing Ione Junior HS is proposed to accommodate the transition from a junior high school to a preschool and TK through sixth-grade. Multiple site improvements are being proposed, but the improvements that would impact noise-sensitive receptors in the area surrounding the campus are the expansion of drop-off/pick up areas as well as new play structures and hardcourt areas. On-site noise has been calculated using the SoundPLAN 3D noise model. The modeling scenario accounts for the major noise producing activity on the campus such as school drop-off/pick up and lunch/recess. School drop-off/pick up was modeled as area sources encompassing the student drop-off/ parking lot on South Mills Street as well as the proposed kindergarten drop-off area along the eastern boundary of the campus. School lunch/recess was modeled as area sources encompassing the two large playground areas. It is noted that these noise-producing events were modeled in SoundPLAN as occurring at the same time due to an overlap in assumed activity areas. As such, the modeled noise levels are expected to be less than what is presented. Table 5.11-16, *Modeled Operational Noise Levels: Future Ione ES (Ione Junior HS)*, presents the predicted noise levels at the nearest noise-sensitive receptors in the area surrounding the existing campus, as predicted by SoundPLAN, and compared to the City of Ione non-transportation exterior noise standards in the General Plan (see Table 5.11-5). Additionally, a noise contour graphic (see Figure 5.11-4) has been prepared to provide a visual depiction of the predicted noise levels in the campus vicinity from proposed operations. As shown in Table 5.11-16, operational noise would not exceed the exterior noise standard at any location in the area, and a **less than significant impact** would occur.

Table 5.11-16 Modeled Operational Noise Levels: Future Ione ES (Ione Junior HS)

Location	Modeled Operational Noise Attributed to the Project (dBA Leq)	Exterior Noise Standard (dBA Leq)	Exceed Exterior Noise Standard
#1: Residence north fronting Sacramento Street	44.2	55	**No**
#2: Residence north fronting Sacramento Street	48.0	55	**No**
#3: Residence north fronting South Mills Street	51.9	55	**No**
#4: Residence north fronting Marlette Street	49.5	55	**No**
#5: Residence north fronting Marlette Street	51.1	55	**No**
#6: Residence north fronting Marlette Street	48.2	55	**No**
#7: Residence north fronting Marlette Street	43.0	55	**No**
#8: Residence north fronting Marlette Street	42.7	55	**No**
#9: Residence south fronting State Route 124	37.0	55	**No**

Source: ECORP 2023.

Future Preschool Center (at current Jackson Junior HS campus)

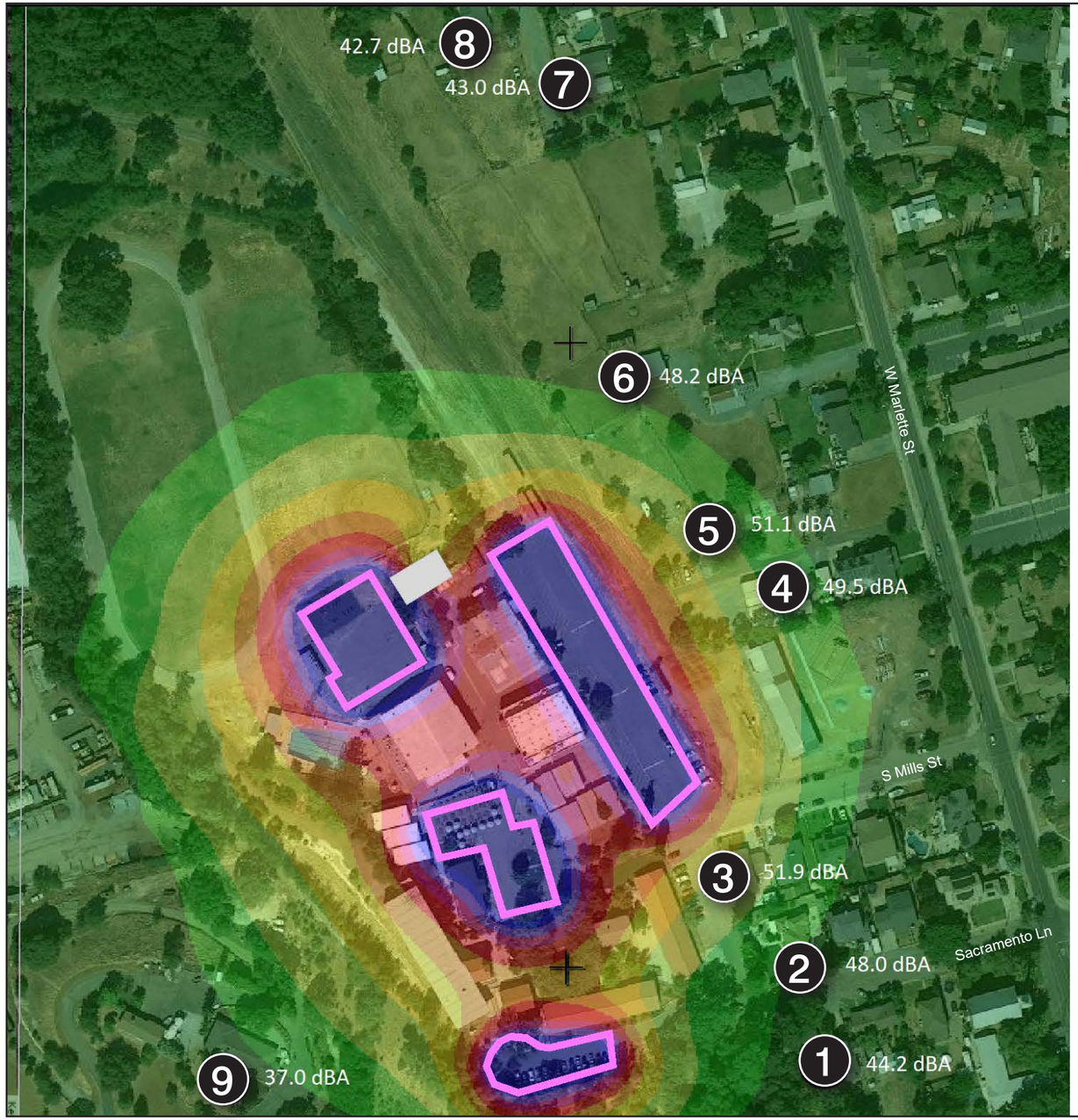
The existing Jackson Junior High School campus location is proposed to accommodate the transition from a junior high school to a preschool center. Improvements consist of converting restrooms and fountains with age-appropriate fixtures. On-site noise has been calculated using the SoundPLAN 3D noise model. The modeling scenario accounts for the major noise producing activity on the campus, such as school drop-off/pick up and lunch/recess. School drop-off/ pick up was modeled as an area sources encompassing the horseshoe shaped driveway on the campus. School lunch/ recess was modeled as an area source encompassing the large area west of the main school building. It is noted that these noise producing events were modeled in SoundPLAN as occurring at the same time due to an overlap in assumed activity areas. As such, the modeled noise levels are expected to be less than what is presented. 5.11-17 presents the predicted noise levels at the nearest noise-sensitive receptors in the area surrounding the existing campus, as predicted by SoundPLAN. As previously described, the City of Jackson 1987 General Plan Noise Element does not specifically establish noise standards for non-transportation noise sources. Therefore, project noise is evaluated against the 1987 General Plan Noise Element compatibility standard of 55 dBA at residential land uses. This is the most stringent noise threshold in the 1987 General Plan Noise Element Land Use Compatibility chart and is consistent with the City of Jackson General Plan Update 2040 stationary (non-transportation) noise source standards, which proposes to also limit sound from nontransportation noise sources at noise-sensitive residences to 55 dBA maximum. Additionally, a noise contour graphic (see Figure 5.11-4) has been prepared to provide a visual depiction of the predicted noise levels in the campus vicinity from proposed operations. As shown in Table 5-11-17, operational noise would not exceed the noise standard at any location in the area, and a **less than significant impact** would occur.

Table 5.11-17 Modeled Operational Noise Levels: Future Preschool Center (Jackson Junior HS)

Location	Modeled Operational Noise Attributed to the Project (dBA Leq)	Exterior Noise Standard (dBA Leq)	Exceed Exterior Noise Standard
#1: Residence north fronting Vogan Toll Road	42.2	55	**No**
#2: Pure Metal Works north fronting Sutter Street	37.4	70	**No**
#3: Amador County Special Education Center east	46.6	55	**No**
#4: Residence east fronting Rex Avenue	50.4	55	**No**
#5: Residence east fronting Hoffman Street	51.9	55	**No**
#6: Residence south fronting Hoffman Street	45.7	55	**No**
#7: Residence south fronting Hoffman Street	49.2	55	**No**
#8: Residence south fronting Hoffman Street	48.7	55	**No**
#9: Residence south fronting Hoffman Street	47.8	55	**No**
#10: Residence west adjacent to undeveloped land	44.8	55	**No**
#11: Residence west adjacent to undeveloped land	45.8	55	**No**

Source: ECORP 2023.

Figure 5.11-4 - Modeled Operational Noise Levels - Future Ione Elementary School (Existing Ione Junior High School)



Project Noise
in dB(A)

- < 49
- 49 - 51
- 51 - 53
- 53 - 55
- 55 - 57
- 57 - 59
- 59 - 61
- 61 - 63
- 63 - 65
- >= 65

Area Sources:
- School Drop-Off/Pick-Up Activity
- Lunch/Recess Activity

Proposed Building

Bodeneffekte

Noise Calculation Area

Receiver

0 200
Scale (Feet)

Source: ECORP Consulting, Inc 2023.

5. Environmental Analysis
NOISE

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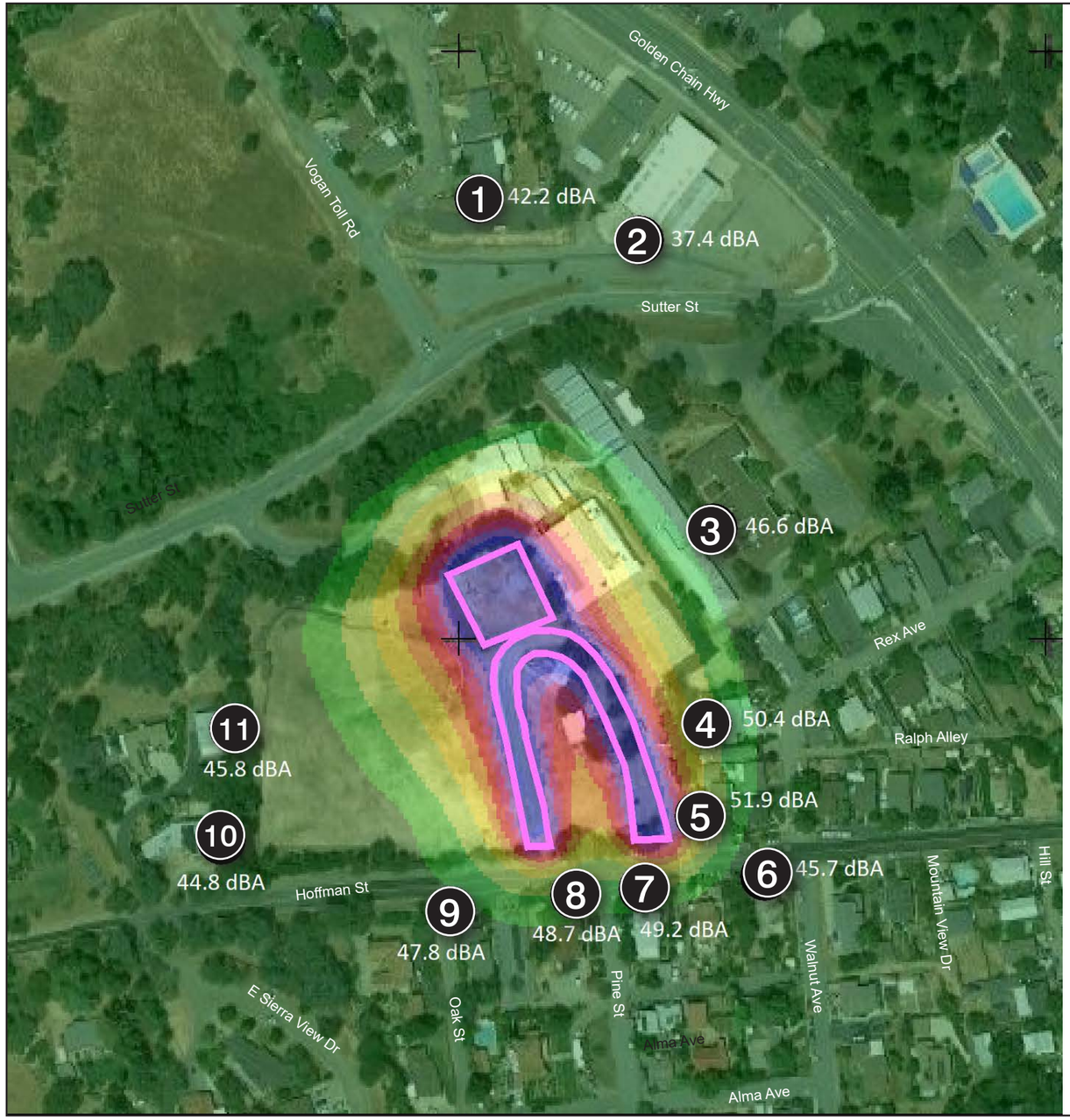
Figure 5.11-5 - Modeled Operational Noise Levels - Future Preschool Center (Existing Jackson Junior High School)



Project Noise
in dB(A)

- < 49
- 49 - 51
- 51 - 53
- 53 - 55
- 55 - 57
- 57 - 59
- 59 - 61
- 61 - 63
- 63 - 65
- >= 65

Area Sources:
- School Drop-Off/Pick-Up Activity
- Lunch/Recess Activity

Receiver

0 200
Scale (Feet)

Source: ECORP Consulting, Inc 2023.

5. Environmental Analysis
NOISE

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Future Expanded Jackson Elementary School

The existing Jackson Elementary School campus location is proposed to accommodate the expansion of operations to include sixth grade students. No site improvements are being proposed. On-site noise has been calculated using the SoundPLAN 3D noise model. The modeling scenario accounts for the major noise producing activity on the existing campus, such as school drop-off/ pick up and lunch/ recess. School dropoff/pick up activity was modeled as an area source encompassing the drop-off/ pick up lane fronting Church Street. School lunch/ recess was modeled as area sources enveloping the hard-court area on the north end of the campus. It is noted that these noise producing events were modeled in SoundPLAN as occurring at the same time due to an overlap in assumed activity areas. As such, the modeled noise levels are expected to be less than what is presented. Table 5.11-18 presents the predicted noise levels at the nearest noise-sensitive receptors in the area surrounding the existing campus, as predicted by SoundPLAN. As previously described, the City of Jackson 1987 General Plan Noise Element does not specifically establish noise standards for non-transportation noise sources. Therefore, Project noise is evaluated against the 1987 General Plan Noise Element compatibility standard of 55 dBA at residential land uses. This is the most stringent noise threshold in the 1987 General Plan Noise Element Land Use Compatibility chart and is consistent with the City of Jackson General Plan Update 2040 stationary (non-transportation) noise source standards, which proposes to also limit sound from non-transportation noise sources at noise-sensitive residences to 55 dBA maximum. Additionally, a noise contour graphic (see Figure 5.11-6) has been prepared to provide a visual depiction of the predicted noise levels in the campus vicinity from proposed operations. As shown in Table 5.11-18, operational noise would not exceed the exterior noise standard at any location in the area, and a **less than significant impact** would occur.

Table 5.11-18 Modeled Operational Noise Levels: Future Expanded Jackson ES

Location	Modeled Operational Noise Attributed to the Project (dBA Leq)	Exterior Noise Standard (dBA Leq)	Exceed Exterior Noise Standard
#1: Residence northwest fronting Church Street	49.6	55	**No**
#2: Residence west fronting Church Street	52.8	55	**No**
#3: Residence west fronting Church Street	54.4	55	**No**
#4: Residence southwest fronting Church Street	49.7	55	**No**
#5: Residence south fronting Court Street	39.7	55	**No**
#6: Residence south fronting Court Street	38.6	55	**No**
#7: Residence south fronting Court Street	38.9	55	**No**
#8: Residence south fronting Court Street	38.9	55	**No**
#9 Residence east fronting Court Street	41.4	55	**No**
#10: Residence northeast fronting Placer Drive	39.3	55	**No**

Source: ECORP 2023.

Future Expanded Sutter Creek Elementary School

The existing Sutter Creek ES campus location is proposed to accommodate the expansion of operations to include transitional kindergarten through 6th-grade students. The proposed project includes the construction of 12 new classrooms within a new building and a lunch shelter. On-site noise has been calculated using the SoundPLAN 3D noise model. The modeling scenario accounts for the major noise producing activity on the

campus such as school drop-off/pick up and lunch/recess. School drop-off/pick up activity was modeled as an area source encompassing the drop-off/pick up lane and parking lot adjacent to Amador HS. School lunch/recess was modeled as an area source enveloping the hardcourt area adjacent to the main school building. It is noted that these noise-producing events were modeled as occurring at the same time due to an overlap in assumed activity areas. As such, the modeled noise levels are expected to be less than what is presented. Receivers were placed in the backyards of the residences surrounding campus, consistent with Policy N-1.1.2 of the Sutter Creek General Plan. Table 5.11-19, *Modeled Operational Noise Levels: Future Expanded Sutter Creek Elementary School*, presents the predicted project noise levels at the nearest noise-sensitive receptors in the area surrounding the campus, as predicted by SoundPLAN, and compared to the Sutter Creek exterior noise limits in the General Plan (see Table 5.11-3). Additionally, a noise contour graphic (see Figure 5.11-7, *Modeled Operational Noise Levels: Future Expanded Sutter Creek Elementary School*), has been prepared to provide a visual depiction of the predicted noise levels in the vicinity from proposed operations. As shown in Table 5.11-19, operational noise would not exceed the exterior noise standard at any noise-sensitive receptors in the area, and a **less than significant impact** would occur.

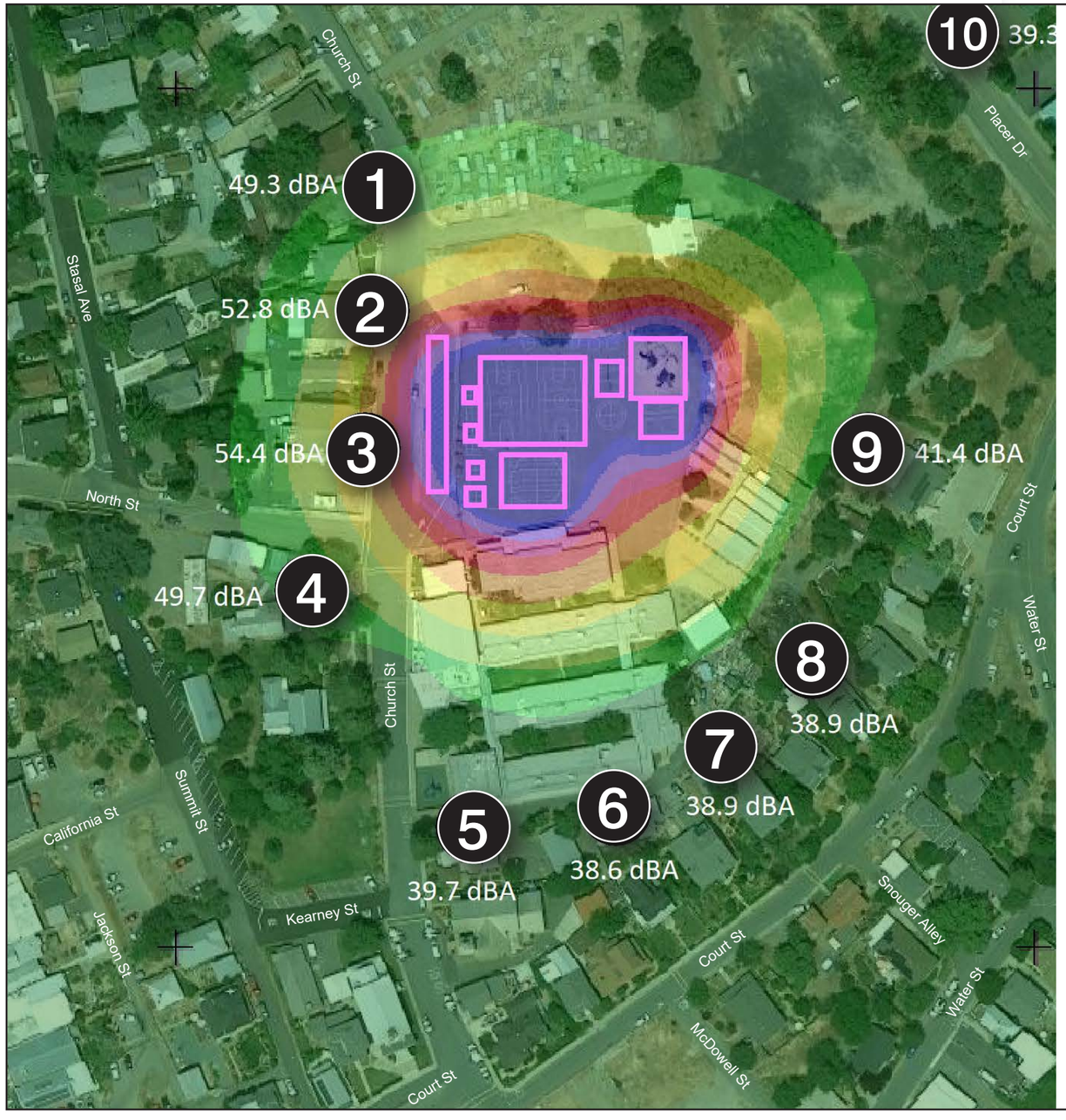
Table 5.11-19 Modeled Operational Noise Levels: Future Expanded Sutter Creek Elementary School

Location	Modeled Operational Noise Attributed to the Project (dBA Leq)	Exterior Noise Standard (dBA Leq)	Exceed Exterior Noise Standard
#1: Residence northwest fronting Sutter Ione Road	32.9	50	**No**
#2: Residence northwest fronting Sutter Ione Road	33.9	50	**No**
#3: Residence northwest fronting Sutter Ione Road	30.0	50	**No**
#4: Residence southeast fronting Spanish Street	39.1	50	**No**
#5: Residence southeast fronting Spanish Street	26.1	50	**No**
#6: Residence southeast fronting Spanish Street	31.4	50	**No**
#7: Amador High School	53.8	N/A[1]	**No**

Source: ECORP 2023
Notes:
[1]The City of Sutter Creek does not have exterior noise standards for educational land uses.

Level of Significance Before Mitigation: Less than significant.

Figure 5.11-6 - Modeled Operational Noise Levels - Future Expanded Jackson Elementary School (Existing Jackson Elementary School)



Project Noise
in dB(A)

- < 49
- 49 - 51
- 51 - 53
- 53 - 55
- 55 - 57
- 57 - 59
- 59 - 61
- 61 - 63
- 63 - 65
- >= 65

Area Sources:
- School Drop-Off/Pick-Up Activity
- Passing Periods/Lunch Activity

Receiver

0 130
Scale (Feet)

Source: ECORP Consulting, Inc 2023.

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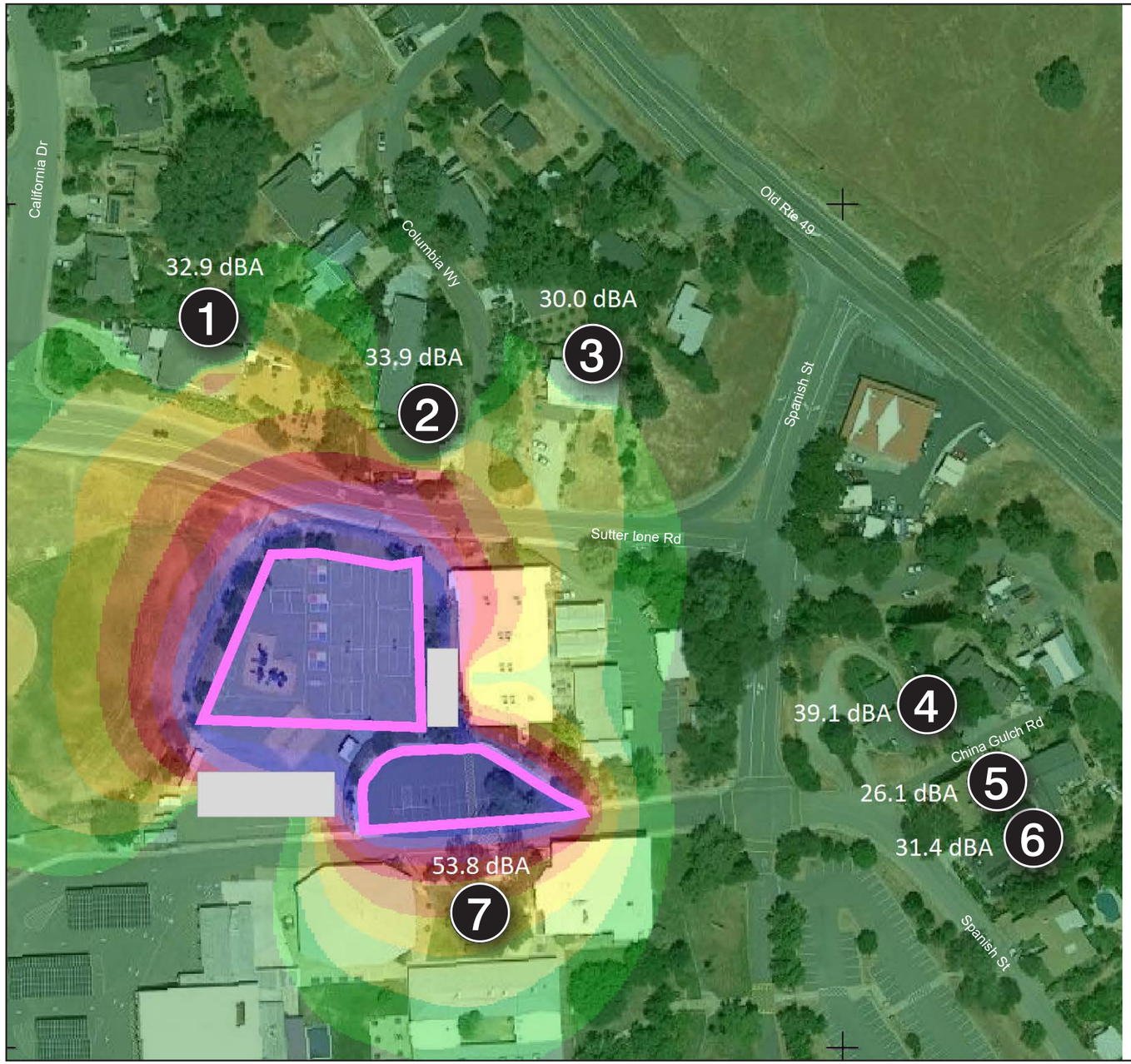
Figure 5.11-7 - Modeled Operational Noise Levels - Future Expanded Sutter Creek Elementary School (Existing Sutter Creek Elementary School)



Project Noise
in dB(A)

- < 49
- 49 - 51
- 51 - 53
- 53 - 55
- 55 - 57
- 57 - 59
- 59 - 61
- 61 - 63
- 63 - 65
- >= 65

Area Sources:
- School Drop-Off/Pick-Up Activity
- Lunch/Recess Activity

(#) Receiver

0 130
Scale (Feet)

Source: ECORP Consulting, Inc 2023.

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Operational Off-Site Traffic Noise

Future traffic noise levels as a result of the proposed project were modeled based on the proposed project's traffic volumes to determine the noise levels along project vicinity roadways. Table 5.11-20, *Existing Plus Project Predicted Traffic Noise Levels,* shows the calculated offsite roadway noise levels under existing traffic levels compared to future build-out of the Project. The thresholds recommended by FICON will be used in this analysis as the analyzed roadways span multiple municipalities within the County. It is noted that the FICON thresholds of significance are the same as the City of Jackson's transportation-related noise thresholds of significance, as proposed by Jackson General Plan Update 2040 Policy N 1.6. Neither the City of Sutter Creek General Plan, City of Jackson 1987 General Plan Noise Element, or City of Ione General specifically promulgate transportation-related noise standards. FICON's measure of substantial increase for transportation noise exposure follows.

- If the existing ambient noise levels at existing noise-sensitive land uses (e.g., residential,) are less than 60 dBA Ldn and the project creates a readily perceptible 5 dBA Ldn or greater project-related noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or
- If the existing noise levels range from 60 to 65 dBA Ldn and the project creates a barely perceptible 3 dBA Ldn or greater project-related noise level increase and the resulting noise level would exceed acceptable exterior noise standards; or
- If the existing noise levels already exceed 65 dBA Ldn, and the project creates a community noise level increase of greater than 1.5 dBA Ldn.

Table 5.11-20 Existing Plus Project Predicted Traffic Noise Levels

Roadway Segment	Surrounding Uses	Ldn at 100 feet from Centerline of Roadway			Standard	Exceed Standard
		Existing	Existing + Project	Net Change		
State Route 88 West of Argonaut Lane	Residential and Commercial	65.9	66.0	0.1	>1.5	**No**
State Route 88 Between Argonaut Lane and Hoffman Street	Residential	66.0	66.1	0.1	>1.5	**No**
State Route 88 South of Hoffman Street	Residential and Commercial	66.5	66.6	0.1	>1.5	**No**
Argonaut Lane Between CA 88 and Westview Drive	Residential	53.0	55.2	2.2	>5.0	**No**
Argonaut Lane Between Westview Dive and Stony Creek Road	Residential and Educational	54.4	58.1	3.7	>5.0	**No**
Hoffman Street/ Stony Creek Road West of Argonaut Lane	Residential and Educational	52.2	56.5	4.3	>5.0	**No**
Hoffman Street/ Stony Creek Road Between Argonaut Lane and CA 88	Residential	51.2	56.1	4.9	>5.0	**No**
Church Street North of Market Street	Residential	60.2	60.9	0.7	>3.0	**No**
Church Street Between Market Street and Relihan Drive	Residential	60.2	60.3	0.1	>3.0	**No**
Church Street South of Relihan Drive	Residential	60.0	60.9	0.9	>3.0	**No**

Table 5.11-20 Existing Plus Project Predicted Traffic Noise Levels

Roadway Segment	Surrounding Uses	Ldn at 100 feet from Centerline of Roadway			Standard	Exceed Standard
		Existing	Existing + Project	Net Change		
Market Street West of Church Street	Residential	51.0	54.2	3.2	>5.0	**No**
Market Street East of Church Street	Residential	53.8	56.6	2.8	>5.0	**No**
Relihan Drive West of Church	Residential	45.9	47.5	1.6	>5.0	**No**
Marlette Street West of Mills Street	Residential	53.0	53.3	0.3	>5.0	**No**
Marlette Street Between Mills Street and Sacramento Street	Residential	54.4	54.0	-0.4	>5.0	**No**
Marlette Street East of Church Street	Residential	50.2	52.1	1.9	>5.0	**No**
Mills Street North of Marlette Street	Residential	41.7	45.8	4.1	>5.0	**No**
Mills Street South of Marlette Street	Residential	47.0	52.0	5.0	>5.0	**No**
Sacramento Street North of Marlette Street	Residential	51.1	52.9	1.8	>5.0	**No**
Sacramento Street South of Marlette Street	Residential	46.1	46.6	0.5	>5.0	**No**

Source: ECORP 2023.

As shown in Table 5.11-20, no roadway segment would experience an increase of noise beyond the FICON significance standards as a result of the project. The proposed project would result in a **less than significant impact** to traffic noise.

Argonaut High School

While the proposed project would increase student enrollment capacity at Argonaut HS, as discussed above, the proposed project would result in a less than significant impact at Argonaut HS for both onsite operation noise and traffic noise.

Ione Junior High School

While the proposed project would increase student enrollment capacity at Ione Junior HS, as discussed above, the proposed project would result in a **less than significant impact** at Ione Junior HS for both onsite operation noise and traffic noise.

Sutter Creek Elementary School

As a result of the proposed project, the estimated enrollment at Sutter Creek Elementary School is anticipated to increase from 204 students to 625 students, an increase of 421 students who would largely arrive and depart school via personal automobile trips. Approximately 8.8 percent of Sutter Creek Elementary School students arrive and depart via school bus. Therefore, it can be expected that approximately 37 of the new 421 students would arrive and depart via school bus, resulting in approximately 384 students arriving and departing via personal automobile trips. 384 students arriving and departing via personal automobile trips would equate to 768 new traffic trips daily as a result of the proposed project. The majority of these trips would arrive and depart Sutter Creek Elementary School via Old Route 49 and Sutter Ione Road before dispersing into the regional transportation network. Old Route 49 is classified as a Main Arterial roadway in the Sutter Creek

General Plan while Sutter Ione Road and the majority of other roadways in the vicinity are classified as Local/Residential roadways.

According to the Caltrans Technical Noise Supplement to the Traffic Noise Analysis Protocol, a doubling of traffic on a roadway is required to result in an increase of 3 dB (outside of the laboratory, a 3-dBA change is considered a just-perceivable difference). Main Arterial roadways, such as Old Route 49, generally accommodate between 10,000 to 25,000 vehicles daily and Local/Residential roadways, such as Sutter Ione Road and the majority of other roadways in the vicinity of Sutter Creek Elementary School generally accommodate between 1,500 vehicles daily. Thus, the proposed project would not result in a doubling of traffic on the local transportation network in Sutter Creek, and therefore its contribution to existing traffic noise would not be perceptible. A **less than significant impact** would occur.

Level of Significance Before Mitigation: Less than significant.

Impact 5.11-3: The project would not create excessive short- or long-term groundborne vibration and groundborne noise. [Threshold N-2]

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

Construction-related ground vibration is normally associated with impact equipment such as pile drivers and jackhammers and heavy-duty construction equipment such as dozers and trucks. Vibration decreases rapidly with distance, and construction activities would occur throughout the project sites and would not be concentrated at the point closest to sensitive receptors. Groundborne vibration levels associated with construction equipment are summarized in Table 5.11-21, *Representative Vibration Source Levels for Construction Equipment*.

Table 5.11-21 Representative Vibration Source Levels for Construction Equipment

Equipment Type	Peak Particle Velocity at 25 Feet (inches per second)
Large Bulldozer	0.089
Pile Driver	0.170
Loaded Trucks	0.076
Hoe Ram	0.089
Jackhammer	0.035
Small Bulldozer/Tractor	0.003
Vibratory Roller	0.210

Source: ECORP 2023.

As previously stated, the project would require physical site improvements at three campuses: Argonaut HS campus, Ione Junior HS campus, and Sutter Creek ES campus. These campuses are in the City of Jackson, the City of Ione, and the City of Sutter Creek, respectively. Neither these jurisdictions nor the County regulate or have a numeric threshold for construction vibrations. However, a discussion of construction vibration is included for full disclosure purposes. For comparison purposes, the Caltrans-recommended standard of 0.3 inches per second PPV with respect to the prevention of structural damage for older residential buildings is used as a threshold. This is also the level at which vibrations may begin to annoy people in buildings.

Based on the representative vibration levels for various construction equipment types in Table 5.11-21 and the construction vibration assessment methodology published by the FTA, it is possible to estimate the potential project construction vibration levels. The FTA provides the following equation:

[PPVequip = PPVref x (25/D)1.5]

Tables 5.11-22, -23, and -24 present the expected vibration levels at the nearest land uses to the three campuses where physical site improvements are proposed. Consistent with FTA recommendations for calculating construction vibration, construction vibration was measured from the center of the project site.

School Closure/Consolidation Program

The proposed project includes the construction of site improvements at three campuses to accommodate the increase in enrollment at these campuses. The construction activities at the three campuses would occur independently of each other and on different schedules as discussed in Section 3, *Project Description*. Vibration produced during construction would be isolated to each campus. The construction schedules for Argonaut HS and Ione Junior HS would overlap; however, these campuses are approximately 7.7 miles from each other, and construction vibration at the two campuses would not combine. As discussed below, the proposed project would result in a **less than significant impact** to construction vibration.

Argonaut High School Site Improvements

The nearest structure of concern to the proposed improvements are residences north of the campus, fronting Westview Drive, with the closest being 400 feet from the campus center. As shown in Table 5.11-22, vibration as a result of construction activities at Argonaut HS would not exceed 0.3 PPV at the nearest structure. Thus, on-site construction would not exceed the threshold, and **less than significant impact** would occur.

Table 5.11-22 Construction Vibration Levels at 400 Feet

Receiver PPV Levels (in/sec)[1]					Peak Vibration	Threshold	Exceed Threshold?
Large Bulldozer, Caisson Drilling, and Hoe Ram	Loaded Trucks	Jackhammer	Pile Driver	Vibratory Roller			
0.0013	0.0011	0.0005	0.0026	0.0032	0.0032	0.3	**No**

Source: ECORP 2023.
[1]Based on the Vibration Source Levels of Construction Equipment included in Table 5.11-21. Distance to the nearest structure of concern is approximately 400 feet measured from proposed improvements on

Ione Junior High School Site Improvements

The nearest structure of concern to the proposed improvements at Ione Junior HS are residences to the north of the project site, fronting Mills Street, with the closest being 300 feet from the campus center. As shown in Table 5.11-23, vibration as a result of construction activities on the existing Ione Junior HS campus would not exceed 0.3 PPV at the nearest structure. Thus, on-site construction would not exceed the threshold, and **less than significant impact** would occur.

Table 5.11-23 Construction Vibration Levels at 300 Feet

Receiver PPV Levels (in/sec)[1]					Peak Vibration	Threshold	Exceed Threshold?
Large Bulldozer, Caisson Drilling, and Hoe Ram	Loaded Trucks	Jackhammer	Pile Driver	Vibratory Roller			
0.0021	0.0018	0.0008	0.0040	0.0050	0.0050	0.3	**No**

Source: ECORP 2023.
[1]Based on the Vibration Source Levels of Construction Equipment included on Table 5.11-21. Distance to the nearest structure of concern is approximately 300 feet measured from proposed improvements on campus.

Sutter Creek Elementary School Site Improvements

The nearest structure of concern to the proposed improvements are residences to the north of the campus, fronting Sutter Ione Road, with the closest being 290 feet from the campus center. As shown in Table 5.11-24, vibration as a result of construction activities on the campus would not exceed 0.3 PPV at the nearest structure. Thus, on-site construction would not exceed the threshold, and **less than significant impact** would occur.

Table 5.11-24 Construction Vibration Levels at 290 Feet

Receiver PPV Levels (in/sec)[1]					Peak Vibration	Threshold	Exceed Threshold?
Large Bulldozer, Caisson Drilling, and Hoe Ram	Loaded Trucks	Jackhammer	Pile Driver	Vibratory Roller			
0.0025	0.0019	0.0008	0.0043	0.0053	0.0053	0.3	**No**

Source: ECORP 2023.
[1]Based on the Vibration Source Levels of Construction Equipment included on Table 5.11-21. Distance to the nearest structure of concern is approximately 300 feet measured from proposed improvements on campus.

Level of Significance Before Mitigation: Less than significant.

Impact 5.11-4: The proximity of the project site to an airport or airstrip would not result in exposure of future resident and/or workers to airport-related noise. [Threshold N-3]

School Closure/Consolidation Program

The proposed project would maintain or reduce student enrollment capacity at three campuses (Amador HS, Jackson Junior HS, and Jackson ES) and would increase student enrollment capacity at three campuses

(Argonaut HS, Ione Junior HS, and Sutter Creek Elementary). Construction would occur at the three campuses with increase in enrollment capacity. The proposed project is a school consolidation project occurring on existing school campuses. As discussed below, the proposed project would not expose people residing or working in the project area to excessive noise levels from a public or private airstrip or airport. A **less than significant impact** would occur.

Amador High School

The nearest airport to the Amador HS campus is the Amador County Airport, 1.73 miles southeast. According to Figure N-4 of the Amador County General Plan, the campus is outside of the 65 dBA CNEL noise contours for the Amador County Airport. Implementation of the proposed project would not affect airport operations or result in increased exposure of people on this campus to aircraft noise. A **less than significant impact** would occur.

Argonaut High School

The nearest airport to the Argonaut HS campus is the Amador County Airport, 1.21 miles north. According to Figure N-4 of the Amador County General Plan, the campus is outside of the 65 dBA CNEL noise contours for the airport. Implementation of the proposed project would not affect airport operations or result in increased exposure of people on this campus to aircraft noise. A **less than significant impact** would occur.

Ione Junior High School

The nearest airport to the Ione Junior HS campus is the Camanche Skypark Airport, 5.88 miles south. The campus is not in an airport land use plan or within two miles of a public airport or public use airport. Implementation of the proposed project would not affect airport operations or result in increased exposure of people working at or visiting this campus to aircraft noise. A **less than significant impact** would occur.

Jackson Junior High School

The nearest airport to the existing Jackson Junior HS campus is the Amador County Airport, 1.62 miles northwest. According to Figure N-4 of the Amador County General Plan, the campus is located outside of the 65 dBA CNEL noise contours for the airport. Implementation of the proposed project would not affect airport operations nor result in increased exposure of people at this campus to aircraft noise. A **less than significant impact** would occur.

Jackson Elementary School

The nearest airport to Jackson ES is Amador County Airport, 2.01 miles to the northwest. Figure N-4 of the Amador County General Plan shows the campus outside of the 65 dBA CNEL noise contours for the airport. Implementation of the proposed project would not affect airport operations or result in increased exposure of people at this campus to aircraft noise. A **less than significant impact** would occur.

Sutter Creek Elementary School

Sutter Creek ES is 1.72 miles southeast of the Amador County Airport. Figure N-4 of the Amador County General Plan shows the campus outside of the 65 dBA CNEL noise contours for the airport. Implementation of the proposed project would not affect airport operations or result in increased exposure of people at this campus to aircraft noise. A **less than significant impact** would occur.

Argonaut High School, Ione Junior High School, and Sutter Creek Elementary School

While the proposed project would increase student enrollment capacity at Argonaut HS, Ione Junior HS, and Sutter Creek ES, as discussed above, the Argonaut HS and Sutter Creek ES campuses are outside of the 65 dBA CNEL noise contours for the Amador County Airport (the nearest airport to these campuses) and Ione Junior HS is 5.88 miles from the closest airport. The increase in student enrollment at these three campuses would not expose students to excessive noise levels from a public or private airstrip or airport A **less than significant** impact would occur.

Level of Significance Before Mitigation: Less than significant.

5.11.4 Mitigation Measures

No mitigation required.

5.11.5 Level of Significance After Mitigation

No mitigation measures are required, and the impacts are less than significant.

5.11.6 Cumulative Impacts

Construction

Construction noise impacts typically impact sensitive receptors within 500 feet of a project, and construction vibration impacts only impact sensitive receptors within 100 feet of a project. The three cumulative projects were identified near the Argonaut HS and Sutter Creek ES (see Section 4, *Environmental Setting*). The first cumulative project, Wicklow Way Specific Plan, had its notice of preparation released in January 2023 and a draft EIR is currently being prepared. Future development within the specific plan area would be required to be consistent with the specific plan. Since the construction at Argonaut HS would be complete by June 2025 and given the status of the Wicklow Way Specific Plan project, it is unlikely that construction within the Wicklow Way Specific Plan area would overlap with site improvements at Argonaut HS. Construction of the Sutter Creek Extension project would begin in 2025 (Jackson 2022); therefore, it is possible that the construction of Sutter Creek Extension project could overlap with the construction of the improvements at Argonaut HS. However, the distance between Argonaut HS and the Sutter Creek Extension project area is more than 500 feet, and therefore, construction noise nor vibration would combine to create a cumulative noise or vibration impact. Similarly, the Campbell Vesting Tentative Parcel Map project is more than 500 feet away of Sutter Creek ES. At these distances, construction of the two cumulative projects would not contribute significantly to construction noise from the project site. Further, the construction of future projects would be

required to comply with each jurisdiction's noise ordinance and implement mitigation measures to reduce noise impacts if needed. Therefore, the proposed project combined with future development would not create a cumulative construction noise and vibration impacts. Impacts would be ***less than significant***.

Operation

As shown in Table 5.11-20, implementation of the proposed project would contribute to an increase in traffic noise levels along most roadways (and decrease or maintain traffic noise levels along two roadways). The buildout of the Wicklow Way Specific Plan project and each future project would need to evaluate its own contribution to noise and provide mitigation if it results in a threshold exceedance along the local roadways. As shown in Table 5.11-20, the proposed project would not exceed applicable noise thresholds for its contribution to traffic along roadways. However, given the proposed project's contribution to traffic noise along roadways near the schools with enrollment increases (such as Argonaut HS, e.g., Hoffman Street/Stony Creek Road West of Argonaut and Hoffman Street/Stony Creek Road between Argonaut Lane and CA 88), the proposed project would be expected to combine with the buildout of the Wicklow Way Specific Plan and future development projects to generate a cumulative operational traffic noise impact.

Vehicles associated with the proposed project, Wicklow Way Specific Plan, and future development in Jackson and Ione on public rights of way would be required to adhere to local noise ordinances which would limit vehicle noise along public rights of way. Further, the proposed project would implement Mitigation Measure T-1, which would include the preparation of a transportation demand management plan that would encourage alternatives to single-occupancy vehicles. Nevertheless, the noise generated from the cumulative increase in vehicles along public rights of way, including near Argonaut HS and Ione Junior HS, would be ***significant and unavoidable***.

Mitigation Measure: No feasible mitigation measures are identified.
Significance After Mitigation: Significant and Unavoidable.

5.11.7 References

ECORP Consulting Inc. 2023, December. Noise Impact Assessment for the Amador County Unified School District Project.

Ione, City of. 2009, August. *City of Ione General Plan*. https://www.ione-ca.com/media/1071.

Jackson, City of. 1987. *Noise Element.* https://cms8.revize.com/revize/jacksonca/Document%20Center/Government/Planning%20Commission/General%20Plan%20Elements/1987_Noise_Element.pdf.

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———. 2023, June. *City of Jackson General Plan Update Review Draft.* https://cms8.revize.com/revize/jacksonca/Jackson_Review_GP%20June%202023.pdf.

Sutter Creek, City of. 2019, July 15. *City of Sutter Creek General Plan.* https://cityofsuttercreek.org/2022-planning-department/Sutter-Creek-General-Plan.pdf.

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5.12 POPULATION AND HOUSING

This section of the Draft Environmental Impact Report (DEIR) examines the potential of impacts of the proposed School Closure/Consolidation Program Project to population and housing.

5.12.1 Environmental Setting

5.12.1.1 REGULATORY BACKGROUND

State and local laws, regulations, plans, or guidelines related to population and housing and applicable to the proposed project are summarized below.

State

California Housing Element Law

California planning and zoning law require each city and county to adopt a general plan for future growth (California Government Code Section 65300). This plan must include a housing element that identifies housing needs for all economic segments and provides opportunities for housing development to meet that need. At the state level, the Housing and Community Development Department (HCD) estimates the relative share of California's projected population growth in each county based on California Department of Finance population projections and historical growth trends. These figures are compiled by HCD in a Regional Housing Needs Assessment (RHNA) for each region of California. Where there is a regional council of governments, the HCD provides the RHNA to the board. The council then assigns a share of the regional housing needs to each city and county. Assigning shares allows cities and counties to comment on the proposed allocations. The HCD oversees the process to ensure that the council of governments distributes its share of the state's projected housing needs.

California housing element law (Government Code Sections 65580 to 65589) requires that each city and county identify and analyze existing and projected housing needs in its jurisdiction and prepare goals, policies, and programs to further the development, improvement, and preservation of housing for all economic segments of the community, commensurate with local housing needs.

Local

Amador County General Plan

The County of Amador General Plan 2016 goals, policies, and programs that are relevant to population and housing are primarily in the Housing Element. Amador County is currently updating its housing element, a required component of the General Plan. The Countywide Housing Element addresses the housing needs of all jurisdictions in the county, with an "annex" for each jurisdiction that addresses specific housing sites and development requirements for that jurisdiction.

Sutter Creek General Plan

The Sutter Creek General Plan was adopted in July 2019. The relevant objectives, policies and implementation measures to population and housing are primarily in the land use and housing elements. For the housing element, the Regional Housing Needs Allocation for the 2007–2014 planning period was used. The 2014-2019 Amador County Join Housing Element contains the following implementation program to achieve adequate housing needs within the Sutter Creek community (Amador County 2015).

Program H-4 Planned Development. The City shall encourage developer constructed affordable housing in large, undeveloped portions of the City's planning area through use of the Planned Development (PD) land use zoning designation. The City shall encourage clustering of units on small lots to reduce the cost of lots, housing construction, improvements, site preparation, and infrastructure. The City shall require that developers providing affordable housing units or lots in planned developments show how the lots or units will be made affordable to low- and very low-income households, and maintained as such, prior to approval of a development plan or tentative map for the project.

Sutter Creek participated with Amador County and all cities in the county to prepare the Countywide 6th Cycle Housing Element, which addresses programs applicable to all jurisdictions as well as specific actions that Sutter Creek will implement (Amador 2023). The County is currently in the process of preparing its 6th Cycle Housing Element.

Ione General Plan

The City of Ione General Plan was adopted in August 2009, and the goals, policies, and programs that are relevant to population and housing are primarily in the housing element. For the housing element, the Regional Housing Needs Allocation for the 2007–2014 planning period was used. The 2014-2019 Amador County Join Housing Element contains the following implementation programs to achieve adequate housing needs within the Ione community (Amador County 2015).

Program H-1 Building Code Review. The City will continue to annually review the City's building codes for current compliance and adopt the necessary revisions so as to further local development objectives.

Program H-5 Infill Development Program. Infill development is one technique in meeting the housing needs required by expanding populations. The City will encourage the use of vacant small individual lots in the central City by reviewing, and amending as appropriate, development standards to accommodate housing development. The City will encourage the use of infill for the development of housing by addressing density requirements, which may constrain the development of housing on infill lots, and if necessary remove those constraints. The City will consider reduced impact fees for infill development.

Similar to Sutter Creek, the City of Ione is participating in the Countywide 6th Cycle Housing Element. The County is currently in the process of preparing the element.

Jackson General Plan

The goals, policies, and programs that are relevant to population and housing are primarily in the housing and land use elements. The 2014-2019 Amador County Join Housing Element contains the following implementation programs to achieve adequate housing needs within the Jackson community (Amador County 2015).

Program H-1 Resources Constraints and Priority Allocation. The Planning Commission and City Council will continue to monitor the need for growth control and consider re-instating the Resources Constraints and Priority Allocation ordinance to encourage in-fill housing development prior to annexing properties within the Sphere of Influence. The allocation ordinance requires the Planning Commission and City Council to consider infill projects prior to projects in the Sphere of Influence and also promotes higher density development, to ensure housing developments offer amenities which promote conservation of the City's natural resources and the reduction of energy use and therefore more affordable, which is closer to retail and service centers.

Program H-2 Planning Development. The City's Development Code includes provisions for planned developments, which serve to maximize the use of the land. The City will continue to use this zoning tool where applicable and appropriate, and implemented as a continuous program by the City Planning Commission and Council.

Program H-4 Building Code. The City will continue to annually review the City's building codes for current compliance and adopt the necessary revisions so as to further local development objectives. The City will annually ensure that local building codes are consistent with state mandated or recommended green building standards.

Program H-8 Inclusionary Affordable Housing. The City will continue to implement the Section 17.32 (Affordable Housing) of the Development Code. This ordinance requires subdivisions of ten or more parcels to provide ten percent inclusionary affordable housing.

Similar to Sutter Creek and Ione, the City of Jackson is participating in the Countywide 6th Cycle Housing Element. The County is currently in the process of preparing the element. Additionally, the City of Jackson is currently preparing a comprehensive update to its existing general plan. The update will plan for future growth in Jackson, including new businesses, expansion of existing businesses, and new residential uses (Jackson 2023).

Amador County Regional Transportation Plan

The 2020 Update to the Regional Transportation Plan (RTP) was adopted in March 2020, which replaced the 2015 RTP and ensures compliance with the CTC's 2017 Regional Transportation Guidelines. This document identified the region's short- and long-term transportation needs and establishes policies, programs, and projects designed to meet those needs. Content that is relevant to population and housing is in Chapter 5, Future Conditions.

5.12.1.2 EXISTING CONDITIONS

This section describes the existing population and housing conditions in Amador County and the cities of Jackson, Ione, and Sutter Creek, providing context for the analysis of the proposed project. Amador County is not represented by a council of governments or metropolitan planning organization (HCD 2020). However, the Amador County Transportation Commission is the regional transportation planning agency and local transportation commission. The Transportation Commission adopted a regional transportation plan (RTP) in March 2020 that provides populations projections for the region.

Student populations have been decreasing in the District. According to its Facilities Utilization Master Plan, Amador County Unified School District experienced an overall decline in enrollment, from 4,700 students in 2001/02 to 4,009 students in 2021/22, that is, a decrease of 14.70 percent (ACUSD 2022).

Population

The population of the Amador County from the 2010 and 2020 United States Censuses are shown in Table 5.12-1.

Table 5.12-1 Amador County Population, 2010 and 2020

	2010	2020	Change (2010–2020)	Percent Change (2010–2020)
County of Amador	38,091	40,474	2,383	6.3

Source: DOF 2021.

Population Forecast

The Amador County RTP population projections are shown in Table 5.12-2.

Table 5.12-2 Cities of Sutter Creek, Ione, and Jackson and Unincorporated Amador County Population Projections

	2013 Population	2025 Population	2035 Population	Percent Change (2013–2035)
City of Sutter Creek	2,484	2,813	3,142	26%
City of Jackson	4,613	5,015	5,417	17%
City of Ione	6,829	8,993	11,158	63%
Unincorporated	21,640	23,927	24,188	12%

Source: ACTC 2020.

Housing

Based on information gathered from the California Department of Finance, estimated available housing for 2023, including unit type characteristics, in the cities of Ione, Jackson, and Sutter Creek and the County of Amador is detailed in Table 5.12-3.

Table 5.12-3 Housing Units, Cities of Sutter Creek, Ione, and Jackson and Amador County

	City of Sutter Creek	City of Jackson	City of Ione	County of Amador
Single Detached	825	1,531	1,989	15,736
Single Attached	99	141	37	602
Multifamily (Two to Four and Five Plus)	0	43	543	1,333
Mobile Homes	109	203	58	1,399
Vacancy Rate	10.6%	9.2%	5.6%	16.1%

Source: DOF 2023.

Regional Housing Needs Assessment

The RHNA is mandated by State housing law as part of the systematic process of updating housing elements of local general plans. State law requires that housing elements identify RHNA targets set by the Department of Housing and Community Development to encourage each jurisdiction in the state to provide its fair share of very-low-, low-, moderate-, and above moderate-income housing. The RHNA does not promote growth but provides a long-term outline of housing needs in a community.

The 6th cycle RHNA for the County of Amador is 741 housing units, as show in Table 4.12-4. This illustrates that in the next eight years, the County of Amador is projected accommodate up to 741 households. The County must ensure that sufficient sites are planned and zoned for housing and available to accommodate this need, and it must implement proactive programs that facilitate and encourage the production of housing commensurate with its housing needs.

Table 5.12-4 RHNA for Amador County

Income Category	Percent of Total	Housing Unit Need
Very Low[1]	25.5%	189
Low	16.6%	123
Moderate	18.9%	140
Above-Moderate	39.0%	289
Total	100.0%	741

Source: HCD. 2020.
1. Extremely Low, 11.6%, is included in the Very Low category.

Housing Forecast

Based on the Department of Finance data, Table 4.12-5, *Amador County Housing Forecast*, highlights that the total population, household population, number of households, and persons per household will increase, but group quarters are projected to decrease.

Table 5.12-5 Amador County Housing Forecast

	2020	2025	2030	Percent Change (2020-2030)
Total Population	38,531	39,613	40,160	4%
Household Population	34,139	35,378	35,860	5%
Group Quarters	4,392	4,235	4,300	-2%
Total Households	14,760	15,218	15,397	4%
Persons per Household	2.31	2.32	2.33	1%

Source: DOF 2020.

5.12.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

PH-1 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).

PH-2 Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere.

5.12.3 Environmental Impacts

As described in Chapter 3, *Project Description*, three of the schools of the proposed project will have site improvements to accommodate the increase in student enrollment capacity at these campuses.

5.12.3.1 IMPACT ANALYSIS

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.12-1: The proposed project would not result in population growth in the project area either directly or indirectly. [Threshold PH-1]

The proposed project does not include the construction of housing units; therefore, the proposed project would not result in direct population growth.

Argonaut High School Site Improvements

Construction Phase

Construction of the proposed project would bring construction workers to the project site at Amador HS, starting with site preparation through the complete buildout of the site improvements. Construction would

occur over one phase beginning in May 2024 and ready for occupancy in June 2025. Construction would include grading and excavation, demolition and removal of hardscapes, building construction, architectural coatings, walkway construction, landscaping, signage, and street connection improvements. General construction labor is expected to be available from the local and regional labor pool. Additionally, construction jobs are short term, spanning the length of the construction phase. The proposed project's construction would not result in a long-term increase in employment and is therefore not expected to attract new residents to the area. The proposed project's construction would not directly or indirectly result in unplanned population growth in the project area, and impacts would be **less than significant**.

Operational Phase

The proposed project is a consolidation program to address the decline in enrollment in the District. At full buildout, the enrollment at the campus would increase by up to 789 students compared to existing enrollment, and the number of teaching stations would increase by approximately 16. The increase would not consist of students new to the area, but existing students from Amador HS, which is 4.6 miles away. Since ACUSD serves the entire county and the extra distance is negligible, students and families already live in the ACUSD boundaries and are unlikely to move residences to be closer to the school. The site improvements at Argonaut HS are needed to serve the increase in enrollment capacity and would not attract new residents to the area.

Teachers and staff would continue working at the District and would be reassigned to a new campus. While some teachers and staff may choose to relocate closer to their new campus, these population and housing shifts would be minimal and would be within the anticipated growth for Jackson (see Tables 5.12-2 and 5.12-5).

Thus, the proposed project would not result in unplanned indirect population growth in the project area, and impacts would be **less than significant**.

***Level of Significance Before Mitigation*:** Less than significant impact.

Ione Junior High School Site Improvements

Construction Phase

Construction of the proposed project would bring construction workers to the project site at Ione Junior HS, starting with site preparation through the complete buildout of the site improvements. Construction would occur over one phase, beginning in May 2024 and ready for occupancy in June 2025. Construction would include grading and excavation, demolition and removal of hardscapes, building construction, architectural coatings, walkway construction, landscaping, signage, and street connection improvements. General construction labor is expected to be available from the local and regional labor pool. Additionally, construction jobs are short term, spanning the length of the construction phase. The proposed project's construction would not result in a long-term increase in employment and is therefore not expected to attract new residents to the area. Thus, the proposed project's construction would not directly or indirectly result in unplanned population growth in the project area, and impacts would be **less than significant.**

Operational Phase

The proposed project is a consolidation program to address the decline in enrollment in the District. At full buildout, the enrollment at the campus would increase by up to 408students, and the number of teaching stations would increase by approximately 2. The additional students would not be new students to the District but existing students from Ione ES, which is 0.5 mile away. Because this distance is negligible and ACUSD serves the entire county, students and families already live in ACUSD and are unlikely to move residences to be closer to the school. The site improvements at Ione Junior HS are needed to serve the increase in enrollment and would not attract new residents to the area.

Teachers and staff would continue working at the District and would be reassigned to a new campus. While some teachers and staff may choose to relocate closer to their new campus, these population and housing shifts would be minimal and would be within the anticipated growth for Ione (see Tables 5.12-2 and 5.12-5).

Thus, the proposed project would not result in unplanned indirect population growth in the project area, and impacts would be **less than significant**.

***Level of Significance Before Mitigation*:** Less than significant impact.

Sutter Creek Elementary School Site Improvements

Construction Phase

Construction of the proposed project would bring construction workers to the project site at Sutter Creek ES, starting with site preparation through the complete buildout of the site improvements. Construction is anticipated to occur over one phase, beginning in Spring of 2027 and would be completed in by Spring of 2028, contingent on funding. Construction would include grading and excavation, demolition and removal of hardscapes, building construction, architectural coatings, walkway construction, landscaping, signage, and street connection improvements. General construction labor is expected to be available from the local and regional labor pool. Additionally, construction jobs are short term, spanning the length of the construction phase. The proposed project's construction would not result in a long-term increase in employment, and is therefore not expected to attract new residents to the area. Thus, the proposed project's construction would not directly or indirectly result in unplanned population growth in the project area, and impacts would be **less than significant.**

Operational Phase

The proposed project is a consolidation program to address the decline in enrollment in the District. At full buildout, the enrollment at the campus would increase by up to 421students, and the number of teaching stations would increase by approximately 12. The additional students would not be new students to the District but existing students from Sutter Creek ES who stay on for more years, thus increasing the overall enrollment. The addition of grade levels to Sutter Creek would serve existing families that are served by the elementary school. The site improvements at Sutter Creek ES are needed to serve the increase in enrollment capacity and would not attract new residents to the area.

Teachers and staff would continue working at the District and would be reassigned to a new campus. While some teachers and staff may choose to relocate closer to their new campus, these population and housing shifts would be minimal and would be within the anticipated growth for Sutter Creek (see Tables 5.12-2 and 5.12-5).

Thus, the proposed project would not result in unplanned indirect population growth in the project area, and impacts would be **less than significant.**

Level of Significance Before Mitigation: Less than significant impact.

Impact 5.12-2: Project implementation would not result in displacing people and/or housing. [Threshold PH-2]

The proposed project would be carried out on already developed school campuses, and no new campuses or expansion of existing campuses are proposed. Physical site improvements would occur on existing campuses at Argonaut HS, Ione Junior HS, and Sutter Creek ES. No dwelling units or residential uses currently occupy the three campuses. Thus, the proposed project would not displace housing or people. Therefore, no impact would occur.

Level of Significance Before Mitigation: No impact.

5.12.4 Mitigation Measures

No mitigation required.

5.12.5 Level of Significance After Mitigation

No mitigation measures are required, and the impacts are less than significant.

5.12.6 Cumulative Impacts

As discussed above, the District has experienced a declining enrollment. To better serve students and staff, the proposed project would consolidate eight of its campuses into six campuses, which necessitates site improvements at three campuses to adequately serve students. The proposed project would not generate direct or indirect population growth during construction or operation that could combine with another project. Therefore, the proposed project would not contribute to a cumulative impact related to unplanned population growth. Because the project would not displace housing or people, it would not contribute to cumulative displacement impacts.

The proposed project would not contribute to a potentially significant cumulative population and housing impacts and impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than significant.

5.12.7 References

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Amador County Unified School District (ACUSD). 2022, February. Facilities Utilization Master Plan.

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Jackson, City of. 2023, June. City of Jackson General Plan Update Review Draft. https://cms8.revize.com/revize/jacksonca/Jackson_Review_GP%20June%202023.pdf.

Sutter Creek, City of. 2022. Public Review Draft Housing Element. https://cityofsuttercreek.org/2022-announcements/Countywide_6thHE__Public-Draft.pdf.

5.13 PUBLIC SERVICES

Consistent with Chapter 5.00, this section of the DEIR evaluates the proposed project's impacts to public services providing fire protection and emergency services, police protection, school services, and library services near Argonaut HS, Ione Junior HS, and Sutter Creek ES. Park services (Threshold PS-3) are addressed in Section 5.14, *Recreation*. Public and private utilities and service systems, including water, wastewater, and solid waste services and systems, are addressed in Section 5.17, *Utilities and Service Systems*.

5.13.1 Fire Protection and Emergency Services

5.13.1.1 ENVIRONMENTAL SETTING

Regulatory Background

International Fire Code

The International Fire Code (IFC) is a model code for regulating minimum fire-safety requirements for new and existing buildings, facilities, storage, and processes. The IFC includes general and specialized technical fire- and life-safety regulations and addresses fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, use and storage of hazardous materials, protection of emergency responders, industrial processes, and various other topics. The IFC is issued by the International Code Council, which is an international organization of building officials.

State

California Fire Code

The California Fire Code (CFC; California Code of Regulations, Title 24, Part 9) is based on the 2015 IFC and includes amendments from the State of California fully integrated into the Code. The CFC contains fire safety-related building standards that are referenced in other parts of Title 24 of the California Code of Regulations. The CFC is updated once every three years; the 2022 CFC took effect on January 1, 2023.

California Health and Safety Code

Sections 13000 et seq. of the California Health and Safety Code include fire regulations for building standards (also in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

California Occupational Safety and Health Administration

In accordance with the California Code of Regulations, Title 8, Sections 1270, "Fire Prevention," and 6773, "Fire Protection and Fire Fighting Equipment," the California Occupational Safety and Health Administration has established minimum standards for fire suppression and emergency medical services. The standards include but are not limited to guidelines on the handling of highly combustible materials; firehouse sizing requirements; restrictions on the use of compressed air; access roads; and the testing, maintenance, and use of all firefighting and emergency medical equipment.

Local

Amador County Unified School District Comprehensive School Safety Plan

The District has Comprehensive School Safety Plans for its schools. The objectives of the Comprehensive School Safety Plan are to:

- Protect the life and safety of students and staff.
- Provide a framework for staff, students, parents, and community agencies to respond quickly and effectively to emergency situations, and educate them on their roles and responsibilities before, during, and after an incident.
- Protect school property and environment.
- Foster an awareness of the diverse emergency situations that can occur on or near the school campus.
- Facilitate the use of the school as an emergency facility (e.g., shelter site) at the direction of lawful authority.

Amador County Local Hazard Mitigation Plan

The purpose of hazard mitigation is to reduce or eliminate long-term risk to people and property from hazards. Amador County developed a Local Hazard Mitigation Plan to ensure the County and its residents are prepared for future hazard events (Amador County 2020).

2022 Strategic Fire Plan Amador-El Dorado Unit

The goal of the Amador-El Dorado Unit of the California Department of Forestry and Fire Protection (CAL FIRE) is to reduce the loss of life, property, watershed values, and other assets at risk from wildfire through a focused pre-fire management program and increased initial attack success (CAL FIRE 2022).

Jackson General Plan

The Jackson General Plan addresses fire protection services in the Safety Element (Jackson 1981). The Safety Element states that "[t]he developers of new sites will need to provide extensions of the distribution system to serve their projects including the off site trunk lines which will be needed to provide the required fire flows within the projects." Further the Safety Element states that "[t]he maximum supply is needed for fire fighting purposes. New developments are required to install the distribution system needed to meet the Public Utility Commission 1s regulations or the City's requirements." "It is the policy of the City of Jackson to inspect all multistory buildings, all places of public assembly and all masonry buildings built before modern structural requirements for safety were enforced; and to promote the retrofitting of such structures with reinforcement, sprinklers, fire doors, exits, and modern safety devices to enhance the safety of the users of the premises and to prevent conflagrations."

Currently, the City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals, policies, and actions related to fire and emergency protection services are outlined here (Jackson 2023).

- **Goal SA-3:** Protect life, safety, and property throughout the community by ensuring emergency preparedness.

- **Policy SA 3.3:** Ensure that critical facilities are properly supplied and equipped to provide emergency services.
- **Policy SA 3.6:** Maintain effective mutual aid agreements for police, fire, medical response, and other functions as appropriate.
- **Goal SA-4:** Maintain a safe community through adequate levels of efficient and high-quality police, fire, and emergency services.
- **Policy SA 4.1:** Provide adequate funding for fire and law enforcement services, facilities, and personnel to accommodate existing and future citizens' needs to ensure a safe and secure environment for people and property.
- **Policy SA 4.3:** Ensure that fire and emergency medical services meet existing and future demand.
- **Policy SA 4.4:** Ensure that adequate water supplies are available for fire suppression throughout the City.
- **Policy SA 4.5:** Support efforts to remedy any deficiencies in the water delivery system to ensure adequate fire suppression flows.
- **Policy SA 4.6:** Require development to construct and fund all fire suppression infrastructure and equipment needed to provide adequate fire protection services.

Ione General Plan

The Ione General Plan provides goals and policies related to fire and emergency protection services in the Public Services Element.

- **Goal PF-4:** Ensure adequate, efficient, and reliable water service to meet the needs of existing and future development.
- **Policy PF-4.3:** The City shall require that water flow and pressure be provided at sufficient levels to meet domestic, commercial, industrial, and firefighting needs. At a minimum, the water distribution system shall meet all pressure requirements outlined in the California Department of Public Health/Waterworks Standards.
- **Goal PF-13:** Maintain sufficient levels of fire protection and police services to protect public safety and property.
- **Policy PF-13.1:** The City shall strive to maintain a firefighting capability sufficient to maintain a proper fire response time as a general guideline for service provision and locating new fire stations.
- **Policy PF-13.2:** The City shall require all new developments to provide adequate emergency access features, including secondary access points, as determined by the Ione Fire Department.

Sutter Creek General Plan

The Sutter Creek General Plan provides goals, objectives and policies related to fire and emergency protection services in the Public Services and Facilities Element and Safety Element.

- **Objective PS-1.2:** The adequate provision of water that keeps pace with demand and fire protection needs.
- **Objective PS-1.9:** The City should maintain a good working relationship with the Sutter Creek Fire Protection District and Amador Fire Protection District in the interest of public safety and the provision of adequate fire protection services.
- **Policy PS-1.9.2:** The Sutter Creek Fire Protection District is encouraged to develop a 10-year fire protection service plan based upon growth assumptions specified in the General Plan as well as projections for the surrounding area.
- **Objective PS-1.10:** Continue cooperation with the Sutter Creek Fire Protection District and American Legion Ambulance Service for the provision of prompt and adequate emergency medical service.
- **Policy PS-1.10.1:** The City shall cooperate with the Sutter Creek Fire Protection District and American Legion Ambulance Service in the provision of prompt and adequate emergency medical service.
- **Objective S-1.4:** To minimize possible threat to life or property due to wildland and urban fires.
- **Policy S-1.4.1:** The Sutter Creek Fire District shall be asked by the City to review development plans, land division projects, and planned developments to ensure compliance with fire suppression and prevention requirements.
- **Policy S-1.4.2:** New development shall ensure there is sufficient water supply and facilities for fire suppression units in the event of a wildland fire.
- **Policy S-1.4.3:** Looped water systems shall be installed within new developments, where feasible, and new water systems shall provide for adequate pressure and volumes at each hydrant installed.
- **Policy S-1.4.4:** In new developments there shall be sufficient access for emergency vehicles and evacuation of residents. Two or more routes of access should be provided, preferably on different sides of the development.

Existing Conditions

Jackson Fire Department

Fire Stations, Equipment, and Staffing

The Jackson Fire Department serves the City of Jackson and provides fire protection services to the Argonaut HS campus. The following fire stations would serve Argonaut HS:

- Jackson Fire Department Station #131 (175 Main Street, Jackson, CA)
- Jackson Fire Department Station #132 (10600 Argonaut Drive, Jackson, CA)

Wildfire Hazard Zones

The southeastern portion of the city is within a moderate fire hazard severity zone (FHSZ) within a State Responsibility Area (SRA), and the city is surrounded by land in moderate and high FHSZs in a SRA (CAL FIRE 2023). Argonaut HS is not in a wildfire hazard zone.

Ione Fire Department

Fire Stations, Equipment, and Staffing

The Ione Fire Department serves the City of Ione and provides fire protection services to the Ione Junior HS campus. The primary fire station that would serve Ione Junior HS is Fire Station #2; Fire Station #1 is unstaffed and only staffed by volunteer firefighters. The equipment and staff per station is as follows (Ione 2023):

- Ione Fire Department Station #1 (22 West Jackson Street, Ione, CA)
  - 2 structure engines
  - 1 wildland engine
  - 1 rescue squad
  - Unstaffed, volunteers only

- Ione Fire Department Station #2 (600 Preston Avenue, Ione, CA)
  - 2 structure engines
  - 1 wildland engine
  - 1 105-foot ladder truck
  - 1 2,000-gallon water tender
  - 1 rescue squad
  - 1 support/rehab unit
  - 1 Quick attack
  - 1 hazmat decon unit
  - 1 light plant
  - Staffed full-time with an average of 2 or 3 firefighters plus duty officer

- Reserve units:
  - 1 structure engine
  - 1 106-foot ladder truck

Ione Fire Department's response time goals are 3-5 minutes for emergency and non-emergency calls (Ione 2023).

Current deficiencies of the Ione Fire Department include accessing roadways and streets during traffic, wildland urban interfaces, and low daytime staffing (Ione 2023). See Appendix I.

Mutual Aid

Ione Fire Department has countywide mutual aid; the closest is Mule Creek State Prison Fire Department (depending on availability); all other resources are a minimum of 15 minutes away (Ione 2023).

Wildfire Hazard Zones

The northeastern portion of the city is in a very high FHSZ (VHFHSZ) in a Local Responsibility Area (LRA), and the southeastern and southwestern portions of the city are within a moderate FHSZ in the SRA (CAL FIRE 2023). Ione Junior HS is not in a wildfire hazard zone.

Sutter Creek Fire Protection District

Fire Stations, Equipment, and Staffing

The Sutter Creek Fire Protection District (SCFPD) serves the City of Sutter Creek and provides fire protection services to the Sutter Creek ES campus. The following fire station would serve Sutter Creek ES:

- Sutter Creek Fire Protection District (350 Hanford Street, Sutter Creek, CA)

Wildfire Hazard Zones

Portions of land in the northeastern, eastern, northwestern, and southwestern parts of the city are in a moderate or high FHSZ in the SRA (CAL FIRE 2023). Sutter Creek ES is not in a wildfire hazard zone.

5.13.1.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

PS-1 Result in a substantial adverse physical impact associated with the provisions 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 fire protection services.

5.13.1.3 ENVIRONMENTAL IMPACTS

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.13-1: The proposed project would introduce new structures and increase student enrollment capacities into the service boundaries of the Jackson Fire Department, Ione Fire Department, and Sutter Creek Fire Protection District, but would not new or physically altered fire protection facilities. [Threshold PS-1]

A significant environmental impact could result if the implementation of the proposed project increased demand for fire protection services to the extent that the construction of new or physically altered fire facilities would be needed and could cause physical impacts.

A deficiency in the provision of adequate public safety services in and of itself is not a CEQA impact because it does not result in a foreseeable direct or indirect physical impact on the environment. Where a project causes a need for additional public safety services resulting in the need to construct new facilities or additions to existing facilities, the construction or operation of which results in a potential impact on the environment, then the effect would need to be assessed in this DEIR. The ultimate determination of whether there is a significant impact on the environment related to public safety services from a project is determined by whether the construction of new or expanded public safety facilities is a reasonably foreseeable direct or indirect effect of the project.

Argonaut High School Site Improvements

The closest Jackson Fire Department station to the project site is Station #132, approximately 0.4 mile northeast of the site. The proposed project would combine Amador HS and Argonaut HS at the Argonaut HS campus, resulting in a student body increase of up to 789 students, and the number of teaching stations would increase by 16. While the students at the campus would be students from ACUSD's existing service boundaries, the additional capacity would result in an increase of students within the Jackson Fire Department service boundaries.

The proposed project would not change the use of the campus nor introduce incompatible uses to the campus. The proposed project includes the construction of an extended pick-up/drop-off area within the Argonaut HS campus to accommodate the increase in enrollment capacity onsite. The proposed pick-up/drop-off would accommodate more vehicles onsite; thus, reducing vehicle queuing on public rights-of-way. Further, the campus supervisor would control vehicles leaving the campus (metering) to allow for efficient circulation onto public streets. Further, the campus would be required to maintain adequate emergency access.

The construction and operation of the campus would comply with the most current adopted California Fire Code and fire and life safety standards of the State of California. As part of the project review process, the Division of State Architect (DSA) and Jackson Fire Department would require approval of building plans for site plan and emergency access. DSA and Jackson Fire Department would review site plans and design plans to ensure adequate fire requirements (e.g., the number and locations of fire hydrants, etc.) and emergency access is met. Additionally, as discussed in Impact 5.13-2, below, the proposed project would be required to comply with the District's Comprehensive School Safety Plan for the campus, which includes life and safety protection objectives and provides framework for its schools before, during, and after an emergency situation, and includes safety.

Therefore, project implementation would not require expansion of fire protection services such that new or physically altered fire stations would be required. Impacts would be less than significant.

Ione Junior High School Site Improvements

The Ione Fire Department Station 2 is approximately 0.5 mile north of the site. The proposed project would move Ione ES to the Ione Junior HS campus and add TK through fifth grades to the school. The proposed site improvements at Ione Junior HS would increase enrollment up to 408 students and 2 teaching stations compared to existing conditions. While the students at the campus would be students from ACUSD's existing

service boundaries, the additional capacity would result in an increase of students at Ione Junior HS and an overall decrease of students within the Ione Fire Department service boundaries with the closure of Ione ES.

The Ione Fire Department identifies existing deficiencies related to fire protection services to Ione Junior HS, including access for responding units, local traffic, wildfire concerns, low day time staffing (Ione 2023). The proposed project would contribute to these deficiencies.

The proposed project would not change the use of the campus nor introduce incompatible uses to the campus. The proposed project includes the implementation of an improved pick-up/drop-off area within the Ione Junior HS campus to accommodate the increase in enrollment capacity onsite. The proposed pick-up/drop-off would separate bus and vehicle traffic. The campus supervisor would oversee a valet program where campus personnel help load and unload students from vehicles and buses and control vehicles leaving the campus (metering) to allow for efficient circulation onto public streets. The pick-up/drop-off would reduce vehicle queuing on public rights-of-way. Further, the campus would be required to maintain adequate emergency access.

The construction and operation of the campus would comply with the most current adopted California Fire Code and fire and life safety standards of the State of California. As part of the project review process, the DSA and Ione Fire Department would require approval of building plans for site plan and emergency access, including fire access, bus access and internal circulation. Additionally, DSA and the Ione Fire Department would review site plans and design plans to ensure adequate fire requirements (e.g., the number and locations of fire hydrants, etc.) and emergency access is met. Additionally, as discussed in Impact 5.13-2, below, the proposed project would be required to comply with the District's Comprehensive School Safety Plan for the campus, which includes life and safety protection objectives and provides framework for its schools before, during, and after an emergency situation, and includes traffic safety.

The Ione Fire Department's service letter response (Appendix I), indicates future plans to build a third fire station that would also respond to calls at Ione Junior HS; however, this third station would not be the primary station (Ione 2023). The future construction of this fire station would occur independent of the proposed project. If and when the City proceeds with building the fire station, the City would be required to conduct a separate evaluation of environmental impacts through the CEQA process. Any assessment of specific construction or its potential for adverse impacts would be speculative and beyond the scope of this DEIR.

With the implementation of the District's Comprehensive School Safety Plan and review and approval by DSA, access and response times would not require new or physically altered police facilities. Therefore, project implementation would not require expansion of fire protection services such that new or physically altered fire stations would be required. Impacts would be less than significant.

Sutter Creek Elementary School Site Improvements

The SCFPD is approximately 470 feet east of the project site. The proposed project would expand Sutter Creek ES to serve transitional kindergarten to sixth grades at the campus. The enrollment of the school would increase up to 421 students and 12 teaching stations. While the students at the campus would be students from ACUSD's existing service boundaries, the additional capacity would result in an increase of students within the SCFPD's service boundaries.

The proposed project would not change the use of the campus nor introduce incompatible uses to the campus. The campus supervisor would oversee a valet program where campus personnel help load and unload students from vehicles and buses and control vehicles leaving the campus (metering) to allow for efficient circulation onto public streets. Further, the campus would be required to maintain adequate emergency access.

The construction and operation of the campus would comply with the most current adopted California Fire Code and fire and life safety standards of the State of California. As part of the project review process, the DSA and Sutter Creek Fire Protection District would review and approve building plans for site plan and emergency access. Additionally, the DSA and SCFPD would review site plans and design plans to ensure adequate fire requirements are met (the number and locations of fire hydrants, etc.) and emergency access is met. Therefore, project implementation would not require expansion of fire protection services such that new or physically altered fire stations would be required. Impacts would be less than significant.

Level of Significance Before Mitigation: Impact 5.13-1 would be less than significant.

5.13.1.4 MITIGATION MEASURES

No mitigation measures are required.

5.13.1.5 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

5.13.1.6 CUMULATIVE IMPACTS

The geographic area for cumulative analysis of fire protection services is the service territory for the Ione and Jackson fire departments and SCFPD. Cumulative projects in the service areas would require increased fire protection and emergency services to serve new development. Residential and employment changes could result in an increased demand for public services and facilities, including fire protection. The impacts of new development are evaluated on a case-by-case basis. Service providers would continue to evaluate levels of service and potential funding sources to meet demand. Similar to the proposed project, each cumulative project would be required to adhere to applicable building and fire codes and would be required by their respective jurisdiction for land use and zoning consistency and compliance with applicable design and access requirements. As the proposed project is a school project, the DSA would also be required to review and approve fire access, which would ensure that fire protection services are not impacted. The proposed project would not contribute to a significant cumulative impact, and cumulative impacts related to fire protection services would be less than significant.

5.13.2 Police Protection

5.13.2.1 ENVIRONMENTAL SETTING

Regulatory Background

Local

Amador County Unified School District Comprehensive School Safety Plan

The District has Comprehensive School Safety Plans for its schools. The objectives of the Comprehensive School Safety Plan are to:

- Protect the life and safety of students and staff.
- Provide a framework for staff, students, parents, and community agencies to respond quickly and effectively to emergency situations, and educate them on their roles and responsibilities before, during, and after an incident.
- Protect school property and environment.
- Foster an awareness of the diverse emergency situations that can occur on or near the school campus.
- Facilitate the use of the school as an emergency facility (e.g., shelter site) at the direction of lawful authority.
- Facilitate the resumption of normal school activities in a timely manner.

Jackson General Plan

The Jackson General Plan does not provide goals and policies related to police services.

Ione General Plan

The Ione General Plan provides goals and policies related to police protection services in the Public Facilities Element.

- **Goal PF-13:** Maintain sufficient levels of fire protection and police services to protect public safety and property.
- **Policy PF-13.3:** Ensure that the Police Department has sufficient space and facilities to support law enforcement needs.
- **Policy PF-13.4:** The City shall promote the use of volunteer and educational programs to assist police personnel.
- **Policy PF-13.5:** The City shall strive to maintain a law enforcement capability sufficient to maintain a safe community and proper response time as a general guideline for service provision.

Sutter Creek General Plan

The Ione General Plan provides goals, objectives, and policies related to police protection services in the Public Services and Facilities Element and Environmental Justice Element.

- **Objective PS-1.8:** New development projects shall be required to provide for their incremental impacts upon police protection facilities.
- **Policy PS-1.8.1:** The City should obtain a new police department facility that is adequately designed and equipped to meet projected demands. The City should establish a revenue plan and adopt mitigation fees as may be necessary to pay for the costs of the new facility.
- **Objective PS-1.8:** New development projects shall be required to provide for their incremental impacts upon police protection facilities.

Existing Conditions

Jackson Police Department

Law enforcement and police protection services are provided by the Jackson Police Department at 33D Broadway in the City of Jackson. The Jackson Police Department has a total of eight sworn officers (chief of police, captain, sergeant, and five patrol officers), eight patrol vehicles, one motorcycle, and two administrative vehicles (Mynderup 2023).

On average, the Jackson Police Department's response time for emergencies is 3 minutes, and nonemergencies is 4 minutes (Mynderup 2023). The Jackson Police Department's vehicle fleet consists of older vehicles in need of constant repairs, the police station is outdated (built in the 1970s), and staffing levels are currently down one full-time position. In order to meet the ratio of police to population goal of two officers per 1,000 residents, the Jackson Police Department would need an additional two officers (total 10 officers) to meet this goal (Mynderup 2023) (see Appendix I).

Ione Police Department

Law enforcement and police protection services are provided by the Ione Police Department at 1 East Main Street in the City of Ione. The station is staffed by one officer daily, and has one police chief, one sergeant, one corporal, four full-time patrol officers, one part-time reserve patrol officer, twenty volunteers, eight patrol cars, and one motorcycle (Alfred 2023).

The Ione Police Department's response time goals are less than two minutes for emergencies and five minutes for nonemergencies; the current average response times are two minutes for emergencies and six minutes for nonemergencies (Alfred 2023).

The Ione Police Department noted that current staffing levels are not adequate for traffic, and that there are challenges in hiring qualified staff. The current population in Ione Police Department's service area (excluding the prison) is approximately 5,500 residents. The national published ratio by the FBI is 2.4 officers per 1,000 residents; Ione Police Department strives to meet this ratio but does not currently (Alfred 2023).

Ione Police Department is currently working with the State of California to procure state surplus property in order to construct new station(s) (Alfred 2023). See Appendix I.

Sutter Creek Police Department

Law enforcement and police protection services are provided by the Sutter Creek Police Department at 18 Main Street in the City of Sutter Creek.

5.13.2.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

PS-2 Result in a substantial adverse physical impact associated with the provisions 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 police protection services.

5.13.2.3 ENVIRONMENTAL IMPACTS

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.13-2: The proposed project would increase student enrollment capacities in the service boundaries of the Jackson Police Department, Ione Police Department, and Sutter Creek Police Department, but would not require new or physically altered police protection facilities. [Threshold PS-2]

A significant environmental impact could result if the implementation of the proposed project increased demand for police protection services to the extent that the construction of new or physically altered police facilities would be needed and could cause physical impacts.

A deficiency in the provision of adequate public safety services in and of itself is not a CEQA impact because it does not result in a foreseeable direct or indirect physical impact on the environment. Where a project causes a need for additional public safety services resulting in the need to construct new facilities or additions to existing facilities, the construction or operation of which results in a potential impact on the environment, then the effect would need to be assessed in this DEIR. The ultimate determination of whether there is a significant impact on the environment related to public safety services from a project is determined by whether the construction of new or expanded public safety facilities is a reasonably foreseeable direct or indirect effect of the project.

Argonaut High School Site Improvements

The Jackson Police Department is approximately 1.1 miles southeast of the site. The proposed project would combine Amador HS and Argonaut HS at the Argonaut HS campus, in a potential student body increase of up to 789 students, and the number of teaching stations would increase by 16. While the students at the campus would be students from ACUSD's existing service boundaries, the additional capacity would result in an increase of students within the Jackson Police Department service boundaries. The Jackson Police Department

anticipates an increase in traffic volume, violations, vehicle collisions, off-campus parking, and crowd size at school events which would increase the need for police security and traffic control (Mynderup 2023).

The proposed improvements at Argonaut HS would not change the use of the campus nor introduce incompatible uses to the campus. The campus would continue to be fenced; thus, controlling access to the campus. The proposed project would include pick-up/drop-off improvements at Argonaut HS as discussed in Chapter 3, *Project Description*, which would allow for more vehicles to be accommodated onsite. The campus supervisor would control vehicles leaving the campus (metering) to allow for efficient circulation onto public streets to promote safety and reduce vehicle conflicts. The improvements at Argonaut HS would be required to be reviewed by the Jackson Fire Department and DSA to ensure adequate access, including emergency access, and site design.

The proposed improvements at Argonaut HS would be required to comply with the District's Comprehensive School Safety Plan for the campus, which includes life and safety protection objectives and provides framework for its schools before, during, and after an emergency situation. The District's Comprehensive School Safety Plan also includes specialized procedures in the event of an emergency, including for controlling traffic at the school; the responsibilities of the traffic controller (who is either a staff member or parent volunteer) include setting out parking area directional signs and traffic cones, maintaining order and directing cars away from areas designated for emergency vehicles, and developing a procedure that enables students to be released directly to the authorized adult's vehicle in situations where the majority of parents will be arriving at once and there is no room for parent parking or turnaround (ACUSD 2023c).

The Jackson Police Department has adequate resources to meet the additional demands at the school (Mynderup 2023). Project implementation would not require expansion of police protection services such that new or physically altered police stations would be required. Impacts would be less than significant.

Ione Junior High School Site Improvements

The Ione Police Department is located approximately 0.28 miles northeast of the project site. The proposed project would move Ione ES to the Ione Junior HS campus and would add TK through sixth grades to the school. While the proposed project could add up to 408 students compared to existing conditions, the projected enrollment at Ione Junior HS would be 649 students, which is within the existing enrollment capacity. Compared to existing enrollment capacity, the proposed improvements at Ione Junior HS would only increase enrollment capacity by 26 students. Further, the number of teaching stations would increase by two. Therefore, the increase in students and staff would not be substantially greater than what the campus is currently designed to accommodate. Nevertheless, while the students at the campus would be students from ACUSD's existing service boundaries, the additional capacity would result in an increase of students at Ione Junior HS campus but an overall decrease of students within the Ione Police Department service boundaries with the closure of Ione ES.

Ione Police Department indicated that there are existing deficiencies associated with current staffing levels that are not adequate for traffic issues and further states challenges to hiring qualified staff. The proposed project would contribute to these deficiencies, including traffic congestion. Further, Ione Police Department indicated that South Sacramento Street was not designed as an exit for bus traffic. Ione Police Department indicated that

access and response times at the project site must be addressed because the proposed kindergarten drop-off location poses a number of issues (turning movements, access, pedestrian conflicts).

As discussed above, the proposed student enrollment capacity would not be substantially greater than the campus's existing enrollment capacity. The proposed improvements at Ione Junior HS would not change the use of the campus nor introduce incompatible uses to the campus. The campus would continue to be fenced; thus, controlling access to the campus. The proposed project includes the implementation of an improved pick-up/drop-off area within the Ione Junior HS campus to accommodate the increase in enrollment capacity onsite. The proposed pick-up/drop-off would separate bus and vehicle traffic. The campus supervisor would oversee a valet program where campus personnel help load and unload students from vehicles and buses and control vehicles leaving the campus (metering) to allow for efficient circulation onto public streets. The pick-up/drop-off would reduce vehicle queuing on public rights-of-way. As discussed above and further discussed in Chapter 5.15, *Transportation*, the proposed project would be reviewed by DSA and the Ione Fire Department to ensure adequate vehicle ingress-egress onto the project site, including bus access and internal circulation, and adequate emergency access is maintained at all times. Vehicles traveling to and from the project site, such as along Sacramento Street, would be required to adhere to standard traffic regulations, such as making room for emergency vehicles to pass.

Further, the proposed improvements at Ione Junior HS would be required to comply with the District's Comprehensive School Safety Plan for the campus, which includes life and safety protection objectives and provides framework for its schools before, during, and after an emergency situation. The District's Comprehensive School Safety Plan also includes specialized procedures for controlling traffic at the school; the responsibilities of the traffic controller (who is either a staff member or parent volunteer) include setting out parking area directional signs and traffic cones, maintaining order and directing cars away from areas designated for emergency vehicles, and developing a procedure that enables students to be released directly to the authorized adult's vehicle in situations where the majority of parents will be arriving at once and there is no room for parent parking or turnaround (ACUSD 2023c).

The City is working with the State of California to procure state surplus property to build a new police station that could serve the campus (Alfred 2023). However, the construction of this potential police station would occur independent of the proposed project. If and when the State of California and the City of Ione proceed with the surplus land process to build a police station, the City would be required to conduct a separate evaluation of environmental impacts through the CEQA process. Any assessment of specific construction or its potential for adverse impacts would be speculative and beyond the scope of this DEIR.

With the implementation of the District's Comprehensive School Safety Plan, adherence to standard motor vehicle laws, and review and approval by DSA, access, response times, and potential vehicle-pedestrian conflicts would not require new or physically altered police facilities. Therefore, project implementation would not require expansion of police protection services such that new or physically altered police stations would be required. Impacts would be less than significant.

Sutter Creek Elementary School Site Improvements

The Sutter Creek Police Department is located approximately 0.61 mile southeast of the project site. The proposed project would expand Sutter Creek ES to serve transitional kindergarten through sixth grades at the campus. The enrollment of the school would increase by 421 students and 12 teaching stations. While the students at the campus would be students from ACUSD's existing service boundaries, the additional capacity would result in an increase of students within the Sutter Creek Police Department's service boundaries. Additionally, as indicated above, the SCFPD and DSA would review plans to ensure adequate emergency access and site design.

The proposed improvements at Sutter Creek ES would not change the use of the campus nor introduce incompatible uses to the campus. The campus would continue to be fenced; thus controlling access to the campus. The campus supervisor would oversee a valet program where campus personnel help load and unload students from vehicles and buses and control vehicles leaving the campus (metering) to allow for efficient circulation onto public streets. Further, the campus would be required to maintain adequate emergency access.

The proposed improvements at Sutter Creek ES would be required to comply with the District's Comprehensive School Safety Plan for the campus which includes life and safety protection objectives and provides framework for its schools before, during, and after an emergency situation. The District's Comprehensive School Safety Plan also includes specialized procedures for controlling traffic at the school; the responsibilities of the traffic controller (who is either a staff member or parent volunteer) include setting out parking area directional signs and traffic cones, maintaining order and directing cars away from areas designated for emergency vehicles, and developing a procedure that enables students to be released directly to the authorized adult's vehicle in situations where the majority of parents will be arriving at once and there is no room for parent parking or turnaround (ACUSD 2023c).

Therefore, project implementation would not require expansion of police protection services such that new or physically altered police stations would be required. Impacts would be less than significant.

Level of Significance Before Mitigation: Impact 5.13-2 would be less than significant.

5.13.2.4 MITIGATION MEASURES

No mitigation measures are required.

5.13.2.5 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

5.13.2.6 CUMULATIVE IMPACTS

Cumulative projects within the cities of Ione, Jackson, and Sutter Creek would require increased law enforcement services to serve new development. The impacts of new development are evaluated on a case-by-case basis. Service providers would continue to evaluate levels of service and potential funding sources to meet

demand. Development projects would be reviewed by police staff prior to development permit approval to ensure adequate security measures are provided for each site-specific development in their jurisdiction.

The proposed project would increase the number of students within the service boundaries of the police departments. However, the campuses would continue to be fenced and supervised and supervisors at each campus would ensure adequate access and circulation. Additionally, the ACUSD's Comprehensive School Safety Plans for its campuses provide framework for its schools before, during, and after an emergency situation. The proposed project would not result in a cumulatively considerable impact, and cumulative impacts related to police protection services would be less than significant.

5.13.3 School Services

5.13.3.1 ENVIRONMENTAL SETTING

Regulatory Background

Amador County General Plan

The Amador County General Plan identifies goals and policies related to school services in the Land Use and Governance Elements.

- **Goal LU-8:** Maintain high quality child care facilities, schools and libraries.
- **Policy LU-8.1:** Work with the Amador County Unified School District (ACUSD) to maintain local schools as community gathering and recreation locations. Work toward joint use of school facilities for recreation and lifelong learning wherever feasible and desirable.
- **Policy LU-8.2:** Encourage and facilitate the development of early care and education services throughout the county to meet the current and future needs of young children and families.
- **Policy LU-8.3:** Work with ACUSD to ensure that new school facilities can be planned, financed, and constructed as necessary to serve current population and future development.
- **Policy LU-8.5:** Ensure that new residential developments include on-site pedestrian facilities to provide safe routes to schools.
- **Policy G-2.6:** Consider schools an essential part of the infrastructure required to accommodate new development and establish maintaining adequate school facilities as a community priority. Ensure that potential effects on the County educational system are considered when reviewing development projects.

Jackson General Plan

The Jackson General Plan does not provide goals and policies related to school services.

Ione General Plan

The Ione General Plan identifies goals and policies related to school facilities in the Public Facilities Element.

- **Policy PF-2.2:** Encourage coordination with public service providers, including schools, regional parks and recreation, utility, transit, and other service districts in developing service planning strategies.
- **Goal PF-8:** Ensure the highest possible level of education to students in Ione including re-establishing a high school in the community.
- **Policy PF-8.1:** Work closely with the Amador County Unified School District to identify needs for public education programs, including developing and expanding extracurricular recreation and educational programs for primary and secondary education where feasible.
- **Policy PF-8.2:** Assist the school district in identifying and acquiring school site(s) as a part of new development.
- **Policy PF-8.3:** The City shall include the following criteria in assisting the ACUSD in school site selection and provision of utilities:
    - Traffic impacts on nearby roadways and effect on City standards for Level of Service.
    - Interrelatedness of school sites with churches, parks, greenways, and offstreet paths.
    - Walking distance to the greatest number of students.
    - Safe walking routes to and from school.
    - Joint use potential of new school sites with existing and planned community recreation and parks programs and facilities.
    - Linkages with trails, bikeways, and pedestrian paths.
- **Policy PF-8.4:** Work with the Amador County Unified School District to facilitate the construction of a high school within Ione.

Sutter Creek General Plan

The Sutter Creek General Plan discusses goals, objectives, and policies related to school facilities in the Public Services and Facilities Element.

- **Objective PS-1.6:** The provision of adequate public facilities, including schools, and public recreation facilities.
- **Policy PS-1.6.1:** The City shall cooperate with the Amador County Unified School District to help obtain a new elementary school site with public recreation facilities in the Sutter Creek planning area.
- **Policy PS-1.6.2:** New public buildings, including school facilities, should be located and designed to conform with applicable provisions of this General Plan and City Codes.

Existing Conditions

The ACUSD consists of six elementary schools, two junior high schools, two high schools, and one alternative high school, and serves approximately 4,000 preschool through 12th grade and adult students (ACUSD 2023a; ACUSD 2023b).

Argonaut High School Campus

Argonaut HS has a 2022-2023 enrollment of 536 students, and a capacity of 925 students. The school serves grades 9 through 12; there are 37 teaching stations at the school.

Ione Junior High School Campus

Ione Junior HS has a 2022-2023 enrollment of 393 students, and a capacity of 775 students. The school serves grades 6 through 8; there are 31 teaching stations at the school.

Sutter Creek Elementary School Campus

Sutter Creek ES has a 2022-2023 enrollment of 204 students, and a capacity of 325 students. The school serves grades third through sixth grades; there are 13 teaching stations at the school.

5.13.3.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

PS-4 Result in a substantial adverse physical impact associated with the provisions 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 school services.

5.13.3.3 ENVIRONMENTAL IMPACTS

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.13-3: The proposed project would increase enrollment capacities at the Argonaut High School, Ione Junior High School, and Sutter Creek; however, the proposed project would not require new or physically altered school facilities beyond what is evaluated in this DEIR. [Threshold PS-4]

Argonaut High School, Ione Junior High School, and Sutter Creek Elementary School Site Improvements

The proposed project includes the consolidation and closure of schools within the District. Site and building improvements are proposed at Argonaut HS, Ione Junior HS, and Sutter Creek ES to accommodate the combination of Amador HS and Argonaut HS, the relocation of Ione ES to Ione Junior HS and addition of preschool, TK through sixth grades, and the expansion of Sutter Creek ES to serve transitional kindergarten

through sixth grades. While the Ione General Plan and the Sutter Creek General Plan state the need for a new high school and elementary school, respectively, such school facilities are not proposed as a part of the proposed project. The proposed project would not increase the number of students within ACUSD's boundaries but would relocate them to other schools within the District to consolidate school resources for efficient program administration and focusing resources on fewer facilities to better serve staff and students. An evaluation of the proposed project's potential impacts to the environment during construction and operation is provided throughout Chapter 5, *Environmental Analysis,* of this DEIR. New or physically altered school facilities would not be necessitated beyond the scope of the proposed project. As such, impacts would be **less than significant**.

Level of Significance Before Mitigation: Impact 5.13-3 would be less than significant.

5.13.3.4 MITIGATION MEASURES

No mitigation measures are required.

5.13.3.5 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

5.13.3.6 CUMULATIVE IMPACTS

The area considered for cumulative impacts to school services is the ACUSD service boundary. The proposed project would not increase the number of students within its service boundary but would propose site and building improvements to accommodate existing students upon implementation of the proposed project. An evaluation of the proposed project's potential impacts to the environment during construction and operation is provided throughout Chapter 5, *Environmental Analysis,* of this DEIR. New or physically altered school facilities would not be necessitated beyond the scope of the proposed project. As such, impacts would be less than significant.

If in the future new school facilities are needed to accommodate students, the District would be required to evaluate the environmental impacts of future school projects pursuant to CEQA at that time. Because the District would be required to first identify a need, location and scope for any future school projects and because environmental review would be required at that time, it would be speculative and beyond the scope of this EIR to evaluate future school projects.

Therefore, the proposed project would not result in a cumulatively considerable impact, and cumulative impacts related to school services would be less than significant.

5.13.4 Library Services

5.13.4.1 ENVIRONMENTAL SETTING

Regulatory Background

Amador County General Plan

The Amador County General Plan identifies policies related to library services in the Land Use Element.

- **Goal LU-8:** Maintain high quality child care facilities, schools and libraries.
- **Policy LU-8.4:** Provide for County library facilities and services consistent with community needs.

Jackson General Plan

The Jackson General Plan does not provide goals and policies related to library services.

Ione General Plan

The City of Ione General Plan Public Facilities Element provides goals and policies related to library services.

- **Goal PF-10:** Ensure that adequate library services and facilities are provided to the City's residents.
- **Policy PF-10.1:** Encourage the expansion of adequate library facilities and programs to meet the needs of Ione residents as the community grows.

Sutter Creek General Plan

The Sutter Creek General Plan does not provide objectives and policies related to library services.

Existing Conditions

Amador County Library

The County operates five libraries—Amador County Main Library (in Jackson), Ione Branch Library, Pine Grove Branch Library, Pioneer Branch Library, and Plymouth Branch Library; there are no libraries in Sutter Creek (Amador County 2023a). The libraries provide books, magazine, DVDs, audio and e-books, CDs, Internet access, online resources, newspapers, and other resources for patrons (Amador County 2023a). The Amador County Library also participates in inter-library loans, which allows patrons to request items from other participating libraries (Amador County 2023b). For Amador County residents who are unable to go to the library due to illness, age, infirmity, or disability, the Amador County Library provides a "Books at Home" service where volunteers deliver library materials to these individuals (Amador County 2023b).

Argonaut High School Library

The Argonaut HS Library has over 4,800 books and periodicals, *Ledger Dispatch Acorn* newspaper, and a full set of Chromebooks connected to the internet; the library also carries school textbooks (AHS 2023).

Ione Junior High School Library

The Ione Junior HS has over 10,000 books and maintains the school's textbook and Chromebook inventory (IJHS 2023).

Sutter Creek Elementary School Library

The Sutter Creek Elementary Library has an updated collection of children's literature (SCES 2023).

5.13.4.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

PS-5 Result in a substantial adverse physical impact associated with the provisions 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 library services.

5.13.4.3 ENVIRONMENTAL IMPACTS

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.13-4: The proposed project would not generate new residents in the County, and therefore, would not exacerbate library services within the Amador County Library system. [Threshold PS-5]

Argonaut High School, Ione Junior High School, and Sutter Creek Elementary School Site Improvements

The proposed project includes the consolidation and closure of schools within the District. The proposed project would not induce population growth within the County, but rather, accommodate existing students within ACUSD's service boundary (see Section 5.12, *Population and Housing*). As the demand for library services is typically generated by residential growth, the proposed project would not impact existing libraries within the County. Additionally, Argonaut HS, Ione Junior HS, and Sutter Creek ES would continue to provide library services for its students upon project completion. New or physically altered library facilities would not be required due to the implementation of the proposed project. As such, impacts would be **less than significant**.

Level of Significance Before Mitigation: Impact 5.13-4 would be less than significant.

5.13.4.4 MITIGATION MEASURES

No mitigation measures are required.

5.13.4.5 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impacts would be less than significant.

5.13.4.6 CUMULATIVE IMPACTS

The area considered for cumulative impacts to library services is Amador County. The proposed project would not result in population growth within the County, and as such, would not contribute to a cumulative impact. New or physically altered library facilities would not be required due to implementation of the proposed project. Therefore, the proposed project would not result in a cumulatively considerable impact, and cumulative impacts related to library services would be less than significant.

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5. Environmental Analysis
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5.14 RECREATION

Consistent with Chapter 5.00, this section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the Proposed Project to impact public parks and recreational facilities near Argonaut HS, Ione Junior HS, and Sutter Creek ES.

5.14.1 Environmental Setting

5.14.1.1 REGULATORY BACKGROUND

State

California Public Park Preservation Act

The primary instrument for protecting and preserving parkland is California's Public Parkland Preservation Act of 1971. Under the Public Resources Code, cities and counties may not acquire any real property that is in use as a public park for nonpark use unless compensation, land, or both are provided to replace the parkland acquired. This provides no net loss of parkland facilities.

Local

Amador County Park and Recreation Master Plan

The Park and Recreation Master Plan (Master Plan) was adopted in November 2016 and is intended to guide decisions related to park facilities and recreation programs to Amador County residents for the next 10 years (ACRA 2016). This Master Plan establishes park planning standards that reflect current information about Amador County's population, the existing park inventory, recreation needs, and the evolving trends within the parks and recreation industry. The Master Plan recommends a minimum of 3 acres per 1,000 population for developed active parkland and a minimum of 5 acres per 1,000 people for rural and small communities. Other planning recommendations include implementing necessary park studies, securing funding for several new parks; ongoing coordination between Amador County Recreation Agency, member agencies, and Amador County Transportation Commission for non-park trails planning; and a feasibility analysis of implementing a multi-use trail network in the Lake Comanche Village community.

Jackson General Plan

The Open Space and Conservation Element of the Jackson General Plan contains area standards for neighborhood parks and playgrounds per population, including if adjoining to a public school. The Jackson General Plan asserts the service ratio goal of providing 2 acres of park per 1,000 population, with a minimum size of 5 acres if adjoining a public school or 10 acres when separate from a school ground (Jackson 1987).

Currently, the City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals, policies, and actions related to public parks and recreation facilities are outlined here (Jackson 2023).

- **Policy LU 2.6:** Require new development to pay their fair share of cost for providing public services in accordance with the City's Development Code and encourage the provision of open space, parks, or recreation facilities within reasonable walking distance (one-half mile) of all residences.
- **Policy LU 7.3:** Promote broad and balanced civic participation to ensure that affected residents and interested groups or individuals have the opportunity to meaningfully participate in the decision-making process, including on decisions that affect their health and well-being such as planning, roadway, parks, infrastructure, and utility projects**.**
- **Goal COS-2:** Ensure the provision of a diverse and comprehensive system of high-quality parks, trails, recreation facilities, and recreational programs and services that meet the needs of all segments of the community.
- **Policy COS 2.1:** Ensure the provision of sufficient land that is well distributed and interconnected throughout the community for parks, trails, and recreation facilities.
- **Policy COS 2.3:** Strive to achieve and maintain an overall citywide ratio of 5 acres of parkland for every 1,000 residents.
- **Policy COS 2.5:** Promote the development of a diverse network of parks, trails, and recreation facilities that support traditional and nontraditional recreational uses, and passive recreational opportunities.
- **Policy COS 2.6:** Encourage the provision and dedication of parkland within future development projects in order to ensure that the City maintains an extensive network of neighborhood parks that serve all areas of the community.
- **Policy COS 2.8:** Develop new parks, trails, and recreation facilities through developer fees in areas which are accessible and convenient to the community, prioritizing areas that are lacking these facilities
- **Policy COS 2.9:** Continue to require new residential development to pay park impact fees to use for the acquisition and development of parkland and recreational facilities, and update the fees periodically to ensure they reflect current costs of land acquisition.

Ione General Plan

The Conservation and Open Space Element of the Ione General Plan identifies the ways to protect, maintain, and enhance existing natural resources, open space and natural recreational areas, as well as to create additional areas for the enjoyment of residents and the protection of the environment (Ione 2009). The Ione General Plan asserts the service ratio goal of providing a minimum of 5 acres of park per 1,000 population for all new residential development. Policies to promote a system of public parks and recreation facilities that would meet the needs of all Ione residents include:

- **Policy CO-8.1:** Review all proposals for new residential development to ensure each project complies with the City's standards for parkland dedication. All park lands designated for parks or recreational use shall be reviewed by the City to determine adequacy for parks use

- **Policy CO-8.2:** Ensure that adequate and reliable funding sources are established for the long-term maintenance of parks and trails.
- **Policy CO-8.3:** Work towards the creation of a complete network of trails and pathways connecting major areas of the city, which is accessible for all residents.

Sutter Creek General Plan

The Parks and Recreation Element of the Sutter Creek General Plan establishes a comprehensive program to ensure adequate public parks and trails are developed as the City grows (Sutter Creek 2019). The Sutter Creek General Plan asserts the service ratio goal of providing a ratio of 5 acres of park per 1,000 Sutter Creek residents for new residential development projects.

Policies to promote a full range of parks, recreation facilities, and walking paths include:

- **Policy PR-1.1.2:** New residential developments shall provide land and/or funding for parks and recreational facilities.
- **Policy PR-1.1.4:** School recreational facilities should remain available for public use when not being occupied by school functions.
- **Policy PR-1.1.7:** Neighborhood parks should be located within walking distance of the residences they are intended to serve.
- **Policy PR-1.1.9:** The City shall adopt a bicycle and pedestrian transportation plan and funding mechanism that includes an interlinking citywide network of pedestrian walking paths and bicycle trails should be established to provide connectivity between residential communities and the downtown area and to supplement the circulation system, especially in areas where sidewalks, paths, and bicycle shoulders are inadequate or unsafe.

5.14.1.2 EXISTING CONDITIONS

City of Jackson

The City of Jackson owns and operates four park facilities—Detert Park (6.5 acres), Petkovich Park, Tailing Wheels Park, and Gold Ridge Park (Jackson 2023). The amenities at these parks include a municipal pool, youth baseball diamond and play structure, and other amenities. The City is also working with environmental agencies to open the 155-acre Oro De Amador property for public recreational access (Jackson 2023).

Argonaut High School Campus

Argonaut HS includes a gymnasium, tennis courts, softball/baseball fields, and a football field for its students.

City of Ione

The City of Ione operates the following six parks that include various amenities (Ione 2023a through 2023f):

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- Howard Park
  - 4 regulation size soccer fields/snack shack, restrooms, and play structure
  - 4 regulation baseball fields/t-ball field/snack shack and restrooms
  - 1 mile track
  - Picnic hill with play structure and picnic tables
  - Evalynn Bishop Hall
  - Horse shoe pit
  - Equestrian arena and stables
  - Skate park
  - Dry camping

- Perry Early Park
  - Open lawn area
  - Shaded play structure
  - Fire engine play structure
  - Picnic benches

- Oakridge Circle Park
  - Open green area
  - Play structure
  - Swings

- Grover Park
  - Open green area
  - Play structure
  - Swings
  - Baseball diamond

- Train Park
  - Play structure
  - Swings
  - Picnic tables
  - Iron Ivan steam engine

- Skate Park
  - Skate facilities (bowl, pyramid, quarter pipe, flat box, rail, and hubba)
  - Picnic area and green space
  - Play structure
  - Restrooms
  - Dry camping

Ione Junior High School Campus

Ione Junior HS has a pool, hard courts, play structures, and basketball courts for use by its students.

City of Sutter Creek

There are two parks in Sutter Creek—Bryson Park (1.5 acres), which includes a picnic area, play structure, basketball court, and volleyball court, and Minnie Provis Park (2.5 acres), which includes Cribbs field, a playground, BBQs, and picnic area (ACRA 2023).

Sutter Creek Elementary School Campus

Sutter Creek ES includes play structures and hardcourts on campus.

5.14.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project:

PS-3 Result in a substantial adverse physical impact associated with the provisions 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 parks.

R-1 Would 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.

R-2 Includes recreational facilities or requires the construction or expansion of recreational facilities which might have an adverse physical effect on the environment.

5.14.3 Plans, Programs, and Policies

There are no applicable plans, programs, or policies pertaining to recreational facilities.

5.14.4 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.14-1: The proposed project would not generate additional residents nor students that would increase the use of existing park and recreational facilities that could cause a substantial physical deterioration of the facility to occur or be accelerated. [Threshold R-1]

Argonaut High School Site Improvements

Typically, residential projects increase the demand for park and recreational facilities. As discussed in Chapter 5.13, *Population and Housing*, the proposed project would not induce population growth within the City of Jackson; the proposed project would accommodate existing students from within ACUSD's service boundary.

The proposed project would renovate and expand the existing gymnasium locker room that would support onsite physical education and scholastic sports onsite. Because the proposed project would not induce population growth, students are expected to use parks and recreational facilities near their existing residences and/or facilities at Argonaut HS. While some students may go to parks and recreational facilities around Argonaut HS, such use of the facilities would be expected to be on a short-term basis, after school, and not to a degree that would cause substantial physical deterioration to the park and/or recreational facility. Because the proposed project is a school project that would not induces population growth and facilities for use by its students would be provided onsite, the proposed project would not generate a substantial increase in demand for existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, impacts would be **less than significant**.

Ione Junior High School Site Improvements

Typically, residential projects increase the demand for park and recreational facilities. As discussed in Chapter 5.13, *Population and Housing*, the proposed project would not induce population growth within the City of Ione; the proposed project would accommodate existing students from within ACUSD's service boundary. The proposed project would construct a new playground for preschool, TK, and Extended Learning; a new play structure; and hardcourt areas that would support onsite physical education and scholastic recreational uses onsite. Because the proposed project would not induce population growth, students are expected to use parks and recreational facilities near their existing residences and/or facilities at Ione Junior HS. While some students may go to parks and recreational facilities around Ione Junior HS, such use of the facilities would be expected to be on a short-term basis, after school, and not to a degree that would cause substantial physical deterioration to the park and/or recreational facility. Because the proposed project is a school project that would not induce population growth and facilities for use by its students would be provided onsite, the proposed project would not generate a substantial increase in demand for existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

Typically, residential projects increase the demand for park and recreational facilities. As discussed in Chapter 5.13, *Population and Housing*, the proposed project would not induce population growth within the City of Sutter Creek; the proposed project would accommodate existing students from within ACUSD's service boundary. Because the proposed project would not induce population growth, students are expected to use parks and recreational facilities near their existing residences and/or facilities at Sutter Creek ES. While some students may go to parks and recreational facilities around Sutter Creek ES, such use of the facilities would be expected to be on a short-term basis, after school, and not to a degree that would cause substantial physical deterioration to the park and/or recreational facility. Because the proposed project is a school project that would not induce population growth and facilities for use by its students would be provided onsite, the proposed project would not generate a substantial increase in demand for existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated. Therefore, impacts would be **less than significant**.

Level of Significance Before Mitigation: *Less than Significant Impact.*

Impact 5.14-2: Project implementation would not require the construction or expansion of recreational facilities nor result in the need for a new or physically altered park which might have an adverse physical effect on the environment. [Thresholds PS-3 and R-2]

Argonaut High School Site Improvements

The proposed project includes building and site improvements at the existing Argonaut HS campus to accommodate the increase in enrollment capacity. Related to recreational uses, the proposed project would expand the gymnasium locker rooms that would be developed on the campus as part of the scope of the proposed project. The construction of the expanded locker rooms is evaluated throughout Chapter 5, *Environmental Analysis,* of this DEIR. Typically, residential projects result in an increased demand for recreational facilities. The proposed project would not induce population growth and would not require the construction, expansion, or alternation of new or existing parks or recreational facilities which might have an adverse physical effect on the environment. Therefore, impacts would be **less than significant**.

Ione Junior High School Site Improvements

The proposed project includes site improvements at the existing Ione Junior HS campus to accommodate the increase in enrollment capacity. Related to recreational uses, the proposed project would construct a new playground for preschool, TK, and Extended Learning; a new play structure; and hardcourt areas. The construction of these facilities is evaluated throughout Chapter 5, *Environmental Analysis,* of this DEIR. Typically, residential projects result in an increased demand for recreational facilities. The proposed project would not induce population growth and would not require the construction, expansion, or alternation of new or existing parks or recreational facilities which might have an adverse physical effect on the environment. Therefore, impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

The proposed project includes site improvements at the existing Sutter Creek ES campus to accommodate the increase in enrollment capacity. Related to recreational uses, the proposed project would not result in the construction of additional recreational facilities onsite. Typically, residential projects result in an increased demand for recreational facilities. The proposed project would not induce population growth and would not require the construction, expansion, or alternation of new or existing parks or recreational facilities which might have an adverse physical effect on the environment. Therefore, impacts would be **less than significant**.

Level of Significance Before Mitigation: Impact 5.14-2 would be less than significant.

5.14.5 Mitigation Measures

No mitigation measures are required.

5.14.6 Level of Significance After Mitigation

Impacts would be less than significant.

5.14.7 Cumulative Impacts

The area considered for cumulative impacts to park and recreational facilities is Amador County. The proposed project would not result in population growth in the county, and therefore would not contribute to a cumulative impact. The proposed project would not result in a substantial increase in the use of parks and recreational facilities in the county because the campuses have facilities on-site that can be used for students' recreational needs. The proposed project would not induce substantial population growth; the students of the proposed project would be existing students from within ACUSD's service boundary. The proposed project and cumulative projects would not combine to result in population growth, which may increase the demand for recreational facilities and services. The proposed project would not result in a cumulatively considerable impact, and cumulative impacts related to recreation would be less than significant.

5.14.8 References

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5.15 TRANSPORTATION

This section of the draft environmental impact report (DEIR) evaluates the potential for implementation of the School Closure/Consolidation Program Project to result in transportation impacts in the City of Jackson, the City of Ione, and the City of Sutter Creek. The analysis in this section is based on the following technical report(s):

- *Amador County School Consolidation EIR – CEQA Memorandum – Draft 2*, Kittelson & Associates, December 4, 2023

A complete copy of this study is in the technical appendices to this Draft EIR (Appendix J).

In addition, a level of service analysis was prepared for the proposed project following the NOP scoping process and feedback from the community. However, with the passage of Senate Bill 743 and under the new CEQA Guidelines, LOS metrics may no longer constitute the basis for determining transportation impacts under CEQA. The DEIR evaluates the effects of the proposed project on vehicle miles traveled (VMT). A copy of this "Traffic Operations Memorandum" prepared by Kittelson & Associates is included as appendix K to this DEIR for informational purposes.

5.15.1 Environmental Setting

5.15.1.1 REGULATORY BACKGROUND

State, regional, and local laws, regulations, plans, or guidelines related to transportation that are applicable to the proposed project are summarized in this section.

State

Senate Bill 743

On September 27, 2013, Senate Bill (SB) 743 was signed into law. The legislature found that with the adoption of SB 375, the state had signaled its commitment to encourage land use and transportation planning decisions and investments that reduce VMT and thereby contribute to the reduction of greenhouse gas (GHG) emissions, as required by Assembly Bill (AB) 32. Additionally, AB 1358, described subsequently, requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users.

SB 743 started a process that fundamentally changes transportation impact analysis as part of California Environmental Quality Act (CEQA) compliance. These changes include the elimination of auto delay, level of service (LOS), and similar measures of vehicular capacity or traffic congestion as the basis for determining significant impacts in many parts of California (if not statewide). 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" (California Public Resources Code section 21099[b][1]). On January 20, 2016, the Governor's Office of Planning and Research (OPR) released proposed revisions to its CEQA Guidelines for the implementation of SB 743. OPR developed alternative metrics and thresholds based on VMT. The guidelines were certified by the Secretary of the Natural Resources Agency in December

2018, and automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, shall not be considered a significant impact on the environment. As of July 1, 2020, lead agencies are required to consider VMT as the metric for determining transportation impacts under CEQA. The guidance provided relative to VMT significance criteria is focused primarily on land use projects, such as residential, office, and retail uses. However, as noted in the updated CEQA Guidelines Section 15064.3, agencies are directed to choose metrics that are appropriate for their jurisdiction to evaluate the potential impacts of a project in terms of VMT.

Assembly Bill 1358: The California Complete Streets Act

The California Complete Streets Act (AB 1358) of 2008 was signed into law on September 30, 2008. Beginning January 1, 2011, AB 1358 requires circulation elements to address the transportation system from a multimodal perspective. The bill states that streets, roads, and highways must "meet the needs of all users in a manner suitable to the rural, suburban, or urban context of the general plan." Essentially, this bill requires a circulation element to plan for all modes of transportation where appropriate, including walking, biking, car travel, and transit.

The Complete Streets Act also requires circulation elements to consider the multiple users of the transportation system, including children, adults, seniors, and the disabled. AB 1358 tasks the OPR to release guidelines for compliance, which are so far undeveloped.

Regional

Amador County Transportation Commission

The Amador County Transportation Commission (ACTC) was designated as the Regional Transportation Planning Agency (RTPA) for the Amador County Region including Amador County and the cities of Jackson, Ione, Sutter Creek, Plymouth, and Amador City. As the state designated RTPA for Amador County, the ACTC's primary responsibilities encompass the following areas:

- Transportation Planning
- Transportation Programming
- Transportation Development Act Administration
- Project Development and Delivery
- Traffic Impact Analysis and Mitigation

The purpose of the RTPA is to identify the region's short-term and long-range transportation needs and to establish policies, programs, and projects designed to meet those needs.

Regional Transportation Plan

Every RTPA is required to conduct long-term planning. The Amador County Regional Transportation Plan (RTP) serves as a crucial policy document tailored to the unique needs and characteristics of each region (Amador County 2020). It helps shape the region's economy, environment, and social future, and communicates

this regional vision to the state and federal government. The RTP should also align with statewide goals related to transportation, environmental sustainability, economic advancement, and social fairness.

- **Goal 1A:** Implement improvements to all modes of transportation that are needed to reduce congestion and improve mobility, optimize connectivity, enhance safety, preserve existing infrastructure, communities, and environment, and support socio-economic development throughout the region.
- **Goal 1B:** Integrate improvements to all modes of transportation in a way that supports Amador County's economic development and enhances the integrity of its rural character, communities, and environment.
- **Policy 1A:** The ACTC will actively help implement a diverse program of improvements across each mode of transportation that can help meet all of the region's transportation needs to the greatest extent possible.
- **Policy 1B:** ACTC recommends that the cities and county require new development to provide onsite facilities or otherwise contribute toward offsite facilities that can help minimize or otherwise mitigate their traffic impacts by encouraging people to walk, bike, use transit, rideshare, or otherwise reduce their reliance on private automobile.
- **Policy 2C:** ACTC recommends that the cities and county require new development within their jurisdictions that may have potentially significant traffic impacts on the regional transportation system to be fully analyzed by a project-specific traffic impact study or by a traffic impact study performed for a General Plan circulation element, provided that it is adequate and accurate in detail.
- **Policy 2F:** ACTC recommends that the cities and county require new developments within their jurisdictions to fully mitigate their potential traffic impacts based on the categories below.
  - New development should pay the full cost of any improvements that it would create the need for and that would not otherwise be required in order to maintain public safety or achieve the RTP's adopted level of service goals.
  - Should new development projects trigger the need for improvements to existing facilities prior to project occupancy or should new developments create the need for a new improvement prior to project occupancy, the development should construct respective improvements in order to maintain public safety. The cities and county should determine if the new development may be eligible for reimbursement if the cost of implementing the improvement exceeds the project's required mitigation.
  - New development should pay the Regional Traffic Mitigation Fee if it would contribute an impact to any Tier I improvement in the RTP.
  - New development should pay its fair share toward the cost of any Tier II improvement in the RTP that it would contribute an impact to. For such cases, any fair share payments required of new development should be directly proportional to the traffic impacts it creates, capacity it consumes, and/or additional delay it creates.

- **Goal 6A:** Improve opportunities for bicycle and pedestrian travel by providing a safe, functional, and convenient network of non-motorized transportation facilities throughout the region.
- **Goal 6B:** Fulfill the mobility needs of pedestrians and bicyclists in a manner that reduces pedestrian/bicycle/vehicle safety conflicts, improves modal connectivity, and enhances community character.
- **Policy 6A:** The ACTC will help the county, and Caltrans to implement the Goals, Policies, and Objectives identified in the adopted Amador Countywide Pedestrian and Bicycle Transportation Plan.
- **Policy 6B:** ACTC recommends that the cities and county incorporate planned pedestrian and bicycle improvements with any updates to their General Plan Circulation Elements, transportation Capitol Improvement Programs, and local building standards.
- **Policy 6C:** The ACTC will help the cities, county, and Caltrans to incorporate planned pedestrian and bicycle improvements with the development and delivery of regional roadway projects identified in the RTP, city/county General Plan Circulation Elements, and transportation Capital Improvement Programs, and Caltrans' State Highway Operation and Protection Program (SHOPP) to the greatest extent feasible.
- **Policy 6D:** ACTC recommends that the cities, county, and Caltrans incorporate planned pedestrian and bicycle improvements such as shoulder widenings with development and delivery of their roadway improvement projects.

Amador Countywide Pedestrian and Bicycle Plan

The Amador Countywide Pedestrian and Bicycle Plan is an effort by the ACTC in coordination with other member agencies to update the 2006 Amador Countywide Pedestrian and Bicycle Plan with the goal to make walking and biking safer and easier in Amador County. The plan serves two purposes: to be the foundation for the pedestrian and bicycle component of the RTP and to organize high priority pedestrian and bicycle projects among Amador County's member agencies.

An Active Transportation Plan or Pedestrian and Bicycle Plan must be coordinated with neighboring jurisdictions and be consistent with local and regional transportation plans. This plan has been prepared under the guidance of ACTC's member agencies including Amador City, city of Sutter Creek, city of Jackson, city of Plymouth, city of Ione, and Amador County. The goals of this plan include the following:

- **Goal 1:** Promote an efficient network of bikeways and pedestrian facilities throughout Amador County.
- **Goal 2:** Improve bicyclist and pedestrian safety and security.
- **Goal 3:** Integrate pedestrian and bicycle needs into transportation planning activities and support local planning efforts to encourage and increase walking and biking.

- **Goal 4:** Maximize capacity for implementation of pedestrian and bicycle projects, programs, and plans.

Amador County 2016 General Plan

Amador County 2016 General Plan allows the county to control, to the degree possible, its own destiny in achieving the objectives outlined in the plan. The General Plan forges links between land use and the countywide transportation, infrastructure, and public service networks. It offers the necessary flexibility to accommodate growth and change while effectively managing the county's wealth of natural resources. Comparable to a roadmap toward a brighter future, Amador County's General Plan encapsulates a contemporary description of the county, an aspirational vision, and a navigable path expressed through goals, policies, and implementation strategies to realize the vision. The General Plan clarifies and articulates the county's intentions in responding to the expectations of residents, landowners, and businesses, regarding their long-term vision for the county. To achieve comprehensiveness, the General Plan must address many issues that influence land use decisions. Specifically, State law requires the county to develop a plan for land use, circulation, housing, resource conservation, open space, noise, and public safety.

The Circulation and Mobility Element outlines a plan for efficient and safe transportation of people and goods in Amador County. The Element contains goals, policies, and implementation programs that establish the county's circulation system to accommodate pedestrians, bicycles, motor vehicles, public transit, and other means of travel. Together, the policies, implementation programs, and diagrams are intended to ensure transportation connectivity between incorporated cities.

- **Goal CM-1:** Maintain adequate regional and local transportation facilities.
- **Policy CM-1.3:** Plan for future maintenance and expansion of roadway, trail, and other circulation infrastructure on an annual basis, factoring for changes in funding and project priority or feasibility.
- **Policy CM-1.4:** Encourage greater connectivity on local roads and improve the connections between unincorporated communities. Ensure multiple routes are available between communities wherever possible.
- **Policy CM-1.5:** Regional traffic should be directed around the historic centers of established communities where feasible.
- **Goal CM-2:** Maintain a safe, efficient, and comprehensive traffic circulation system.
- **Policy CM-2.1:** Plan, build, and maintain a multi-modal and hierarchical transportation system.
- **Policy CM-2.2:** Identify key roads and intersections with historical or projected traffic congestion and/or safety problems and apply creative management measures to improve circulation.
- **Policy CM-2.4:** Maintain a Traffic Impact Fee program whereby new transportation needs (including bicycle and pedestrian needs) generated by new development are paid for by the development on a

fair-share basis. Increased roadway capacity should be funded through developer fees to the extent legally possible.

- **Goal CM-3:** Provide transportation alternatives to the automobile.
- **Policy CM-3.1:** Identify priorities for the expansion of bicycle and pedestrian transportation that respect the rights of private property owners.
- **Policy CM-3.2:** The county will seek funding and include pedestrian and bicycle facilities in Capital Improvements Planning, as feasible. These improvements should connect residents to communities, activity centers, and adjacent developments, and offer an alternative to automobile transportation.
- **Policy CM-3.4:** Consider transportation needs in the context of new development proposals. Promote land use patterns which place residents near activity centers and essential services to reduce the need for frequent automobile travel.
- **Policy CM-3.5:** Coordinate with Amador Transit and other agencies to improve the availability of public transit connecting residents to services.
- **Policy CM-3.6:** Coordinate with Amador Transit to continue to provide public transportation from Amador County to regional job and activity centers located outside the county.
- **Policy CM-3.7:** The county will work cooperatively with Caltrans and local jurisdictions to identify priority alternative transportation improvements for bicycles, pedestrians, and transit users for state routes that intersect cities and towns and serve as main streets for these communities.
- **Goal C-9:** Maintain and improve air quality.
- **Policy C-9.6:** Maintain viable public transportation options in Amador County and provide transit connections such as park-and-ride services to job centers in nearby counties.
- **Goal C-10:** Reduce GHG emissions associated with automobile travel, electrical power generation and energy use.
- **Policy C-10.3:** Guide new development to areas where pedestrian and bicycle access to existing activity centers is possible, in order to reduce the need for automobile travel and VMT.
- **Policy C-10.4:** Work with service providers to ensure that transit offerings in the county are stable or expanding, and that transit is tailored to meet residents' needs.
- **Goal N-2:** Minimize noise conflicts from transportation sources.
- **Policy N-2.4:** Encourage the use of alternative transportation modes such as walking, bicycling, and mass transit to minimize traffic noise.

Local

City of Ione Municipal Code

Ione Municipal Code provides regulations for the city that relate to transportation. Title 10, *Vehicles and Traffic*, focuses on parking, bicycles, and street usage. Title 17, *Zoning,* identifies development and land use standards including parking requirements.

City of Ione General Plan

The Circulation Element of the Ione General Plan (Ione 2009) identifies goals, objectives, and policies pertaining to the City's circulation system. The following are applicable to the proposed project:

- **Goal CIR-1:** Develop and roadway system that:
  1. Accommodates future land use at the city's desired level of service.
  2. Coexists with other travel modes, including biking, walking, and golf carts.
  3. Protects residential areas from excessive traffic.
  4. Contributes to the quality, safety, and connectivity of the city's residential, Downtown, commercial, office, and industrial areas.

- **Policy CIR-1.1:** Implement the Circulation Plan.

- **Policy CIR-1.5:** Encourage the creation of a road system that is easily navigated.

- **Policy CIR-1.6:** Where existing intersections cause traffic flow delays, consider modifying such intersections to round-about intersections if such improvements would improve traffic flows and livability.

- **Goal CIR-2:** Establish an extensive, complete, smooth, interconnected, and continuous pedestrian and bicycle network that is a safe and attractive option for local trips or recreation and that connects the City's neighborhoods, parks and schools, employment areas, and retail centers.

- **Policy CIR-2.1:** Create a system of sidewalks, off-street trails and multi-use paths that are used for walking, bicycling, and equestrian use that are attractive, natural, and safe transportation corridors.

- **Policy CIR-2.2:** Consider how all plans and projects affect all modes of transportation, including bicyclists and pedestrians.

- **Policy CIR-2.5:** Provide sidewalks throughout the city. Meandering sidewalks are discouraged, except where necessary to accommodate site-specific features such as trees or habitat.

- **Policy CIR-2.6:** Provide safe and convenient bicycle access to all parts of the community.

- **Policy CIR-2.7:** Provide bike lanes or other bike facilities along all arterials, connectors, and on local roadways when necessary and feasible to provide interconnected routes. On-street bike routes may be provided on roadways as deemed necessary by the city.

- **Policy CIR-2.8:** Promote bicycling and walking as a safe and attractive activity. Educate all road users to share the road and interact safely.
- **Policy CIR-3.5:** Require proposed new development projects to analyze their contribution to increased traffic and to implement improvements necessary to address their impact on facilities not covered by a fee program.
- **Policy CIR-3.7**: Continue participation in the Safe Routes To School Program to help fund pedestrian and bicycle improvements that provide routes to schools.
- **Goal CIR-4:** Provide a circulation system that is properly maintained and maximizes safety for all users.

City of Jackson Municipal Code

Jackson Municipal Code provides regulations for the city that relate to transportation. Title 10, *Vehicles and Traffic*, focuses on intersections and parking regulations. Title 17, *Development Code,* includes the zoning districts and allowable land uses and development standards for ensuring adequate circulation.

City of Jackson General Plan

The Circulation Element of the Jackson General Plan (Jackson 2008) identifies goals, objectives, and policies pertaining to the City's circulation system.

- **Goal 2:** To promote effective transport of goods and safe and efficient movement of all segments of the population.
- **Objective 2.A:** To minimize traffic and congestion in the City of Jackson.
- **Policy 2.A.3**: The City shall require that new development's internal circulation plans include provisions for pedestrians, bicycles, automobiles, parking, and bus facilities as well as Neighborhood Electric Vehicles (NEVs) consistent with separately adopted alternative transportation plans and/or guidelines.
- **Policy 2.A.5**: All road facilities shall be constructed or upgraded to acceptable safety standards where practical and economically feasible.
- **Policy 2.A.8**: New developments shall be required to mitigate costs for the off-site indirect impacts or cumulative impacts generated by the new traffic they add to the existing circulation system.
- **Goal 4:** To preserve and enhance the character of scenic and historic routes through the community.
- **Objective 4.A:** To preserve, enhance, and protect from degradation by new development scenic and historic.
- **Policy 4.A.1:** Views along designated scenic routes shall not be degraded.

- **Policy 4.A.2**: New development along scenic or historic routes shall be required to incorporate visual aesthetics into the design of transportation facilities.
- **Goal 5:** Provide effective and efficient public transportation and reduce automobile dependency.
- **Objective 5.A:** To participate in the planning and implementation of transit services that are timely, cost-effective and responsive to the area's growth patterns and existing and future transit demand.
- **Policy 5.A.1**: The City shall encourage alternatives to single-occupant vehicle trips and make alternatives available to the extent deemed practical and economical.
- **Policy 5.A.2:** The City shall require new development to construct or contribute financially for transit facilities, as deemed necessary, for purposes of public convenience and fuel conservation, and to ensure transportation for the elderly and disabled.
- **Goal 6**: To provide a safe, comprehensive and integrated circulation system for non-motorized transportation.
- **Objective 6.A:** To make bicycle and pedestrian travel an integral part of the City's circulation system.
- **Policy 6.A.1:** The City shall construct sidewalks or pedestrian walkways along Highways 49 and 88.
- **Policy 6.A.2**: The City shall continue to require new development to construct sidewalks or meandering walkways along all street perimeters.
- **Policy 6.A.3**: The City shall promote use of walking routes, walkways and hiking trails.
- **Policy 6.A.5**: The City shall encourage walking tours throughout the City through the use of signage designating points of interest.
- **Objective 6.B:** To encourage bicycle usage as an energy-efficient, recreational mode of transportation.
- **Policy 6.B.1:** The City shall eliminate barriers to bicycle traffic within selected areas.
- **Policy 6.B.2:** Bicycle lanes shall be constructed along new or reconstructed arterial and collector routes in, or adjacent to, the City wherever possible.
- **Policy 6.B.3:** The City shall require new development to construct bicycle routes and/or provide secure facilities (i.e. bike racks), where feasible.
- **Policy 6.B.4**: The City shall encourage existing businesses and employers to provide bicycle storage and lockers in order to promote bicycle commuter travel.
- **Policy 6.B.5**: The City shall promote bicycle safety awareness and the responsibilities of cyclists.

- **Policy 6.B.6**: The City shall continue to encourage the coordination of bicycle use with mass transit by equipping all buses with bicycle racks.

The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals, objectives, policies, and actions related to the City's circulation system are outlined here (Jackson 2023).

- **Goal CIRC-2**: To promote effective transport of goods and safe and efficient movement of all segments of the population.
- **Objective 2.A**: Minimize traffic and congestion in the City of Jackson.
- **Policy CIRC 2.3**: The City shall require that new development's internal circulation plans include provisions for pedestrians, bicycles, automobiles, parking, and bus facilities as well as Neighborhood Electric Vehicles (NEVs), if deemed feasible and beneficial, consistent with separately adopted alternative transportation plans and/or guidelines.
- **Policy CIRC 2.4**: The City shall require that rights-of-way be sufficient to ensure adequate area for future expansion to accommodate long-range planning options shown in the Circulation Diagram.
- **Policy CIRC 2.5**: All road facilities shall be constructed or upgraded to current design standards where practical and feasible.
- **Policy CIRC 2.7**: New development plans which generate a direct need for new off-site roadways, road widening or upgraded intersection improvements, traffic controls or other similar improvements shall be required to construct the needed improvements to City standards as part of project approval and construction.
- **Policy CIRC 2.12**: The City shall continue to participate in the Regional Traffic Mitigation Fee (RTMF) Program operated by ACTC. This program, whose revenues are derived from fees paid by new land development, helps fund various transportation improvements throughout Amador County.
- **Policy CIRC 2.18**: Consider all modes of travel in planning, design, and construction of all transportation projects to create safe, livable, and inviting environments for pedestrians, bicyclists, motorists, and public transit users of all ages and capabilities.
- **Policy CIRC 3.4**: The City shall minimize potential conflicts between trucks and pedestrian, bicycle, transit, and vehicle access and circulation on streets with truck travel.
- **Goal CIRC-5**: Provide effective and efficient public transportation to reduce automobile dependency.
- **Objective 5.A**: To participate in the planning and implementation of transit services that are timely, cost-effective and responsive to the area's growth patterns and existing and future transit demand.

- **Policy CIRC 5.1**: The City shall encourage alternatives to single-occupant vehicle trips and make alternatives available to the extent deemed practical and economical.
- **Policy CIRC 5.2**: The City shall require new development to construct or contribute financially for transit facilities, as deemed necessary, for purposes of public convenience and fuel conservation, and to ensure transportation for the elderly and disabled.
- **Policy CIRC 5.3**: The City shall promote ridesharing and the use of park-and-ride facilities.
- **Goal CIRC-6**: To provide a safe, comprehensive and integrated circulation system for non-motorized transportation.
- **Policy CIRC 6.3**: The City shall continue to require new development to construct sidewalks or meandering walkways along all street perimeters.
- **Policy CIRC 6.8**: Bicycle lanes shall be constructed along new or reconstructed arterial and collector routes in, or adjacent to, the City, wherever possible.
- **Policy CIRC 6.9**: The City shall require new development to construct bicycle routes and/or provide secure facilities (i.e. bike racks), where feasible. To encourage biking and walking, provide amenities including pedestrian-scale lighting, bicycle parking, shade trees, and landscaping.
- **Policy CIRC 6.12**: The City shall continue to encourage the coordination of bicycle use with mass transit by equipping all buses with bicycle racks.
- **Goal CIRC-8**: Plan for the future in a way that reduces the environmental impacts of transportation.
- **Policy CIRC 8.1**: Support land use with increased densities and mixed uses, consistent with the Land Use Element, to reduce vehicle miles traveled (VMT) and promote the use of walking, biking, and transit.
- **Policy CIRC 8.4**: Support the creation of electric vehicle charging stations at commercial, government, and other employment and community destinations.

City of Sutter Creek Municipal Code

Sutter Creek Municipal Code provides regulations for the city that relate to transportation. Title 11, *Vehicles and Traffic*, focuses on parking regulations and pedestrian access. Title 18, *Zoning Ordinance,* includes the procedures and standards for new or changed development.

City of Sutter Creek General Plan

The Circulation Element of the Sutter Creek General Plan (Sutter Creek 2019) identifies goals, objectives, and policies pertaining to the City's circulation system. The following are applicable to the proposed project:

- **Goal C-1:** The primary goal of the city of Sutter Creek Circulation Element is to ensure that public safety and adequate levels of service are maintained through a variety of available modes of transportation as the City grows.
- **Objective C-1.2:** The provision of traffic signals at intersections where warranted and feasible.
- **Objective C-1.3:** The provision of necessary street improvements, where and when appropriate, for existing streets and in new development projects.
- **Policy C-1.4.1:** Provide improvements at intersections to improve safety and traffic flow as conditions warrant.
- **Objective C-1.5:** The provision of new streets that meet City standards, where and when appropriate.
- **Policy C-1.5.6:** Road sections shall have curbs and gutters or alternative drainage facilities adequate for receiving stormwater runoff from roadway surfaces. New roadway sections shall include sidewalks or pedestrian routes that provide safe and efficient pedestrian access. Sidewalks are preferred but may be deleted in an effort to minimize grading if an alternative is provided for pedestrian use that meets the satisfaction of the Planning Commission or City Council.
- **Policy C-1.5.7:** Multiple ingress and egress options should be provided through new development projects for safety purposes.
- **Policy C-1.5.8:** Neighborhood streets should be curvilinear and follow existing contours to the greatest extent feasible.
- **Policy C-1.5.9:** Neighborhood streets shall be protected from high traffic counts by not allowing large or accumulated developments from relying on them for access.
- **Objective C-1.6:** Increased use of public transit.
- **Policy C-1.6.1:** Maximize the use of public transit to reduce dependence on the private automobile.
- **Policy C-1.6.2:** The city shall request that the Amador County Transportation Commission (ACTC) and Amador Regional Transit System (ARTS) review and comment upon new projects that may generate or attract, individually or cumulatively, large, or moderate volumes of traffic. ACTC's roles and responsibilities involve two overlapping categories: (1) administration of Transportation Development Act and other funds that are allocated to ACTC, and (2) to serve as the Regional Transportation Planning Agency for Amador County. ARTS serves as the local transit system for Amador County.
- **Policy C-1.8:** Increased use of carpooling and ridesharing.
- **Policy C-1.8.1:** The City should encourage carpooling.
- **Objective C-1.9:** Increased use of staggered work hours.

- **Policy C-1.9.1:** The City encourages employers to provide staggered work hours for employees. Staggered work shifts can spread out and reduce peak hour traffic.
- **Objective C-1.10:** Increased provision of bicycle and pedestrian facilities.
- **Policy C-1.10.2:** When required for pedestrian access to public services and facilities, the City shall require development projects to construct pedestrian walks.

5.15.1.2 EXISTING CONDITIONS

State Routes

Argonaut HS is primarily accessed via State Route (SR) 88 to the north and northeast and SR 49 to the east. Ione Junior HS is accessed primarily via SR 124 and SR 104. Sutter Creek ES is accessed via SR 49 to the west.

State Route 88

SR 88, also known as the Carson Pass Highway, is a five-lane highway with a speed limit of 45 miles per hour within the city limits. Outside the city limit, SR 88 is a two-lane highway with a speed limit of 55 miles per hour. It provides a connection to Stockton and the San Joaquin Valley. There are limited sidewalks when passing east of Argonaut HS. The route passes through several farms, vineyards, and orchards along with small towns that are situated in the San Joaquin Valley. The highway runs concurrently with SR 49 through town. SR 88 separates from SR 49 and leaves Jackson following Jackson Creek and reaches the small town of Pine Grove. It also provides access to the freeway network with direct connections to State Route 41, SR 49, and SR 124. Additionally, the proposed United States Bicycle Route 50 (USBR50) pathway aligns with SR 88.

State Route 49

SR 49 is a north–south two-lane highway with a speed limit of 55 miles per hour outside the city limit. The route turns into a three-lane highway with a speed limit of 30 miles per hour within the city limits as it approaches the City of Jackson. Within the Jackson city limits, SR 49 is primarily a four-lane facility with a two-way left-turn lane (TWLTL), though the southern, downhill portion heading into downtown Jackson features a single travel lane. It passes through Sutter Hill, Martell, Jackson, and Scottsville. There are limited sidewalks when passing through these cities and no bike facilities. SR 49 briefly runs concurrently SR 88 through the town of Martell before intersecting with the eastern terminus of SR 104. Continuing its route, SR 49 travels west of Sutter Creek and Amador City. Additionally, it provides access to the freeway network, establishing direct connections to SR 88 and SR 26.

State Route 124

SR 124 is a north-south two-lane highway with a speed limit of 25 miles per hour within the city limit and 45 miles per hour outside the city limits. It enters the city of Ione from SR 16, near Plymouth, and continues south to SR 88. SR 124 continues north and turns into Church Street in the City of Ione, intersecting Buena Vista Road and passing Lake Flint along the way. It also provides access to the freeway network with direct

connections to SR 16 and SR 104. Sidewalks and crosswalks are available within the Ione city limits. However, there are no pedestrian or bike facilities along SR 124 outside the city limits.

State Route 104

SR 104 is a west-east two-lane highway between Sutter Lane and SR 88 with a speed limit of 25 miles per hour within Ione city limits and 45 mph outside the city limits. Within the city limits, SR 104 is referred to as Preston Avenue, South Ione Street, and Main Street. It connects SR 99 near Galt to SR 49 in Sutter Creek via the City of Ione. It provides a direct connection to Interstate 5 and SR 160. The route begins in Galt in Sacramento County at SR 99. It then heads eastward. The route turns northeast, passing through Herald, near Rancho Seco Nuclear Generating Station and on to the community of Clay before entering Amador County. SR 124 and SR 104 follow the same alignment through downtown Ione. Like SR 124, Sidewalks and crosswalks are available within the Ione City limits, and no pedestrian or bike facilities along SR 104 outside the city limits.

Minor Arterials

Church Street

Church Street is a two-lane north-south roadway in the City of Ione with a speed limit of 25 miles per hour near Ione Junior HS. The facility extends from Main Street on the north to SR 124 on the south with limited sidewalks and no bicycle facilities.

Main Street

Main Street is a two-lane east-west roadway also in the City of Ione with a speed limit of 25 miles per hour located near Ione Junior HS. The road spans from Old Ione-Jackson Road on the east to Sacramento Street on the west with limited sidewalks and no bicycle facilities.

Ione Street

Ione Street is a two-lane north-south roadway in the City of Ione with a speed limit of 25 miles per hour, located near Ione Junior HS. It extends from Main Street on the north to State Route 104 on the south, featuring limited sidewalks and no bicycle facilities.

Old Route 49

Old Route 49 is a two-lane north-south roadway in the City of Sutter Creek with a speed limit of 45 miles per hour. Near Sutter Creek ES, the roadway transitions into a three-lane road with a speed limit of 35 miles per hour. The facility extends from SR 49 on the west, passes through Sutter Creek and Amador City, and continues until it reaches SR 49 to the north. It has limited sidewalks within the cities, and no bicycle facilities.

Major Collectors

Hoffman Street

Hoffman Street is a two-lane roadway with a speed limit of 25 miles per hour. It extends southwest from SR 49 in the City of Jackson to Buena Vista Road near the Calaveras County line. The street is located near Argonaut HS. The street doesn't include sidewalks or bike trails.

Argonaut Lane

Argonaut Lane is a two-lane north-south roadway with a speed limit of 25 miles per hour that is located near Argonaut HS, in Jackson. It spans from SR 88 on the north to Hoffman Street on the south, featuring limited sidewalks for pedestrian use and no bicycle facilities.

Marlette Street

Marlette Street is a two-lane east-west roadway with a speed limit of 25 miles per hour near Ione Junior HS, in Ione. It extends from Buena Vista Street on the east to Dave Brubeck Road and 5 Mile Drive on the west. It has limited sidewalks available and no bicycle facilities.

Sacramento Street

Sacramento Street is a two-lane north-south roadway near Ione Junior HS, in Ione, with a speed limit of 25 miles per hour. It extends from Main Street on the north to Marlette Street on the south. The facility also has limited sidewalks for pedestrian accessibility and no bicycle facilities.

Sutter Ione Road

Sutter Ione Road is a two-lane east-west roadway near Sutter Creek ES, in Sutter Creek, with a speed limit of 25 miles per hour. It extends from Spanish Street on the east to SR 124 on the west. It has limited sidewalks near the school and no bicycle facilities.

Local Roads

Mills Street

Mills Street is a two-lane north-south local road with a speed limit of 25 miles per hour near Ione Junior HS. The roadway stretches from Jackson Street on the north to Ione Junior HS on the south. It has limited sidewalks for pedestrian use and no bicycle facilities.

Market Street

Market Street is a two-lane east-west local road also situated near Ione Junior HS. It extends from Summit Street on the east to Mills Street on the west. It has limited sidewalks and no pedestrian facilities.

Spanish Street

Spanish Street is a two-lane north-south local road near Sutter Creek ES, with a speed limit of 25 miles per hour. The roadway extends from Old Route 49 in the north to its southern end. It has limited sidewalks and no bicycle facilities.

Bicycle Facilities

Bicycle and pedestrian facilities are important components of the transportation network in the study area. They not only offer non-vehicular opportunities for both commute and recreational trips but also provide connections to the region's transit network.

Bicycle facilities are defined by the following four classes:

- **Class I**: Provides a completely separate facility designed for the exclusive use of bicyclists and pedestrians with crossing points minimized.
- **Class II**: Provides a restricted right-of-way designated lane for the exclusive or semi-exclusive us of bicycles with through travel by motor vehicles or pedestrians prohibited, but with vehicle parking and crossflows by pedestrians and motorists permitted.
- **Class III**: Provides a right-of-way designated by signs or permanent markings and shared with pedestrians and motorists.
- **Class IV**: Provides a restricted right-of-way designated lane for the exclusive use of bicyclists that is separated by a vertical element to provide further separation from motor vehicle traffic.

The only existing bicycle route in the project vicinity is a Class II Bicycle Route on Argonaut Lane, stretching from Mariposa Street to Hoffman Street near Argonaut HS in Jackson.

Public Transit

Near Argonaut HS, there are two bus stations: Courthouse and Argonaut/Westview. These stations serve as pivotal points for Routes 5 and 6. Route 5, also known as the Sutter Creek-Jackson Shuttle, follows a circular route encompassing 37 stops. It starts from the Sutter Hill Transit Center, providing a 1-hour frequency of service and operating between 9:05 AM to 3:15 PM on weekdays. Similarly, Route 6 covers 37 stops from the Sutter Hill Transit Center. This service operates on weekdays and maintains a frequency of 1 hour and 15 minutes, with operational hours extending from 7:00 AM to 4:45 PM. These two routes also serve Sutter Creek Elementary School.

Ione Jr. HS benefits from convenient access to transit facilities through two main bus stations located near the school. These stations, W. Marlette/Depot Rd. and Ione Methodist Church are strategically located along the route of Amador Bus 7, which operates as part of the Sutter Hill Transit Center network. The Route 7 bus encompasses a total of 9 stops, commencing its journey from Castle Park and concluding at The Arc. Notably, the service operates on weekdays once in the morning and once in the afternoon from 7:45 AM to 4:44 PM.

Sutter Creek ES also has easy access to transit facilities through the Amador High School-Spanish Street bus station, located 344 feet away from the school. This station serves Routes 3, 5, and 6. Route 3 includes 15 stops, starting from Sutter Hill Transit Center and ending at The Arc. Weekday service includes one morning and one afternoon trip, running from 8:15 AM to 3:10 PM.

School Bus Ridership

This District offers a free bus program for ACUSD students. Currently, approximately 32 percent of District students participate in the District bus program.

5.15.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

T-1 Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

T-2 Conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).

T-3 Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

T-4 Result in inadequate emergency services.

5.15.3 Environmental Impacts

5.15.3.1 METHODOLOGY

Schools are most similar to the way an office operates with the majority of trips coming into the office in the morning and most trips going out again in the afternoon. General practice is to assess an office project's potential effect by analyzing vehicle miles traveled per employee. The evaluation of the proposed project used a similar metric but used vehicle miles traveled per student as the efficiency metric since students are the primary generator of school vehicle trips.

There are no established significance criteria for schools, so this analysis uses no increase in the VMT per student for the impact criteria. The consolidation of the schools proposed in the project is not increasing the number of students attending the schools in the county but could potentially change how far students need to travel to reach school. Therefore, no increase in VMT per student was used as the metric for determining whether the projects will cause a significant change in VMT.

VMT per student was determined by estimating the total VMT generated by students and staff and dividing it by the number of students. Total VMT was calculated based on data supplied by ACUSD which provided home locations for students and staff. The trip distance between the home location and the schools where they worked/attended was then used to calculate total VMT. This total VMT was then divided by the number of

students and staff to determine a VMT per student plus staff under the no project condition. The students who were taking the bus to and from the school are accounted for and the trip distances for those students are zeroed out in the VMT calculations.

The VMT per student analysis was rerun similarly with the proposed consolidation plan to determine how it may change. A similar or less VMT per student meant no significant impact while an increase in VMT per student was considered a significant impact. It is assumed that the students who are currently taking the bus will be taking transit with the proposed consolidation plan.

The results of these calculations are shown in Table 5.15-1, *VMT per Student, With and Without Project*.

Table 5.15-1 VMT per Student, With and Without Project

	Total Number	Existing VMT	Existing VMT + Project	VMT Change	% Change (Increase)
Students	4,073	40,356	42,792	2,436	6.0%
Staff	382	7,848	7,938	90	1.1%
Total	4,455	48,204	50,730	2,526	5.2%
VMT per student (students + staff combined)	4,455	10.82	11.39	0.57	5.2%

Additionally, a level of service analysis (Appendix K) was prepared for the proposed project for informational purposes only. Based on comments received during the NOP scoping period, this study evaluated four intersections near Argonaut HS and four near Ione Junior HS. Intersection turning movement volumes, lane configurations, and traffic control were used to calculate the levels of service at the study intersections for the AM and School PM peak hours. LOS is no longer used as a measure of transportation impacts under CEQA. Transportation impacts, and the following analysis, will instead be evaluated based on a project's effect on VMT.

5.15.3.2 IMPACT ANALYSIS

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.15-1: The proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. [Threshold T-1]

School Closure/Consolidation Program

The proposed project includes consolidating eight campuses into six campuses. Since all improvements would be made within existing school sites with the same number of students district-wide, the proposed project would not cause conflicts with proposed programs or plans to improve the circulation system for users including the vehicles, transit, bicycles, and pedestrians. Amador County and the cities of Ione, Jackson, and Sutter Creek have general plans that guide each jurisdiction's long-term growth and vision for its future, including circulation. Further, the RTP aligns regional transportation, sustainability and land use planning. The applicable goals, objectives, and/or policies of the General Plans and RTP are summarized in Section 5.15.1.1, *Regulatory Background*. A consistency analysis is provided below.

Regional Transportation Plan

The RTP includes goals and policies aimed at reducing congestion, improving mobility, connectivity, and safety, preserving existing infrastructure, communities and the environment, and support economic development (Goals 1A and 1B). Further, the RTP includes improving pedestrian and bicyclist opportunities to promote safety and connectivity (Goal 6A and 6B). Implementation of the proposed project would reassign students to different school campuses within the District. Site improvements at Argonaut HS, Ione Junior HS and Sutter Creek ES would occur on ACUSD campuses; and pick-up/drop-off improvements would improve circulation at the campuses. The proposed project would not include off-site roadway improvements, nor bicycle and pedestrian improvements. The District would continue to provide its bus program to students. The proposed project would not conflict with the RTP's goals and policies.

Amador Countywide Pedestrian and Bicycle Plan

The Amador Countywide Pedestrian and Bicycle Plan includes four goals related to promoting an efficient bicycle and pedestrian facilities, improving safety and security, integrating pedestrian and bicycle needs in transportation planning, and maximizing the capacity for implementation of pedestrian and bicycle projects, programs, and plans. The proposed project would not include off-site bicycle and pedestrian improvements. The District would continue to provide its bus program to students. Bicycle and pedestrian access to the campuses would remain the same as existing conditions. The proposed project would not conflict with the County's pedestrian and bicycle plan.

Amador County General Plan

The Amador County General Plan includes goals and policies related to maintaining adequate regional and local transportation facilities (Goal CM-1), maintaining safe, efficient and comprehensive circulation system (Goal CM-2), and providing alternatives to automobile (Goal CM-3). The proposed project would not interfere with any future maintenance and expansion of roadway, trail, and other circulation infrastructure. Implementation of the proposed project would be limited to the campuses. The proposed project is not proposing to make modifications to any roadways in the vicinity of the schools, with the exception of a new driveway at Argonaut High School from Stony Creek Road. This new driveway would require an encroachment permit from the city of Jackson and review and approval from DSA. City of Jackson would review the design and connection of the new driveway and would ensure that the design and construction of the new driveway would not interfere with the movement of vehicles along Stony Creek Road. Therefore, the proposed project would not hinder the County's ability to maintain adequate regional and local transportation facilities. The proposed project would not interfere with the County's policy to plan, build, and maintain a multi-modal and hierarchical transportation system. The location of the schools is easily accessible through the existing transportation network, with close proximity to state routes, arterial and collector roadways, and transit stops near some of the schools. The proposed project would not interfere nor conflict with the county's priorities for the expansion of bicycle and pedestrian transportation, and transit improvements. The location of the schools is easily accessible through the existing transportation network, and thus supports the goal of building and maintaining a multi-modal transportation system. Further, the District would continue to provide school bus program to serve students, which promotes a multi-model transportation network. The campus supervisor would oversee a valet program

where campus personnel help load and unload students from vehicles and buses and control vehicles leaving the campus (metering) to allow for efficient circulation onto public streets, which would promote safety and efficient circulation.

The Amador County General Plan includes goals and policies related to maintaining and improving air quality (Goal C-9) and reducing greenhouse gas emissions associated with travel (part of Goal C-10). The proposed project's context allows for a wide range of travel modes to and from school. Additionally, ACUSD provides a busing program that would continue to operate under the project. The consolidation of schools also provides additional opportunities for carpooling and allows for a more efficient distribution of resources. Therefore, the proposed project would not hinder the County's goal to improve and maintain air quality. The proposed project does not interfere with the County's priorities for reducing GHG emissions. Related to automobile travel, while the project will increase the VMT per student, this increase does not hinder the County's ability to meet its transportation goals. The proposed project would allow for a more efficient distribution of resources, including energy use. The County is implementing effective strategies such as a school bus program, carpooling promotion, enhanced public transit options, and campuses and resources optimization. These measures are aligned with the County's broader objectives for transportation efficiency and greenhouse gas reduction.

Further, Amador County General Plan includes Goal N-2 related to minimizing noise conflicts from transportation sources. The campuses locations in urban areas allow for a wide range of travel models to and from the school campus which supports the county's goal to reduce transportation noise. Further, the proposed project would continue to implement the District's busing program which would further transportation noise.

The proposed project would not conflict with the transportation-related goals and policies from the Amador County General Plan.

Jackson General Plan

The Jackson General Plan Circulation Element (Jackson 2008) provides goals and policies to promote an effective, safe, and efficient transportation system for goods and people (Goal 2). Goal 5 and related objectives and policies aim to provide effective and efficient public transportation and reduce automobile dependency; Goal 6 and related objectives and policies aims to provide a safe, comprehensive, and integrated circulation system for non-motorized transportation.

The Circulation Element as part of the City's General Plan Update would continue to provide a framework for the City of Jackson decisions concerning the circulation of people and goods (Jackson 2023). Goal CIRC-2 and related objectives, policies, and actions aim to provide effective transport of goods and minimize traffic within the City; Goal CIRC-5 and related objectives, policies, and actions aims to provide efficient public transportation to reduce automobile dependency; Goal CIRC-6 and related policies and actions provides guidance for a safe, comprehensive, and integrated circulation system for non-motorized transportation; Goal CIRC-8 and related policies encourages reduction in vehicle miles traveled and other environmental impacts from transportation.

The proposed project would expand the enrollment capacity at Argonaut HS to provide for a combined high school and would include site improvements at Argonaut HS to accommodate the increase in student enrollment. The proposed improvements would include an expanded onsite pick-up/drop-off system and a new egress driveway connecting to Stony Creek Road. These improvements would allow for efficient circulation of pick-up/drop-off and would accommodate more vehicles onsite. The new driveway would require an encroachment permit from the City of Jackson. To further support circulation, the campus supervisor would control vehicles leaving the campus (metering). The District would also continue to provide its busing program. Therefore, the proposed project would support Jackson General Plan and Jackson General Plan Update's applicable transportation goals and policies listed above.

Further, the current Jackson Junior HS would become a preschool with reduced enrollment. Jackson Elementary School would have a slight increase in enrollment (28 students compared to existing enrollment), which would be within the campus's existing enrollment capacity. The proposed project would not include improvements at current Jackon Junior HS nor Jackson ES that could affect circulation.

The proposed impacts on scenic resources, including scenic character along scenic and historic routes is discussed in Section 5.1, *Aesthetics*. As discussed in Section 5.1, the proposed project would result in a less than significant impact to scenic resources, including resources along scenic highways. A less than significant impact would occur.

Ione General Plan

Ione General Plan Circulation Element includes goals and policies related to "develop[ing] a roadway system that accommodates future land use at the desired level of service, coexists harmoniously with other travel modes (biking, walking, and golf carts), safeguards residential areas from excessive traffic, and enhances the quality, safety, and connectivity of the city's residential, Downtown, commercial, office, and industrial areas" (Goal CIR-1) and " Establish an extensive, complete, smooth, interconnected, and continuous pedestrian and bicycle network that is a safe and attractive option for local trips or recreation and that connects to the city's neighborhoods, parks and schools, employment areas, and retail centers (Goal CIR-2). Further Goal CIR-4 aims to provide a circulation system that is properly maintained and maximizes safety for all users.

The proposed project would include improvements at Ione Junior HS to accommodate the increased enrollment capacity. The current Ione Elementary would be closed. The proposed project would not change any existing land uses or public facilities. The proposed project would not interfere with any development patterns that enhance the quality, safety, and connectivity of the City's residential Downtown, commercial, office, and industrial areas. The proposed project would hinder the City's goals to improve its transportation network, including roadway, bicycle, and pedestrian infrastructure. The improvements at Ione Junior HS would occur within the boundaries of the campus, including an expanded pick-up/drop-off system. Further, the campus supervisor would oversee a valet program where campus personnel help load and unload students from vehicles and buses and control vehicles leaving the campus (metering). The District would also continue to provide its busing program. Therefore, the proposed project would support efficient and safe circulation, and would not conflict with Ione General Plan Circulation Element.

Sutter Creek General Plan

The proposed project would not interfere with the City of Sutter Creek's General Plan Circulation Element. Specifically, Goal C-1 states "[t]he primary goal of the city of Sutter Creek Circulation Element is to ensure that public safety and adequate levels of service are maintained through a variety of available modes of transportation as the city grows." The proposed project would include site improvements at Sutter Creek Elementary School campus to accommodate the increase in student enrollment capacity. All improvements would occur within the Sutter Creek ES boundaries. The current Amador High School would further become a combined junior high school, which would have the same enrollment capacity as existing conditions, and no site improvements would occur at this campus. The Further, the campus supervisor would oversee a valet program where campus personnel help load and unload students from vehicles and buses and control vehicles leaving the campus (metering). The District would also continue to provide its busing program. Therefore, the proposed project would support efficient and safe circulation, and would not conflict with Sutter Creek Circulation Element.

Therefore, the proposed project would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities.

Level of Significance Before Mitigation: Less than significant.

Argonaut High School Site Improvements

As discussed above, the proposed project would not conflict with Jackson General Plan Circulation Element. Therefore, the proposed project at Argonaut HS would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. A **less than significant impact** would occur.

Level of Significance Before Mitigation: Less than significant.

Ione Junior High School Site Improvements

As discussed above, the proposed project would not conflict with Ione General Plan Circulation Element. Therefore, the proposed project at Ione Junior HS would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. A **less than significant impact** would occur.

Level of Significance Before Mitigation: Less than significant

Sutter Creek Elementary School Site Improvements

As discussed above, the proposed project would not conflict with Sutter Creek General Plan Circulation Element. Therefore, the proposed project at Sutter Creek ES would not conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. A **less than significant impact** would occur.

Level of Significance Before Mitigation: Less than significant.

Impact 5.15-2: The proposed project may conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b). [Threshold T-2]

School Closure/Consolidation Program

The proposed project's potentially significant impacts on Vehicle Miles Traveled (VMT) were identified by comparing the VMT per student under existing conditions to the VMT per student with the proposed school closure/consolidation program. An increase in VMT per student would be a significant impact.

As shown in Table 5.15-1, *VMT per Student, With and Without Project,* consolidating eight campuses into six would result in VMT per student increasing from 10.8 miles to 11.4 miles representing a 5.2 percent increase. Since there would be an increase in VMT per student, the proposed project would have a **potentially significant** VMT impact and may not be consistent with CEQA Guidelines Section 15064.3.

Level of Significance Before Mitigation: Potentially Significant.

Argonaut High School Site Improvements

Construction

Construction of the site improvements at Argonaut HS would require the mobilization of workers, equipment, and haul trucks to and from Argonaut HS, which would generate a temporary increase in traffic and may cause delays on roadways adjacent to the school. Construction traffic is anticipated to travel to and from the site via Argonaut Lane and SR 88. However, the increase in VMT during construction to and around Argonaut HS would be temporary and would vary depending on the construction phase. Construction activities would not establish permanent traffic patterns that would contribute to ongoing VMT increases. Since this would be a short-term increase, increases to VMT during construction activities would be considered negligible and construction related VMT impacts would be considered **less than significant.**

Operation

As discussed under *School Closure/Consolidation Program* section above, a significant impact to VMT would occur if the project would contribute an increase in VMT. Since the proposed project would increase VMT and Argonaut High School would experience an increase in enrollment with the implementation of the proposed project, VMT associated with Argonaut HS is expected to increase. Therefore, the proposed project at Argonaut HS would lead to **potentially significant** impacts.

Level of Significance Before Mitigation: Potentially Significant.

Ione Junior High School Site Improvements

Construction

Construction of the site improvements at Ione Junior HS would require the mobilization of workers, equipment, and haul trucks to and from Ione Junior HS, which would generate a temporary increase in traffic and may cause delays on roadways adjacent to the school. Construction traffic is anticipated to travel to and

from the site via South Mills Street and West Marlette Street. However, the increase in VMT during construction to and around Ione Junior HS would be temporary and would vary depending on the construction phase. Construction activities would not establish permanent traffic patterns that would contribute to ongoing VMT increases. Since this would be a short-term increase, increases to VMT during construction activities would be considered negligible and construction related VMT impacts would be considered **less than significant.**

Operation

As discussed under *School Closure/Consolidation Program* section above, a significant impact to VMT would occur if the project would contribute an increase in VMT. Since the proposed project would increase VMT and Ione Junior High School would experience an increase in enrollment with the implementation of the proposed project, VMT associated with Ione Junior HS is expected to increase. Therefore, the proposed project at Ione Junior HS would lead to **potentially significant** impacts.

Level of Significance Before Mitigation: Potentially Significant.

Sutter Creek Elementary School Site Improvements

Construction

Construction of the site improvements at Sutter Creek ES would require the mobilization of workers, equipment, and haul trucks to and from Sutter Creek ES, which would generate a temporary increase in traffic and may cause delays on roadways adjacent to the school. Construction traffic is anticipated to travel to and from the site via Spanish Street and Old Route 49. However, the increase in VMT during construction to and around Sutter Creek ES would be temporary and would vary depending on the construction phase. Construction activities would not establish permanent traffic patterns that would contribute to ongoing VMT increases. Since this would be a short-term increase, increases to VMT during construction activities would be considered negligible and construction related VMT impacts would be considered **less than significant.**

Operation

As discussed under *School Closure/Consolidation Program* section above, a significant impact to VMT would occur if the project would contribute an increase in VMT. Since the proposed project would increase VMT and Sutter Creek ES would experience an increase in enrollment with the implementation of the proposed project, VMT associated with Sutter Creek ES is expected to increase. Therefore, the proposed project at Sutter Creek ES would lead to **potentially significant** impacts.

Level of Significance Before Mitigation: Potentially Significant.

Impact 5.15-3: The proposed project would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment). [Threshold T-3]

School Closure/Consolidation Program

The proposed project at the program-level includes the consolidation of eight campuses to six campuses, and the relocation of students across the six campuses. The campuses currently operate with school uses and would continue to operate with school uses with the implementation of the proposed project. Therefore, the proposed project would not introduce incompatible uses. With the exception of a new driveway at Argonaut High School, which would require an encroachment permit from the City of Jackson and review by DSA, no roadway nor mobility infrastructure improvements are proposed. The design of the proposed internal drive aisles, access driveways, and other circulation improvements at Argonaut HS and Ione Junior HS would be required to adhere to the CDE guidelines for site design and circulation. Compliance with CDE's established design standards and continued implementation or signage and pedestrian circulation features by cities and the county 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.

Since the proposed project would occur on existing school campuses and is not incompatible with surrounding land uses, there are no off-site improvements, and all on-site improvements would be made adhering to the latest design standards for CDE preventing hazardous conditions (and the city of Jackson for Argonaut High School), the proposed project would result in a **less than significant impact**.

Level of Significance Before Mitigation: Less than significant impact.

Argonaut High School Site Improvements

Construction

Construction of the site improvements at Argonaut HS would temporarily generate additional traffic on the existing area roadway network. These vehicle trips would include construction workers traveling to and from the project site, as well as delivery trips associated with construction equipment and materials. Construction equipment and materials would be staged within the Argonaut HS campus, and construction workers would park on campus. Therefore, construction activities would not result in increased geometric hazards on surrounding public rights-of-way and access would be maintained during construction. The project site is located in an urbanized area and construction activity would be typical of school buildings and improvements; therefore, construction activity would not represent incompatible uses. Thus, construction impacts would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be **less than significant.**

Operation

Argonaut HS currently operates as a school campus and would continue operating as a school campus with the implementation of the proposed project. Therefore, the proposed project at Argonaut HS would not result in an incompatible use.

As discussed under *School Closure/Consolidation Program* section above, site improvements at Argonaut HS would include the installation of a new driveway to Stony Creek Road. The design and construction of the driveway would be reviewed and approved by the City of Jackson during the encroachment permit process. Further, the driveway, new pick-up/drop-off circulation, and accessibility improvements would be required to adhere to the CDE guidelines for site design and circulation and would be reviewed by DSA. Compliance with CDE's established design standards and continued implementation or roadway and pedestrian circulation features consistent with the Jackson General Plan 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 campus. Further, the campus supervisor would control vehicles leaving the campus (metering) to allow for efficient circulation onto public streets. Therefore, the site improvements at Argonaut HS would not result in an increased hazard due to geometric design features.

Since the improvements would occur on the existing school campus and is not incompatible with surrounding land uses, operation would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be **less than significant.**

Level of Significance Before Mitigation: Less than significant.

Ione Junior High School Site Improvements

Construction

Construction of the site improvements at Ione Junior HS would temporarily generate additional traffic on the existing area roadway network. These vehicle trips would include construction workers traveling to and from the project site, as well as delivery trips associated with construction equipment and materials. Construction equipment and materials would be staged within the Ione Junior HS campus, and construction workers would park on campus. Therefore, construction activities would not result in increased geometric hazards on surrounding public rights-of-way and access would be maintained during construction. The project site is located in an urbanized area and construction activity would be typical of school buildings and improvements; therefore, construction activity would not represent incompatible uses. Thus, construction impacts would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be **less than significant.**

Operation

Ione Junior HS currently operates as a school campus and would continue operating as a school campus with the implementation of the proposed project. Therefore, the proposed project at Ione Junior HS would not result in an incompatible use.

The site improvements at Ione Junior HS include new internal pick-up/drop-off circulation. Improvements to the pick-up/drop-off would be required to adhere to the CDE guidelines for site design and circulation and be reviewed and approved by DSA. Compliance with CDE's established design standards, approval by DSA, and implementation or signage and continued vehicle, pedestrian, and transit circulation improvements as discussed in the Ione General Plan 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 campus. Further, the campus supervisor would oversee a valet program where campus personnel help load and unload students from vehicles and buses and control vehicles leaving the campus (metering) to allow for efficient circulation onto public streets.

Since the improvements would occur on the existing school campus and is not incompatible with surrounding land uses, operation would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be **less than significant.**

Level of Significance Before Mitigation: Less than significant.

Sutter Creek Elementary School Site Improvements

Construction

Construction of the site improvements at Sutter Creek ES would temporarily generate additional traffic on the existing area roadway network. These vehicle trips would include construction workers traveling to and from the project site, as well as delivery trips associated with construction equipment and materials. Construction equipment and materials would be staged within the Sutter Creek ES campus, and construction workers would park on campus. Therefore, construction activities would not result in increased geometric hazards on surrounding public rights-of-way and access would be maintained during construction. The project site is located in an urbanized area and construction activity would be typical of school buildings and improvements; therefore, construction activity would not represent incompatible uses. Thus, construction impacts would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be **less than significant.**

Operation

The site improvements at Sutter Creek ES do not include any circulation or off-site improvements. Further, the campus supervisor would oversee a valet program where campus personnel help load and unload students from vehicles and buses and control vehicles leaving the campus (metering) to allow for efficient circulation onto public streets. Since all improvements would occur on the existing school campus and is not incompatible with surrounding land uses and no circulation improvements are proposed, operation would not substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and impacts would be **less than significant.**

Level of Significance Before Mitigation: Less than significant.

Impact 5.15-4: The proposed project would not result in inadequate emergency services. [Threshold T-4]

School Closure/Consolidation Program

Emergency response requires a balance of emergency response time and evacuation needs with other community concerns, such as urban design and traffic calming. The School Closure/Consolidation Program would not include off-site roadway improvements (except the new driveway at Argonaut HS). Individual campuses' enrollment capacity would increase at Argonaut HS, Ione Junior HS, and Sutter Creek ES; and capacity would decrease at Amador HS and Jackson Junior HS. Enrollment capacity at Jackson Junior HS would stay the same. All roadway users would be required to adhere to state regulations in regard to emergency services. Across its campuses in the proposed project, the District is implementing valet and/or metering program to support efficient pick-up/drop-off and ensure adequate emergency access. The three campuses with site improvements would be reviewed by DSA and the applicable jurisdiction's fire department to ensure adequate vehicle ingress-egress, including bus access and internal circulation, and adequate emergency access is maintained at all times. Vehicles traveling to and from the campuses would be required to adhere to standard traffic regulations, such as making room for emergency vehicles to pass. Thus, the program would have **a less than significant impact** on emergency access.

Level of Significance Before Mitigation: Less than significant impact.

Argonaut High School Site Improvements

The site improvements at Argonaut HS include creating new drop-off/pick-up circulation and driveway connecting to Stony Creek Road. The driveway to Stony Creek Road would be reviewed and approved by DSA and reviewed by the City of Jackson during the encroachment permit process. The improvements include longer driveways with more drop-off/pick-up area lengths which in turn improve internal circulation, reduce external congestion, and improve emergency access. The drop-off/pick-up area would be delineated and have one lane at the loading area so the students would not have to cross multiple lanes to get into their cars. The site improvements at Argonaut HS would not result in inadequate emergency access. Further, the District is implementing a metering program to support efficient pick-up/drop-off and ensure adequate emergency access. Vehicles traveling to and from the campuses would be required to adhere to standard traffic regulations, such as making room for emergency vehicles to pass Thus, impacts would be **less than significant.**

Level of Significance Before Mitigation: Less than significant.

Ione Junior High School Site Improvements

The site improvements at Ione Junior HS include an expanded drop-off/pick-up circulation. Like discussed for Argonaut HS, these changes would improve internal circulation and improve emergency access. Additionally, the drop-off/pick-up area would be delineated and have one lane at the loading area so the students would not have to cross multiple lanes to get into their cars. The District is implementing valet and metering program to support efficient pick-up/drop-off and ensure adequate emergency access. Vehicles traveling to and from the campuses would be required to adhere to standard traffic regulations, such as making room for emergency

vehicles to pass. The site improvements at Ione Junior HS would not result in inadequate emergency access. Thus, impacts would be **less than significant.**

Level of Significance Before Mitigation: Less than significant.

Sutter Creek Elementary School Site Improvements

The site improvements at Sutter Creek ES do not include circulation or any offsite roadway improvements. The proposed improvements at Sutter Creek ES would be reviewed and approved by DSA to ensure adequate emergency access is maintained at all times. Vehicles traveling to and from the campuses would be required to adhere to standard traffic regulations, such as making room for emergency vehicles to pass. All improvements would be made inside the existing campus and would result in a less than significant impact to emergency access.

Level of Significance Before Mitigation: Less than significant impact.

5.15.4 Mitigation Measures

Impact 5.15-2

T-1 The District shall develop and implement a Transportation Demand Management (TDM) plan that would encourage carpooling among students or use of alternative modes (bicycle, pedestrian, and transit). Elements of a TDM plan can consist of the following measures:

- Distribution of information concerning alternative transportation options.
- Hiring a travel demand management coordinator to administer the TDM program.
- Develop and implement a ridesharing or carpooling program for students. The ridesharing "School Pool" program will help to match parents to transport students to/from campus.
- Encourage the additional use of school buses.

5.15.5 Level of Significance After Mitigation

Mitigation Measure T-1, identified above, may reduce the increase of VMT per student and potential impacts associated with transportation to a level that is less than significant. However, the impact would remain significant and unavoidable because the effectiveness of a TDM Plan in reducing the number of project trips cannot be quantified to ensure project impacts would be fully mitigated.

5.15.6 Cumulative Impacts

Cumulative impacts to transportation would occur when the impacts of the proposed project, in conjunction with other cumulative projects in the City, result in multiple and/or cumulative impacts to transportation in the area. The construction and operation of the proposed project would not hinder Amador County nor the cities of Jackson, Ione, and Sutter Creek from implementing each jurisdictions' adopted policies, plans, and programs regarding circulation, including roadway, transit, and pedestrian facilities. Other projects in the region would also be required to show/evaluate consistency with applicable plans and policies, including but not limited to the RTP and County and/or city general plans. Development projects' consistency with applicable plans and policies would be separately reviewed by the applicable lead agency. If needed, the lead agency would require appropriate mitigation measures for each development project to reduce identified impacts. The proposed project would not contribute to a cumulatively considerable impact related to consistency with applicable programs, plans, ordinances, or policies.

Each development project would be designed to minimize design hazards and incompatible uses and provide adequate emergency access. Further, the design of each development project would be evaluated individually by the lead agency, including in coordination with applicable departments that review transportation and safety (such as department of transportation, building and safety, and fire department). This review process would minimize potential impacts from hazardous design features, incompatible uses, and conflicts with emergency access. The proposed project does not represent an incompatible traffic/transportation use nor lead to an increase in hazards due to geometric design. The proposed project incorporates extended pick-up and drop-off, circulation improvements, and pick-up/drop-off supervision onsite to allow for efficient circulation during pick up and drop off. The proposed project would be required to follow CDE's design standards and would be reviewed by the DSA. Therefore, the proposed project would not contribute to a cumulatively considerable impact related to geometric design, incompatible uses, and emergency access.

Each development project would be reviewed for its contribution to VMT. The proposed project may have a significant and unavoidable impact even with the incorporation of Mitigation Measure T-1. This would result in a cumulatively considerable impact on VMT in the area.

Mitigation Measure: Implementation of Mitigation Measure T-1.
Significance After Mitigation: Significant and Unavoidable.

5.15.7 References

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5. Environmental Analysis
TRANSPORTATION

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5.16 TRIBAL CULTURAL RESOURCES

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the proposed project to impact tribal cultural resources. The analysis in this section is based, in part, on the Archaeological Resources and Architectural History Inventory and Evaluation Report prepared for the proposed project (Appendix D) and Native American consultation pursuant to Assembly Bill (AB) 52. Potential impacts to other cultural resources (i.e., historic resources, archaeological resources, and human remains) are evaluated in Section 5.4, *Cultural Resources*.

A complete copy of the Archaeological Resources and Architectural History Inventory and Evaluation Report for Amador County Unified School District Project prepared by ECORP Consulting, Inc. and dated September 2023 is provided in Appendix D.

5.16.1 Environmental Setting

5.16.1.1 REGULATORY BACKGROUND

Federal, state, and local laws, regulations, plans, or guidelines related to tribal cultural resources and potentially applicable to the proposed project are summarized below.

Federal

Native American Graves Protection and Repatriation Act

The Native American Graves Protection and Repatriation Act is a federal law passed in 1990 that mandates museums and federal agencies to return certain Native American cultural items—such as human remains, funerary objects, sacred objects, or objects of cultural patrimony—to lineal descendants or culturally affiliated Native American tribes.

National Register of Historic Places

The National Register of Historic Places recognizes properties that are significant at the national, state, and/or local levels and includes districts, sites, buildings, structures, and objects that are significant in American history, architecture, archaeology, engineering, and culture.

Properties are nominated to the National Register by the State Historic Preservation Officer of the state in which the property is located, by the Federal Preservation Officer for properties under federal ownership or control, or by the Tribal Historic Preservation Officer if a property is on tribal lands.

The criteria for listing in the National Register follow the standards for determining if properties, sites, districts, structures, or landscapes of potential significance are eligible for nomination. In addition to meeting any or all of the following criteria, properties nominated must also possess integrity of location, design, setting, feeling, workmanship, association, and materials:

Associated with events that have made a significant contribution to the broad patterns of history.

Associated with the lives of persons significant in our past.

Embody the distinctive characteristics of a type, period, or method of construction; represent the work of a master; possess high artistic values; or represent a significant and distinguishable entity whose components may lack individual distinction.

Yield, or may be likely to yield, information important in prehistory or history.

National Historic Preservation Act

The National Historic Preservation Act supplements the provisions of the Antiquities Act of 1906 and established laws for historic resources to "preserve important historic, cultural, and natural aspects of our national heritage, and to maintain, wherever possible, an environment that supports diversity and a variety of individual choice." The law makes it illegal to destroy, excavate, or remove from federal or Indian lands any archaeological resources without a permit from the land manager. Regulations for the ultimate disposition of materials recovered as a result of permitted activities state that archaeological resources excavated on public lands remain the property of the United States. Archaeological resources excavated from Indian lands remain the property of the Indian or Indian tribe having rights of ownership over such resources.

American Indian Religious Freedom Act

The American Indian Religious Freedom Act of 1978 proclaims that the US government will respect and protect the rights of Indian tribes to freely exercise their traditional religions. The courts have interpreted this as requiring agencies to consider the effects of their actions on traditional religious practices.

Archaeological Resources Protection Act

The Archaeological Resources Protection Act (US Code, Title 16, Sections 470aa–mm) became law on October 31, 1979, and has been amended four times. It regulates the protection of archaeological resources and sites that are on federal and Indian lands.

State

Public Resources Code

Archaeological resources are protected pursuant to a wide variety of state policies and regulations enumerated under the California Public Resources Code (PRC). In addition, cultural resources are recognized as nonrenewable resources and therefore receive protection under the PRC and the California Environmental Quality Act (CEQA).

PRC Sections 5097.9 to 5097.991 provide protection to Native American historical and cultural resources and sacred sites and identify the powers and duties of the Native American Heritage Commission (NAHC). These PRC Sections also require notification to descendants of discoveries of Native American human remains and provide for treatment and disposition of human remains and associated grave goods.

PRC Section 5097.9 states that no public agency or private party on public property shall "interfere with the free expression or exercise of Native American Religion." The Code further states that:

> No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine… except on a clear and convincing showing that the public interest and necessity so require. County and city lands are exempt from this provision, except for parklands larger than 100 acres.

Health and Safety Code

The discovery of human remains is regulated by California Health and Safety Code Section 7050.5, which states that:

> In the event of discovery or recognition of any human remains in any location other than a dedicated cemetery, there shall be no further excavation…until the coroner…has determined…that the remains are not subject to…provisions of law concerning investigation of the circumstances, manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible…. The coroner shall make his or her determination within two working days from the time the person responsible for the excavation, or his or her authorized representative, notifies the coroner of the discovery or recognition of the human remains. If the coroner determines that the remains are not subject to his or her authority and…has reason to believe that they are those of a Native American, he or she shall contact, by telephone within 24 hours, the Native American Heritage Commission.

Assembly Bill 52

The Native American Historic Resource Protection Act (AB 52) took effect July 1, 2015; amended PRC Section 5097.94; and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. The primary intent of AB 52 was to involve California Native American Tribes early in the environmental review process and to establish a new category of resources related to Native Americans that require consideration under CEQA, known as Tribal Cultural Resources. AB 52 requires tribal consultation and analysis of potential impacts to tribal cultural resources in the CEQA process. AB 52 further requires that impacts to tribal cultural resources be analyzed like any other CEQA topic and establishes a consultation process for lead agencies and California tribes. Projects that require a notice of preparation (NOP) of an EIR or notice of intent (NOI) to adopt a (mitigated) negative declaration are subject to AB 52. A significant impact on a tribal cultural resource is considered a significant environmental impact, requiring feasible mitigation measures.

Tribal cultural resources must have certain characteristics:

1) Sites, features, places, cultural landscapes (must be geographically defined), sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historic Resources or included in a local register of historical resources. (Public Resources Code [PRC] Section 21074(a)(1))

2) The lead agency, supported by substantial evidence, chooses to treat the resource as a TCR. (PRC Section 21074(a)(2))

The first category requires that the TCR qualify as a historical resource according to PRC Section 5024.1. The second category gives the lead agency discretion to qualify that resource—under the conditions that it support its determination with substantial evidence and consider the resource's significance to a California tribe. The following is a brief outline of the process in PRC Sections 21080.3.1 to .3.3.

1. A California Native American tribe asks agencies in the geographic area with which it is traditionally and culturally affiliated to be notified about projects. Tribes must ask in writing.
2. Within 14 days of deciding to undertake a project or determining that a project application is complete, the lead agency must provide formal written notification to all tribes who have requested it.
3. A tribe must respond within 30 days of receiving the notification if it wishes to engage in consultation.
4. The lead agency must initiate consultation within 30 days of receiving the request from the tribe.
5. Consultation concludes when both parties have agreed on measures to mitigate or avoid a significant effect to a TCR, or a party, after a reasonable effort in good faith, decides that mutual agreement cannot be reached.
6. Regardless of the outcome of consultation, the CEQA document must disclose significant impacts on TCRs and discuss feasible alternatives or mitigation that avoid or lessen the impact.

California Register of Historical Resources

The California Register is the state version of the National Register of Historic Places. It was enacted in 1992 and became official January 1, 1993. The California Register was established to serve as an authoritative guide to the state's significant historical and archaeological resources. Resources that may be eligible for listing include buildings, sites, structures, objects, and historic districts. According to subsection (c) of PRC Section 5024.1, a resource may be listed as a historical resource in the California Register if it meets any of the four criteria listed under "National Register of Historic Places," above.

Local

Jackson General Plan

The Open Space and Conservation Element of the Jackson General Plan does not contain any policies related to tribal cultural resources (Jackson 1987). The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals and policies related to tribal cultural resources are outlined here (Jackson 2023).

- **Goal COS-4**: Preserve historical, architectural, cultural, and tribal resources in order to bolster community heritage and protect significant resources for future generations.
- **Policy COS 4.1:** Recognize significant historical resources and use these resources to promote a sense of place and history in Jackson. Seek to incorporate reminders of Jackson's culture in the built and

natural environment through adaptive reuse, signage, markers, and other reminders of Jackson's heritage.

- **Policy COS 4.5:** If found during construction, ensure that human remains are treated with sensitivity and dignity, and ensure compliance with the provisions of California Health and Safety Code Section 7050.5 and California Public Resources Code Section 5097.98.

- **Policy COS 4.6**: Work with Native American representatives to identify and appropriately address, through avoidance or mitigation, impacts to Native American cultural resources and sacred sites during the development review process.

Ione General Plan

The Conservation and Open Space Element of the Ione General Plan contains one policy regarding tribal cultural resources (Ione 2009).

- **Policy CO-9.3:** Where land designated or proposed to be designated for parks or open space contains Native American, historical, cultural and sacred sites, the City shall consult with the tribe as to the level of confidentiality required to protect the site and as to appropriate dignity to afford the site in any management plan.

Sutter Creek General Plan

The Historic Element of the Sutter Creek General Plan provides an objective and two policies related to tribal cultural resources (Sutter Creek 2019).

- **Objective H-1.1:** The preservation of the historic character of the city through preservation and enhancement of historic structures, sites and districts, and archeological resources.

- **Policy H-1.1.3:** The North Central Information Center at Sacramento State University and qualified historians or individuals knowledgeable about the City's history shall be offered adequate information and time to review and comment upon major development proposal that has a potential to affect known or unknown cultural or historical resources. (The North Central Information Center is a regional clearinghouse regarding archaeological information and requirements.)

- **Policy H-1.1.4:** Development projects shall notify the City and relevant parties if historic or prehistoric occupancy or use of the site is discovered during grading or building activities.

5.16.1.2 EXISTING CONDITIONS

Tribal cultural resources are defined by PRC Section 21074 as sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either included or determined to be eligible for inclusion in the California Register of Historical Resources (California Register) or included in a local register of historical resources, or a resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant. Historical resources, unique archaeological

resources, or nonunique archaeological resources may also be tribal cultural resources if they meet these criteria. Argonaut HS, Ione Junior HS, and Sutter Creek ES are developed school campuses surrounded by other development, rural residential, and open space.

Project Areas within Argonaut High School, Ione Junior High School and Sutter Creek Elementary School

The Archaeological Resources and Architectural History Inventory and Evaluation Report for the proposed project identified project areas within Argonaut HS, Ione Junior HS and Sutter Creek ES campuses for purposes of archaeological resources.

"Archaeology project areas" are defined for the three campuses. Each archaeology project area consists of locations within the campus that require ground disturbance. The Sutter Creek ES campus consists of a single archaeology project area. The Ione Junior HS campus consists of two noncontiguous archaeology project areas. Argonaut HS consists of four discontinuous archaeology project areas.

Refer to Figures 5.4-1 through 5.4-3 in Chapter 5.4, *Cultural Resources*, for boundaries of the archaeological project areas.

Soil Condition

Soils data indicate a variable potential for buried, precontact archaeological resources in certain areas of the project sites. Amphibolite schist soils at the Sutter Creek ES and Argonaut HS locations indicate a late-Cretaceous deposition, which predates humans and, therefore has a relatively low potential for any preserved subsurface archaeological material. Ione Junior HS is adjacent to an unnamed historic creek bed. Together with the presence of alluvium and the likelihood of precontact archaeological sites along perennial and recurring waterways, the potential for previously unknown precontact resources buried at Ione Junior HS is moderate to high.

Ethnographic Setting

Prior to the arrival of European-Americans in the region, indigenous groups speaking more than 100 different languages and occupying a variety of ecological settings inhabited California. Multiple studies recognized the uniqueness of California's indigenous groups and classified them as belonging to the California culture area. California gets further subdivided into four subculture areas: Northwestern, Northeastern, Southern, and Central.

When the first European explorers entered the regions between 1772 and 1821, an estimated 100,000 people, about one-third of the state's native population, lived in the Central Valley. At least seven distinct languages of Penutian stock were spoken among these populations: Wintu, Nomlaki, Konkow, River Patwin, Nisenan, Miwok, and Yokuts. Common linguistic roots and similar cultural and technological characteristics indicate that these groups shared a long history of interaction. The Southern area encompasses the archaeology project areas and includes the Foothill Yokuts. The archaeology project areas are situated in the traditionally recognized territory of the Penutian-speaking Sierra Miwok.

At the time of contact, the Miwok were one of the largest groups in California, occupying vast stretches of land extending from the Sierra Nevada, across the Great Valley, and into portions of the North Coast above San Francisco. The Miwok people have been divided by anthropologists into four regional groups: the Bay Miwok, Coast Miwok, Plains Miwok, and Sierra Miwok. The Sierra Miwok are further identified by three subgroups, the Northern Sierra Miwok, Central Sierra Miwok and Southern Sierra Miwok. The Northern Sierra Miwok occupied the "the foothill and mountain portions of the Stanislaus and Tuolumne drainages" (ECORP 2023). The Central Sierra Miwok occupied the foothill region south of the Cosumnes River to the upper drainages of the Chowchilla and Merced Rivers. The Southern Sierra Miwok occupied the upper drainages of the Merced and Chowchilla rivers. The archaeology project areas are located in the territory of the Northern Sierra Miwok.

Miwok settlement and subsistence patterns were coordinated with the seasonal ripening of plant foods and the movements and migration of game animals. Valley flooding may have prompted certain species, such as elk, antelope, and bears, to migrate to higher ground in the lower valley foothill belt of the Sierra. Anadromous fish, such as steelhead and salmon, migrated up the main rivers and tributaries.

The primary political unit was the "tribelet" (Kroeber 1932) with a range of 100 to 300 people. Each tribelet was an independent sociopolitical organization with territorial boundaries associated with the control of natural resources. Each tribelet had a few permanent settlements (villages) and several seasonal campsites.

The typical mountain dwelling was the conical bark house. Semisubterranean earth roundhouses were constructed for ceremonial purposes. After the death of a chief, the roundhouse would be burned as part of the Miwok mourning ceremony.

Sierra Miwok used bows and arrows as their primary weapon for hunting and warfare. They made their bows from ash, oak, willow, pepperwood, maple, or hazel. Flaked and ground stone tools included knives, arrow and spear points, arrow straighteners, scrapers, rough cobble pestles and shaped pestles, and bedrock mortars. Nonutilitarian artifacts included pipes and charmstones. Obsidian was highly valued as a raw material for stone tools.

Sierra Miwok groups moved with the seasons to obtain resources within their territory. The most important subsistence resources were acorns (preferably from tan oak and black oak), seeds, nuts (nuts from grey pine were prized) and other plant resources, deer, antelope, rabbits, and fish.

Trade with groups on the eastern side of the Sierras was important. The Sierra Miwok exchanged grass seeds, fish, and shell beads (obtained from the coast) for obsidian, tobacco, pottery, and clay pipes (ECORP 2023).

Tribal Consultation

In compliance with the requirements of AB 52, the District provided formal notification of the proposed project to three tribes on June 21, 2023. These letters were emailed and certified mailed to:

- Adam Dalton, Chairperson, Jackson Rancheria of Me-Wuk Indians of California
- Sara Dutschke, Chairperson, The Ione Band of Miwok Indians

- Rhonda Morningstar Pope, Chairperson, The Buena Vista Rancheria of Me-Wuk Indians of California

No responses from the tribes were received.

5.16.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project would:

TCR-1 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

ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code § 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

5.16.3 Environmental Impacts

The following impact analysis addresses thresholds of significance. The applicable thresholds are identified in brackets after the impact statement.

Impact 5.16-1: The proposed project could cause a substantial adverse change in the significance of a tribal cultural resource that is 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). The proposed project would cause a substantial adverse change in the significance of a tribal cultural resource that is determined by the lead agency to be significant pursuant to criteria in Public Resources Code section 5024.1(c). [Threshold TCR-1.i and TCR-1.ii]

The record search also determined that 48 previously recorded pre-contact and historic-period cultural resources are located within 0.5 mile of the archeology project areas. Of these, two are believed to be associated with Native American occupation of the vicinity, and 46 are historic-period resources associated with early European-American ranching and mining activities. There are no previously recorded cultural resources within the archeology project areas. Appendix A of the Archaeological Resources and Architectural History Inventory and Evaluation Report lists the resources located within 0.5 mile of the archeology project areas (see Appendix D). A Native American villages were identified near the three campuses. The nearest Native American village to the Sutter Creek ES is approximately 3,000 feet away. The nearest Native American village to Ione Junior

HS is approximately 200 feet away. The nearest Native American village to Argonaut HS is approximately 6,000 feet away. A search of the Sacred Lands File by the NAHC indicated the presence of Native American cultural resources within the archeology project area. No historic-era or pre-contact archaeological materials were identified during any of the field surveys (ECORP 2023).

As discussed above, the District contacted three tribes pursuant to AB52 and no responses were received.

Argonaut High School Site Improvements

The Archaeological Resources and Architectural History Inventory and Evaluation Report determined that there is a low potential for buried pre-contact resources at Argonaut HS.

During the construction of the site improvements at Argonaut HS, specifically ground disturbing activities, there is the potential to discover previously unknown tribal cultural resources which might qualify. No known tribal cultural resources have been identified on the project site, so the site improvements at Argonaut HS would not cause a substantial adverse change in the significance of a known tribal cultural resource, either listed in the California Register of Historic Resources or in a local register. There is a chance, however, that the construction of the proposed project would discover an unknown tribal cultural resource could be discovered that is eligible for listing in the California Register of Historic Resources or in a local register or significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. Therefore, the proposed project would lead to **potentially significant** impacts.

Ione Junior High School Site Improvements

The Archaeological Resources and Architectural History Inventory and Evaluation Report determined that moderate to high potential for buried pre-contact resources at Ione Junior HS.

During the construction of the site improvements at Ione Junior HS, specifically ground disturbing activities, there is the potential to discover previously unknown tribal cultural resources which might qualify. No known tribal cultural resources have been identified on the project site, so the site improvements at Ione Junior HS would not cause a substantial adverse change in the significance of a known tribal cultural resource, either listed in the California Register of Historic Resources or in a local register. There is a chance, however, that the construction of the proposed project would discover an unknown tribal cultural resource could be discovered that is eligible for listing in the California Register of Historic Resources or in a local register or significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. Therefore, the proposed project would lead to **potentially significant** impacts.

Sutter Creek Elementary School Site Improvements

The Archaeological Resources and Architectural History Inventory and Evaluation Report determined that there is a low potential for buried pre-contact resources at Sutter Creek ES.

During the construction of the site improvements at Sutter Creek ES, specifically ground disturbing activities, there is the potential to discover previously unknown tribal cultural resources which might qualify. No known tribal cultural resources have been identified on the project site, so the site improvements at Sutter Creek ES would not cause a substantial adverse change in the significance of a known tribal cultural resource, either listed

in the California Register of Historic Resources or in a local register. There is a chance, however, that the construction of the proposed project would discover an unknown tribal cultural resource could be discovered that is eligible for listing in the California Register of Historic Resources or in a local register or significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. Therefore, the proposed project would lead to **potentially significant** impacts.

Level of Significance Before Mitigation: Potentially significant.

5.16.4 Mitigation Measures

Impacts 5.16-1

TCR-1 Prior to the start of construction, Amador County Unified School District shall retain a qualified professional archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology. If subsurface deposits believed to be cultural or human in origin are discovered during construction, all work must halt within a 100-foot radius of the discovery. The qualified professional archaeologist shall evaluate the significance of the find, and shall have the authority to modify the no-work radius as appropriate, using professional judgment. The following notifications shall apply, depending on the nature of the find:

- If the professional archaeologist determines that the find does not represent a cultural resource, work may resume immediately and no agency notifications are required.
- If the professional archaeologist determines that the find does represent a cultural resource from any time period or cultural affiliation, the archaeologist shall immediately notify the lead agencies. The agencies shall consult on a finding of eligibility and implement appropriate treatment measures, if the find is determined to be a Historical Resource under CEQA, as defined in Section 15064.5(a) of the CEQA Guidelines or a historic property under Section 106 NHPA, if applicable. Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the resource either: 1) is not a Historical Resource under CEQA or a Historic Property under Section 106; or 2) that the treatment measures have been completed to their satisfaction. Treatment measures would include:
  - Any tribal cultural resources unearthed by project activities shall be evaluated by the qualified archaeologist. If the resources are Native American in origin, the proper Tribe(s) will retain it/them in the form and/or manner the Tribe(s) deems appropriate.
  - If the find is not a tribal cultural resource or the proper Tribe does not provide treatment measures, preservation in place (i.e., avoidance) is the preferred manner of treatment. 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. Any historic archaeological

material that is not Native American in origin shall be curated at a public, non-profit institution with a research interest in the materials if such an institution agrees to accept the material. If no institution accepts the archaeological material, it shall be offered to a local school or historical society in the area for educational purposes.

- If the find includes human remains, or remains that are potentially human, they shall ensure reasonable protection measures are taken to protect the discovery from disturbance (AB 2641). The archaeologist and Amador County Unified School District shall notify the Amador County Coroner (per Section 7050.5 of the Health and Safety Code). The provisions of Section 7050.5 of the California Health and Safety Code, Section 5097.98 of the California PRC, and AB 2641 will be implemented. If the coroner determines the remains are Native American and not the result of a crime scene, the coroner will notify the NAHC, which then will designate a Native American Most Likely Descendant (MLD) for the Project (Section 5097.98 of the PRC). The designated MLD will have 48 hours from the time access to the property is granted to make recommendations concerning treatment of the remains. If the landowner does not agree with the recommendations of the MLD, the NAHC can mediate (Section 5097.94 of the PRC). If no agreement is reached, the landowner must rebury the remains where they will not be further disturbed (Section 5097.98 of the PRC). This will also include either recording the resource with the NAHC or the appropriate Information Center; using an open space or conservation zoning designation or easement; or recording a reinternment document with the county in which the property is located (AB 2641). Work may not resume within the no-work radius until the lead agencies, through consultation as appropriate, determine that the treatment measures have been completed to their satisfaction.

5.16.5 Level of Significance After Mitigation

The mitigation measures identified above would reduce potential impacts associated with tribal cultural resources to a level that is less than significant. Therefore, no significant unavoidable adverse impacts relating to tribal cultural resources remain.

5.16.6 Cumulative Impacts

Cumulative impacts to tribal cultural resources would occur when the impacts of the proposed project, in conjunction with other cumulative projects in the City, result in multiple and/or cumulative impacts to tribal cultural resources in the area. The presence of tribal cultural resources is site specific. The proposed project incorporates Mitigation Measures TCR-1, which would reduce potential impacts to a less than significant level. Similar to the proposed project, it is anticipated that other cumulative projects would consult with NAHC and comply with AB 52 as required. Each cumulative project would consult with Native American tribes that request consultation and develop appropriate mitigation measures. With compliance with federal and state regulations for the treatment of Native American and archaeological resources, and appropriate mitigation measures, the

proposed project in conjunction with the cumulative projects would not result in a cumulatively considerable impact to tribal cultural resources. A **less than significant impact** would occur.

5.16.7 References

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5. Environmental Analysis
TRIBAL CULTURAL RESOURCES

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5.17 UTILITIES AND SERVICE SYSTEMS

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the School Closure/Consolidation Program Project to impact utilities and services systems. Utilities and services systems include wastewater (sewage) treatment and collection systems, water supply and distribution systems, storm drainage, solid waste collection and disposal, and other public utilities. Potential impacts to hydrology (e.g., flooding) and water quality are provided in Section 5.9, *Hydrology and Water Quality*. Storm drainage, though discussed below, is also addressed in Section 5.9, *Hydrology and Water Quality*.

5.17.1 Wastewater Treatment and Collection

5.17.1.1 ENVIRONMENTAL SETTING

Regulatory Background

Federal, state, and local laws, regulations, plans, or guidelines related to wastewater treatment and collection and potentially applicable to the proposed project are summarized below.

Federal

Clean Water Act

The Clean Water Act (CWA) is a 1977 amendment to the Federal Water Pollution Control Act of 1972. The CWA is the principal statute governing water quality. It establishes the basic structure for regulating discharges of pollutants into the waters of the United States[1] and gives the federal Environmental Protection Agency (EPA) the authority to implement pollution-control programs, such as setting wastewater standards for industry. The statute's goal is to end all discharges entirely and to restore, maintain, and preserve the integrity of the nation's waters. The CWA regulates both the direct and indirect discharge of pollutants into the nation's waters. The CWA sets water quality standards for all contaminants in surface waters and makes it unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a permit is obtained under its provisions. The CWA mandates permits for wastewater and stormwater discharges, requires states to establish site-specific water quality standards for navigable bodies of water, and regulates other activities that affect water quality, such as dredging and the filling of wetlands. The CWA also funded the construction of sewage treatment plants and recognized the need for planning to address nonpoint sources of pollution. The following CWA Sections assist in ensuring water quality in surrounding water bodies.

- **Section 208** of the CWA requires the use of best management practices (BMPs) to control discharge of pollutants in stormwater during construction.

[1] Waters of the US generally include surface waters—lakes, rivers streams, bays, the ocean, dry streambeds, wetlands—and storm sewers that are tributary to any surface water body.

- **Section 303(d)** requires creation of a list of impaired water bodies by states, territories, and authorized tribes; evaluation of lawful activities that may impact impaired water bodies;[2] and preparation of plans to improve the quality of these water bodies. Water bodies on the list do not meet water quality standards, even after point sources of pollution have installed the minimum required levels of pollution-control technology.

- **Section 402(p)** establishes a framework to control water pollution by regulating point-source discharges under the National Pollutant Discharge Elimination System (NPDES) permit program. Point-source discharges are readily identifiable, discrete inputs where waste is discharged to the receiving waters from a pipe or drain. Nonpoint discharges occur over a wide area and are associated with particular land uses (such as urban runoff from streets and stormwater from construction sites).

National Pollution Discharge Elimination System

Under the NPDES program (under § 402 of the CWA), all facilities that discharge pollutants from any point source into waters of the U.S. must have a NPDES permit. The term "pollutant" broadly applies to any type of industrial, municipal, and agricultural waste discharged into water. Point sources can be publicly owned treatment works (POTWs), industrial facilities, and urban runoff. The NPDES program addresses certain agricultural activities, but the majority are considered nonpoint sources and are exempt from NPDES regulation. Direct sources discharge directly to receiving waters, and indirect sources discharge to POTWs, which in turn discharge to receiving waters. Under the national program, NPDES permits are issued only for direct, point-source discharges. The NPDES has a variety of measures designed to minimize and reduce pollutant discharges. All counties with storm drain systems that serve a population of 50,000 or more, as well as construction sites one acre or more in size, must file for and obtain an NPDES permit.

State

State Water Resources Control Board (SWRCB): Statewide General Waste Discharge Requirements

The General Waste Discharge Requirements specify that all federal and state agencies, municipalities, counties, districts, and other public entities that own or operate sanitary sewer systems greater than one mile in length which collect and/or convey untreated or partially treated wastewater to a publicly owned treatment facility in the State of California need to develop a sewer master plan. The master plan evaluates existing sewer collection systems and provides a framework for undertaking the construction of new and replacement facilities in order to maintain proper levels of service. It includes inflow and infiltration studies to analyze flow monitoring and water use data, a capacity assurance plan to analyze the existing system with existing land use and unit flow factors, a condition assessment and sewer system rehabilitation plan, and a financial plan with recommended capital improvements and financial models.

[2] Impaired water bodies are water bodies that do not meet or are not expected to meet water quality standards.

General Pretreatment Regulations for Existing and New Sources of Pollution

The General Pretreatment Regulations establish the responsibilities of federal, state, and local governments; industry; and the public to implement National Pretreatment Standards to control pollutants that pass through or interfere with treatment processes in publicly owned treatment works or that may contaminate sewage sludge. Pretreatment standards are pollutant discharge limits that apply to industrial users.

Local

City of Sutter Creek Wastewater Master Plan

The City of Sutter Creek Wastewater Master Plan was drafted in November 2012 and was a joint effort between the City of Sutter Creek and the Amador Regional Sanitation Authority (ARSA). Within the plan existing conditions are described and the wastewater management plan for the 25-year planning period was analyzed.

City of Jackson Sewer System Management Plan

Updated in August 2022, this plan was prepared by the Public Works Department of the City of Jackson and described the current sewer conditions, the overflow emergency response plan, and certain control programs for fats oils and grease.

City of Sutter Creek General Plan

The City of Sutter Creek's General Plan (2019) is primarily a policy document that sets goals, policies and programs concerning the community and directs growth and development. In addition, it outlines the programs that were developed to accomplish the goals and policies of the General Plan. Goals and policies related to wastewater systems are outlined below.

- **Policy PS-1.3.1:** New development projects shall upgrade, expand, and/or provide new sewage infrastructure that is sized adequately to meet expected peak flow demands from the development. The sizing of new infrastructure shall be based upon cumulative growth of the region. Reimbursement agreements may be arranged to pay back developers the cost of oversizing to accommodate cumulative growth.

- **Policy PS-1.3.2:** New development projects shall be required to pay for or provide for expansion of the City's sewage treatment facility based upon the expected peak flow demands of said development.

- **Policy PS-1.3.3:** New development projects may buy excess capacity in the sewage treatment facility that is equivalent to the amount of inflow and infiltration they can reduce within the City's existing sewage collection system, if this amount can be determined to the satisfaction of the City.

City of Jackson General Plan

The Jackson General Plan addresses wastewater systems in the Safety Element (Jackson 1981). The Safety Element states that "[t]he company's priority operation is to maintain the present distribution system in good repair. Replacement lines are installed on an "as needed" basis within budgetary capability. The company also works with the developers of new sites in designing the trunk lines and local distribution lines needed to provide service to those areas."

The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Policies related to wastewater systems are outlined here (Jackson 2023).

- **Policy LU 6-3**: Require all development projects to mitigate their infrastructure service impacts or demonstrate that the City's infrastructure, public services, and utilities can accommodate the increased demand for services, and that service levels for existing users will not be degraded or impaired.
- **Policy LU 6-5**: Require the payment of impact fees for new development in accordance with the City's Development Code.

City of Ione General Plan

The City of Ione's General Plan (2009) is primarily a policy document that sets goals, and policies concerning the community and directs growth and development. In addition, it outlines the programs that were developed to accomplish the goals and policies of the General Plan. Goals and policies related to wastewater systems are outlined below.

- **Policy PF-3-1:** Increase efficiencies in water use, wastewater generation and the handling of storm water runoff through best practices in sustainable water management.

Amador Water Agency Wastewater Master Plan Study

The Amador Water Agency Wastewater Master Plan Study was developed to create a single working document for AWA to support residential, commercial, and industrial activities in Amador County as well as to efficiently coordinate capital improvement projects (AWA 2022). The master plan also identifies a time frame, based on priority, and the cost of maintaining, repairing, replacing, upgrading, and installing new sewer system improvements based on the growth forecast and condition, age, and capacity of existing sewer lines.

City of Sutter Creek Municipal Code

Chapter 14.04, *Use of Sewer System*. This chapter outlines when to apply for a sewer connection application, the sewer connection fees, and sewer connection site inspections.

City of Jackson Municipal Code

Chapter 13.20, *Regulations, Connections and Connection Fees*. This chapter describes what is prohibited concerning waste, when connections to public sewer are required, and when users may receive service outside of the corporate limits of the city.

City of Ione Municipal Code

Chapter 13.12, *Use of Public Sewers*. The purpose of this chapter is to describe when sewers are required, the process of disposing waste, and when it is unlawful to dispose of waste.

Existing Conditions

City of Sutter Creek

Wastewater Conveyance

The City of Sutter Creek owns and operates its own wastewater treatment plant, wastewater collection system and associated infrastructure. This includes approximately 30 miles of sanitary sewer lines, ranging from 6 to 15 inches in diameter, and one sewage lift station (Sutter Creek 2020).

Wastewater Treatment

The City of Sutter Creek operates a wastewater treatment plant (WWTP) with a permitted average dry weather flow of 0.48 million gallons per day (mgd) on approximately 5.5 acres (Sutter Creek 2020). The effluent of the WWTP is carried through the Amador Regional Sanitation Authority pipelines, which then discharges into two reservoirs. The wastewater discharged from the WWTP needs to meet the requirements of the Central Valley RWQCB's Order No. 94-152. The plant has a peak capacity of 0.96 mgd and an average annual flow for the years 2014 through 2016 of 0.32 mgd (SCARSA 2017).

City of Jackson

Wastewater Conveyance

The City of Jackson has a service area of approximately 3.51 square miles. The collection system consists of 25.64 miles of gravity sewers and the gravity sewer lines range in size from 6 inches to 16 inches in diameter. (Jackson 2022). The City also operates three (3) lift stations and associated force mains. All wastewater is conveyed to and treated at the City's Wastewater Treatment Plant. The majority of the treatment system was upgraded in 2017 and some subsequent improvements began in 2022 (Jackson 2022).

A lift station is also located on Argonaut HS campus. Most of the existing buildings flow to the lift station at the playfields. The wastewater is then pumped to the sewage manhole located at the intersection of Argonaut Lane and Stony Creek Road. The sewer for the existing shop building flows directly to the manhole at Argonaut Lane and Stony Creek Road (McAllister 2023).

Wastewater Treatment

Jackson has a Wastewater Treatment Plant located at 39 North Highway 49-88, Jackson, CA 95642. The plant is regulated under NPDES Permit No. 0079391 issued by the Central Valley Regional Board Order R5-2018-0036 and R5- 2018-0037 (Jackson 2022). The design daily average flow capacity of the facility is 0.71 mgd (Jackson 2022).

City of Ione

Wastewater Conveyance

The City of Ione provides wastewater collection to residents and businesses within the city limits. Wastewater collected within the city limits is conveyed to the Sutter Creek wastewater treatment plant via the Amador Regional Sanitation Authority, which is a joint powers authority consisting of Amador County, Sutter Creek,

and Amador City formed with the primary purpose of transporting effluent from the Sutter Creek WWTP to the Ione secondary WWTP (Ione 2009).

Wastewater Treatment

The City of Ione operates two wastewater treatment plants: a secondary plant (the Ione secondary WWTP) and a tertiary plant (Castle Oaks Water Reclamation Plant). The City does not have a primary wastewater treatment plant, primary treatment is not a common treatment method for small plants which have secondary treatment as it is easier and more cost efficient to treat high biological oxygen demand sewage in the secondary system rather than incur the expense of constructing a primary treatment system (Ione 2009).

The secondary WWTP is located at the corner of Old Stockton Road and Marlette Street. The plant currently treats city wastewater as well as the backwash water from AWA. The average daily flow at Ione Secondary WWTP is 0.35 mgd and the capacity is 0.55 mgd (Ione 2009).

5.17.1.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project:

U-1 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.

U-3 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.

5.17.1.3 ENVIRONMENTAL IMPACTS

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.17-1: Wastewater facilities would not be able to accommodate project-generated sewer demands. [Threshold U-1]

School Closure/Consolidation Program

The proposed project includes consolidating eight campuses into six campuses. The campuses are serviced by three sewer systems within three different jurisdictions that each convey wastewater to three different wastewater treatment plants. Therefore, each school is analyzed as it relates to the jurisdiction that it is within. The campuses and their related jurisdiction are shown below:

- City of Jackson
  - Jackson Junior High School
  - Jackson Elementary School
  - Argonaut High School

- City of Ione
  - Ione Elementary School
  - Ione Junior High School
- City of Sutter Creek
  - Amador High School
  - Sutter Creek Elementary School (includes Sutter Creek Primary)

Table 5.17-1, City of Jackson – Existing and Projected Wastewater Generation, Table 5.17-2, City of Ione – Existing and Projected Wastewater Generation, and Table 5.17-3, City of Sutter Creek – Existing and Projected Wastewater Generation, show the existing and proposed wastewater generation for the proposed project. As further discussed below, implementation of the proposed project would be **potentially significant**.

Level of Significance Before Mitigation: Potentially Significant.

Argonaut High School Site Improvements

Construction

As described in Chapter 3, *Project Description*, site improvements would be required and would therefore necessitate the construction of new, on-site sewer lines. Construction impacts associated with the installation of the sewer lines would primarily involve trenching to place the lines below the surface and would be limited to the project site, with minor off-site work associated with connections to nearby sewer connections. This analysis focuses on whether the City of Jackson would need to expand its wastewater facilities in order to handle the demand generated by the proposed project.

Prior to ground disturbance, project contractors would coordinate with the City of Jackson to identify the locations and depth of all sewer lines. Project contractors would notify the City of Jackson in advance of proposed ground disturbance activities to avoid sewer lines and disruption of sewer service. Therefore, temporary construction work in the public right-of-way to connect wastewater lines would not create a significant environmental effect.

Additionally, wastewater generation would not occur during the construction phase of the proposed project. Construction workers would utilize portable restrooms, which would dispose of wastewater offsite and would not contribute to wastewater flows to the City of Jackson's wastewater system. The wastewater generated by construction workers would be pumped and disposed of offsite, and therefore, the waste would not enter onsite sewer facilities that connect to the City's sewer system. Additionally, this wastewater generation would be temporary and cease upon the completion of construction activities. Thus, construction of the proposed project would not require or result in the relocation or construction of new or expanded wastewater infrastructure or result in wastewater generation from construction activities and impacts would be less than significant.

Operation

As shown in Table 5.17-1, *City of Jackson – Existing and Projected Wastewater Generation,* while Argonaut HS would generate an increase of 14,202 gallons per day (gpd) of wastewater, the proposed project would generate a net increase of approximately 12,834 gpd of wastewater within the City of Jackson due to the reduced enrollment at Jackson Junior HS. A sewer generation rate of 18 gpd/student was used per the "Institutional" wastewater unit flow factor in the City of Sutter Creek and Amador Regional Sanitation Authority's Wastewater Master Plan Update (HydroScience, 2017). It should be noted that the wastewater generation rate used in this analysis is highly conservative and relates to peak flow rates used for the design of sewer lines.

Sewer from the proposed two-story, ten-classroom building would connect to the sewer line serving the existing shop building and gravity flow directly to the manhole at the intersection of at the intersection of Argonaut Lane and Stony Creek Road. The new building would not add additional sewage to the City operated lift station at the project site (McAllister 2023).

Table 5.17-1 City of Jackson - Existing and Projected Wastewater Generation

School Name	Existing Student Enrollment	Proposed Student Capacity	Sewer Generation Rate (gpd/student)	Existing Sewer Generation (gdp)[1]	Proposed Sewer Generation (gdp)[1]
Jackson Junior High School[2]	346	195	18	6,228.0	3,510.0
Jackson Elementary School[3]	500	575	18	9,000.0	10,350.0
Argonaut High School	536	1,325	18	9,648.0	23,850.0
Total	**1,382**	**2,095**	**-**	**24,876.0**	**37,710.0**

Notes:
gpd = gallons per day.
1. Existing sewer generation is derived by multiplying the sewer generation rate by the existing enrollment. The proposed sewer generation is derived by multiplying the sewer generation rate by the proposed student capacity.
2. Proposed enrollment capacity would be less than existing capacity.
3. While the student enrollment would increase, the proposed enrollment capacity and existing enrollment capacity would remain the same.

The proposed development would comply with the City of Jackson connection fee requirements to provide financing for the ongoing maintenance and operation of the sanitary sewer systems, including capital replacement costs. However, even with these measures in place, impacts would be **potentially significant** due to the increased amount of wastewater that is entering the City of Jackson's wastewater conveyance system.

Level of Significance before Mitigation: Potentially Significant.

Ione Junior High School Site Improvements

Construction

As described in Chapter 3, *Project Description*, site improvements would be required and would therefore necessitate the construction of new, on-site sewer lines. Construction impacts associated with the installation of the sewer lines would primarily involve trenching to place the lines below the surface and would be limited to the project site, with minor off-site work associated with nearby sewer connections. This analysis focuses on whether the City of Ione would need to expand its wastewater facilities in order to handle the demand generated by the proposed project.

Prior to ground disturbance, project contractors would coordinate with the City of Ione to identify the locations and depth of all sewer lines. Project contractors would notify the City of Ione in advance of proposed ground disturbance activities to avoid sewer lines and disruption of sewer service. Therefore, temporary construction work in the public right-of-way to connect wastewater lines would not create a significant environmental effect.

Additionally, wastewater generation would not occur during the construction phase of the proposed project. Construction workers would utilize portable restrooms, which would dispose of wastewater offsite and would not contribute to wastewater flows to the City of Ione's wastewater system. The wastewater generated by construction workers would be pumped and disposed of offsite, and therefore, the waste would not enter onsite sewer facilities that connect to the City's sewer system. Additionally, this wastewater generation would be temporary and cease upon the completion of construction activities. Thus, construction of the proposed project would not require or result in the relocation or construction of new or expanded wastewater infrastructure or result in wastewater generation from construction activities and impacts would be less than significant.

Operation

As shown in Table 5.17-2, *City of Ione – Existing and Projected Wastewater Generation,* while the Ione Junior HS would result in an increase in wastewater generation by 7,344 gpd, the proposed project in the City of Ione would generate a net decrease of approximately 2,088 gallons per day (gpd) of wastewater due to the closure of Ione ES. It should be noted that the wastewater generation rate used in this analysis is highly conservative and relates to peak flow rates used for the design of sewer lines.

Table 5.17-2 City of Ione - Existing and Projected Wastewater Generation

School Name	Existing Student Enrollment	Proposed Student Capacity	Sewer Generation Rate (gpd/student)	Existing Sewer Generation (gdp) [1]	Proposed Sewer Generation (gdp) [1]
Ione Elementary School	524	0	18	9,432.0	0
Ione Junior High School	393	801	18	7,074.0	14,418.0
Total	**917**	**801**	**-**	**16,506.0**	**14,418.0**

Notes:
gpd = gallons per day.
1. Existing sewer generation is derived by multiplying the sewer generation rate by the existing enrollment. The proposed sewer generation is derived by multiplying the sewer generation rate by the proposed student capacity.

The proposed development would comply with the City of Ione connection fee requirements to provide financing for the ongoing maintenance and operation of the sanitary sewer systems, including capital replacement costs. However, even with these measures in place, impacts would be **potentially significant** due to the increased amount of wastewater that is entering the City of Ione's wastewater conveyance system.

Level of Significance before Mitigation: Potentially Significant.

Sutter Creek Elementary School Site Improvements

Construction

As described in Chapter 3, *Project Description*, site improvements would be required and would therefore necessitate the construction of new, on-site sewer lines. Construction impacts associated with the installation of the sewer lines would primarily involve trenching to place the lines below the surface and would be limited to the project site, with minor off-site work associated with nearby sewer connections. This analysis focuses on whether the City of Sutter Creek would need to expand its wastewater facilities in order to handle the demand generated by the proposed project.

Prior to ground disturbance, project contractors would coordinate with the City of Sutter Creek to identify the locations and depth of all sewer lines. Project contractors would notify the City of Sutter Creek in advance of proposed ground disturbance activities to avoid sewer lines and disruption of sewer service. Therefore, temporary construction work in the public right-of-way to connect wastewater lines would not create a significant environmental effect.

Additionally, wastewater generation would not occur during the construction phase of the proposed project. Construction workers would utilize portable restrooms, which would dispose of wastewater offsite and would not contribute to wastewater flows to the City of Sutter Creek's wastewater system. The wastewater generated by construction workers would be pumped and disposed of offsite, and therefore, the waste would not enter onsite sewer facilities that connect to the City's sewer system. Additionally, this wastewater generation would be temporary and cease upon the completion of construction activities. Thus, construction of the proposed project would not require or result in the relocation or construction of new or expanded wastewater infrastructure or result in wastewater generation from construction activities and impacts would be less than significant.

Operation

As shown in Table 5.17-3, based on the number of students and generation factors, the proposed project would generate a net increase of approximately 7,527 gpd of wastewater in the City of Sutter Creek. Sutter Creek ES, specifically, would result in an increase of 7,578 gpd of wastewater generation. It should be noted that the wastewater generation rate used in this analysis is highly conservative and relates to peak flow rates used for the design of sewer lines.

Table 5.17-3 City of Sutter Creek – Existing and Projected Wastewater Generation

School Name	Existing Student Enrollment	Proposed Student Capacity	Sewer Generation Rate (gpd/student)	Existing Sewer Generation (gdp) [1]	Proposed Sewer Generation (gdp) [1]
Amador High School[2]	702	875	18	12,636.0	15,750.0
Sutter Creek Elementary School	204	625	18	3,672.0	11,250.0
Sutter Creek Primary School	176	0	18	3,168.0	0
Total	**1,082**	**1,500**	**-**	**19,476**	**27,000.0**

Notes:
gpd = gallons per day.
1. Existing sewer generation is derived by multiplying the sewer generation rate by the existing enrollment. The proposed sewer generation is derived by multiplying the sewer generation rate by the proposed student capacity.
2. While the student enrollment would increase, the proposed enrollment capacity and existing enrollment capacity would remain the same.

The proposed development would comply with the City of Sutter Creek connection fee requirements to provide financing for the ongoing maintenance and operation of the sanitary sewer systems, including capital replacement costs. However, even with these measures in place, impacts would be **potentially significant** due to the increased amount of wastewater that is entering the City of Sutter Creek's wastewater conveyance system.

Level of Significance before Mitigation: Potentially Significant.

Impact 5.17-2: Project-generated wastewater would not be adequately treated by the wastewater service provider for the project. [Threshold U-3]

School Closure/Consolidation Program

As discussed in Impact 5.17-1, the eight existing schools associated with the proposed project are serviced by three sewer systems within three different jurisdictions that each convey wastewater to three different wastewater treatment plants. As further discussed in more detail below, the implementation of the proposed project would result in a **potentially significant impact**.

Level of Significance Before Mitigation: Potentially significant.

Argonaut High School Site Improvements

The Jackson's Wastewater Treatment Plant is required by federal and state law to meet applicable standards of treatment plant discharge requirements subject to NPDES No. 0079391. The permit includes the conditions needed to meet minimum applicable technology-based requirements. The NPDES permit regulates the amount and type of pollutants that the system can discharge into receiving waters. The City of Jackson's Wastewater Treatment Plant is operating in compliance with and would continue to operate subject to state waste discharge requirements and federal NPDES permit requirements, as set forth in the NPDES permit and order. Wastewater from the school uses proposed by the project would not contain substances of any types and amount prohibited by the City of Jackson discharge limits. Discharging oil or petroleum products to the sewer would be prohibited. Thus, project-generated wastewater would not adversely affect the City of Jackson's Wastewater Treatment Plant compliance with its NPDES permit.

The proposed project would generate a net increase of 12,834 gpd[3] of sewer that needs to be treated at Jackson's Wastewater Treatment Plant, which has a current treatment capacity of 0.71 million gallons per day (mgd). The proposed project would add an additional 0.013 mgd of wastewater to be treated at Jackson's Wastewater Treatment Plant, which is approximately 2 percent of the capacity of Jackson's Wastewater Treatment Plant. Therefore, due to the negligible increase in wastewater generation compared to the capacity of the treatment plant, no new or expanded water reclamation plant facilities would be needed. However, while the City of Jackson currently has adequate capacity to serve the project's projected demand, there are infiltration and associated inflow issues at the project site and impacts would be **potentially significant**.

Level of Significance Before Mitigation: Potentially significant.

Ione Junior High School Site Improvements

The proposed project would generate a net decrease of approximately 2,088 gallons per day[4] of sewer that would be treated at the Ione secondary WWTP, which has an average daily flow of 0.35 mgd and a capacity of 0.55 mgd, which means that there is a residual capacity of 0.2 mgd. Due to Ione ES closing, there would be an overall decrease in sewer to the Ione secondary WWTP as part of the proposed project. Therefore, the proposed project would not contribute to an increase in sewage flow.

Additionally, wastewater from the school uses proposed by the project would not contain substances of any types and amount prohibited by the City of Ione discharge limits. Discharging oil or petroleum products to the sewer would be prohibited. Therefore, impacts would be **less than significant.**

Level of Significance Before Mitigation: Less than significant impact.

Sutter Creek Elementary School Site Improvements

The City of Sutter Creek Wastewater Treatment Plant is required by federal and state law to meet applicable standards of treatment plant discharge requirements subject to NPDES No. 94-152. The permit includes the conditions needed to meet minimum applicable technology-based requirements. The NPDES permit regulates the amount and type of pollutants that the system can discharge into receiving waters. The City of Sutter Creek Wastewater Treatment Plant is operating in compliance with and would continue to operate subject to state waste discharge requirements and federal NPDES permit requirements, as set forth in the NPDES permit and order. Wastewater from the school uses proposed by the project would not contain substances of any types and amount prohibited by the City of Sutter Creek's Wastewater Treatment Plant discharge limits. Discharging oil or petroleum products to the sewer would be prohibited. Thus, project-generated wastewater would not adversely affect compliance with the Central Valley Region RWQCB's Order No. 94-152.

[3] This includes all schools within the City of Jackson (i.e., Jackson Junior HS, Jackson ES, and Argonaut HS).
[4] This includes all schools within the City of Ione (i.e., Ione ES and Ione Junior HS).

Additionally, the proposed project would generate 7,524 gpd[5] of sewer that needs to be treated at the City of Sutter Creek Wastewater Treatment Plant, which has a residual capacity of 0.16 mgd. The proposed project would therefore add 0.02 mgd of wastewater to the wastewater treatment plant which is within the residual capacity of the wastewater treatment plant and impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than significant impact.

5.17.1.4 MITIGATION MEASURES

Impact 5.17-1

USS-1 Prior to the start of construction, the ACUSD shall prepare site-specific water/wastewater infrastructure studies for the Argonaut HS, Ione Junior HS, and Sutter Creek ES to analyze the proposed improvements at these sites. The water/wastewater infrastructure studies shall include:

- A detailed analysis of the peak wet weather sewer flow rates and volume over time to determine if there is the potential for surcharge conditions due to improvements and additional students at the three school sites. The analysis will include an investigation of inflow and infiltration issues and anticipated flows to lift-stations, sewer lines, and sewer meters. Estimated wastewater generation shall be calculated using the generation rates developed for the City of Sutter Creek Amador Regional Sanitation Authority's Wastewater Master Plan, California Green Building Standards and other applicable references that are approved by the Cities of Jackson, Ione, and Sutter Creek. If improvements at the school sites result in an exceedance of the permitted peak wet weather flows for the sewer system, the infrastructure studies shall identify measures that reduce peak wet weather flows to acceptable limits.

  The sewer infrastructure studies for Argonaut HS, Ione Junior HS, and Sutter Creek ES shall be submitted to the Public Works Departments of the cities of Jackson, Ione, and Sutter Creek, respectively, for review and approval. No grading permits shall be issued until the proposed sewer infrastructure design for each school site has been approved by the city or agency within its jurisdiction and sewer system improvements have been approved, if necessary. Payment of development impact fees may also be required per local regulations.

- An evaluation of the water capacity of existing water service lines, water meters, and distribution pipelines and anticipated water demands at the three school sites to determine if the capacities of the Ione water system and the Tanner water system are adequate to accommodate the additional water demands. The infrastructure study would also include an evaluation of fire service and/or fire hydrant requirements. If the increased water demands at the school sites result in an exceedance of the capacity of the water treatment systems or distribution systems, the studies shall identify necessary upgrades or

[5] This includes all schools within the City of Sutter Creek (i.e., Amador HS and Sutter Creek ES).

modifications to the water distribution systems. The ACUSD shall be responsible for the payment of additional capacity fees as deemed appropriate by the water providers. If the water infrastructure studies show that there is a net increase in water demand at the school sites, the ACUSD will obtain a Will Serve letter from the Amador Water Agency (AWA).

The water infrastructure studies for Argonaut HS, Ione Junior HS, and Sutter Creek ES shall be submitted to the Amador Water Agency for review and approval. No grading permits shall be issued until approval and will serve letters have been obtained from the water service providers.

Impact 5.17-2

Implement Mitigation Measure USS-1.

5.17.1.5 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact 5.17-1

Mitigation Measure USS-1 requires the preparation of infrastructure studies that would assess the proposed project's wastewater generation and determine appropriate actions to mitigate sewer system capacity issues. Therefore, impacts related to wastewater conveyance would be reduced to **less than significant with mitigation**.

Impact 5.17-2

Mitigation Measure USS-1 requires the preparation of infrastructure studies that would assess the proposed project's wastewater generation and determine appropriate actions to mitigate sewer system capacity issues. Therefore, impacts related to wastewater treatment would be reduced to **less than significant with mitigation**.

5.17.1.6 CUMULATIVE IMPACTS

The area considered for cumulative impacts to wastewater treatment is the City of Jackson, City of Sutter Creek and the City of Ione's service areas. The area considered for cumulative impacts to wastewater conveyance systems is the City of Jackson, City of Sutter Creek and the City of Ione's service area and the County's sewer system service area.

As shown in Table 5-17.1, 5-17.2, and 5-17.3, the proposed project would increase wastewater generation in the three service areas by 21,438 gpd. While this number is conservative due to the wastewater generation rate that was used, there could be potentially significant impacts on certain cities wastewater conveyance systems. However, with the implementation of mitigation measure USS-1, infrastructure studies would be done for Argonaut HS, Ione Junior HS, and Sutter Creek ES to determine if the proposed project will cause sewer system capacity impacts. If it is determined that the proposed project would cause exceedance of the permitted peak wet weather flows for the sewer system, infrastructure studies shall identify measures that reduce peak wet weather flows to acceptable limits. Additionally, the ACUSD would have to pay a sewer connection fee, sewer impact and improvement fee, and sewer assessment fee pursuant to each cities municipal code as applicable.

Sewer collection system expansions and upgrades would be based on the individual needs identified in each city's Sewer Management Plan. Additionally, all future development within each cities service area would be reviewed on a project-by-project basis to verify that existing capacity exists to convey the wastewater generated by the new development and whether construction of new sewer lines would result in significant environmental effects. Through the use of connection fees and agreements, the three cities will be able to maintain and expand their wastewater collection systems as necessary and ensure that new developments pay their fair-share costs associated with increased demand, including development that may require General Plan amendments. Therefore, there would be no significant cumulative impacts on wastewater collection.

Level of Significance Before Mitigation: Less than significant impact.

5.17.2 Water Supply and Distribution Systems

5.17.2.1 ENVIRONMENTAL SETTING

Regulatory Background

Federal, state, and local laws, regulations, plans, or guidelines related to water supply and distribution systems and potentially applicable to the proposed project are summarized below.

Federal

Federal Safe Drinking Water Act

The Safe Drinking Water Act, the principal federal law intended to ensure safe drinking water for the public, was enacted in 1974 and has been amended several times since it came into law. The Act authorizes the EPA to set national standards for safe drinking water, called the National Primary Drinking Water Regulations, to protect against both naturally-occurring and man-made contaminants. These standards set enforceable maximum contaminant levels in drinking water and require all water providers in the United States to treat water to remove contaminants, except for private wells serving fewer than 25 people. In California, the State Water Resource Control Board (SWRCB) conducts most enforcement activities. If a water system does not meet its standards, then it is the water supplier's responsibility to notify its customers.

State

California Urban Water Management Planning Act

The Urban Water Management Planning Act requires urban water suppliers to prepare an urban water management plan (UWMP) if they provide water for municipal purposes to more than 3,000 customers or provide more than 3,000 acre-feet per year (afy) of water. The intent of the UWMP is to assist water supply agencies in water resource planning given their existing and anticipated future demands. The UWMP must include a water supply and demand assessment that compares total water supply available to the water supplier with the total projected water use over a 20-year period. It is also mandatory that UWMPs be updated every five years.

California Senate Bill 610 and 221

Senate Bill (SB) 610 and SB 221 were amended in 2001 to assure coordination between the local water and land use decisions to confirm that California cities and communities are provided with adequate water supply. Specific projects are required to prepare a Water Supply Assessment (WSA). The WSA is composed of information regarding existing and forecasted water demands, as well as information pertaining to available water supplies for the new development.

The following projects are required to prepare a WSA:

- Residential developments consisting of more than 500 homes, or
- A business employing more than 1,000 people or having more than 500,000 square feet;
- A commercial office building employing more than 1,000 people or having more than 250,000 square feet of floor space;
- A hotel having more than 500 rooms;
- An industrial complex with more than 1,000 employees and occupying more than 40 acres of land; or
- A mixed-use project that requires the same or greater amount of water as a 500 dwelling-unit project.

SB 221 requires written verification that there is sufficient water supply available for new residential subdivisions that include over 500 dwelling units or meet the other requirements listed above. The verification must be provided before construction of the project begins. The proposed project does not need to prepare a WSA or written verification per SB 221 as it does not meet the identified thresholds for which compliance is required (i.e., the project proposes fewer than 500 dwelling units and less than 500,000 square feet of business (commercial use).

The Water Conservation Act of 2009 (Senate Bill X7-7)

The Water Conservation Act of 2009, SB X7-7, requires all water suppliers to increase water use efficiency. The legislation sets an overall goal of reducing per capita water use by 20 percent by 2020, with an interim goal of a 10 percent reduction in per capita water use by 2015. Effective in 2016, urban retail water suppliers who do not meet the water conservation requirements established by this bill are not eligible for state water grants or loans. SB X7-7 requires that urban water retail suppliers determine baseline water use and set reduction targets according to specified standards; it also requires that agricultural water suppliers prepare plans and implement efficient water management practices.

20x2020 Water Conservation Plan

The 20x2020 Water Conservation Plan of 2010 was a byproduct of the Water Conservation Act of 2009. The plan had a threefold effect, establishing: 1) a benchmark of current usage per capita off 2005 baseline data; 2) an intermediate goal for all water providers to meet by 2015; 3) a 20 percent reduction by 2020 of water usage.

Assembly Bill 1668 and Senate Bill 606

On May 31, 2018, Governor Brown signed two bills (Assembly Bill 1668 and Senate Bill 606) that established long-term standards for water suppliers. The bills called for the creation of new urban efficiency standards for indoor use, outdoor use, and water lost to leaks as well as any appropriate variances for unique local conditions.

The SWRCB will adopt these standards by regulation no later than June 30, 2022. The indoor water use standard will be 55 gallons per person per day until January 2025; the standard will become stricter over time, decreasing to 50 gallons per person per day in January 2030. The outdoor water use standard will be based on land cover, climate, and other factors determined by the Department of Water Resources and the SWRCB. The SWRCB will adopt the outdoor standard by June 2022 and the water leaks standard by July 2020 pursuant to prior legislation (SB 555, 2015).

Mandatory Water Conservation

Following the declaration on July 15, 2014, of a state of emergency due to drought conditions, the SWRCB adopted Resolution No. 2014-0038 for emergency regulation of statewide water conservation efforts. These regulations, which went into effect on August 1, 2014, were intended to reduce outdoor urban water use and persuade all California households to voluntarily reduce their water consumption by 20 percent. Water companies with 3,000 or more service connections were required to report monthly water consumption to the SWRCB. The SWRCB readopted the regulations several times until Governor Brown issued Executive Order B-40-17 in April 2017, ending the drought emergency and directing the SWRCB to rescind portions of its existing drought emergency water conservation regulations but maintain the portions that prohibit wasteful water use practices until permanent requirements are in place. The prohibitions that are still in effect address: 1) the application of potable water to outdoor landscapes in a manner that causes excess runoff; 2) the use of a hose to wash a motor vehicle except where the hose is equipped with a shut-off nozzle; 3) the application of potable water to driveways and sidewalks; 4) the use of potable water in nonrecirculating ornamental fountains; and 5) the application of potable water to outdoor landscapes during and within 48 hours after measurable rainfall. Also, urban water suppliers are still required to submit monthly water monitoring reports to the SWRCB (SWRCB 2014).

Governor's Drought Declarations

Governor Gavin Newsom declared a drought state of emergency on April 21, 2021, and asked state agencies to partner with local water districts and utilities to make Californians aware of drought and encourage actions to reduce water usage by promoting the Department of Water Resources' (DWR) Save Our Water Campaign and other water conservation programs. The proclamation also included measures to be implemented by the DWR, SWRCB, the Department of Fish and Wildlife, and the Department of Food and Agriculture that included coordinated state and local actions to address issues stemming from continued dry conditions.

The governor issued subsequent drought emergency proclamations on May 10, July 8, and October 19 of 2021, and March 28, 2022. The latest proclamation required that the SWRCB adopt emergency regulations by May 25, 2022, including the requirement that all urban water suppliers that have Water Shortage Contingency Plans implement Level 2 shortage response actions. Level 2 shortage response actions are meant to address a water supply shortage up to 20 percent. The Level 2 requirements for urban water suppliers take effect on June 10, 2022. SWRCB also banned the irrigation of non-functional turf at commercial, industrial, and institutional properties with potable water, with an exception of low water use turf. Non-functional turf is solely ornamental and does not apply to turf used for recreation, sports, or civic or community events.

State Water Resources Control Board Resolution No. 2022-002

On January 4, 2022, the SWRCB adopted an emergency regulation by resolution. On January 18, 2022, the emergency regulation became effective and remains in effect for one year from the effective date unless the SWRCB acts to end, modify, or readopt it. The emergency regulation requirements include:

- Turning off decorative water fountains.
- Turning off/pausing irrigation systems when it rains and for two days after rain.
- Using an automatic shut-off nozzle on water hoses.
- Using a broom, not water, to clean sidewalks and driveways.
- Giving trees just what they need and avoid overwatering.

Water Conservation in Landscaping Act of 2006 (AB 1881)

The Water Conservation in Landscaping Act of 2006 (AB 1881) required the DWR to update the State Model Water Efficient Landscape Ordinance by 2009. The state's model ordinance was issued on October 8, 2009. Under AB 1881, cities and counties are required to adopt a state updated model landscape water conservation ordinance by January 31, 2010, or to adopt a different ordinance that is at least as effective in conserving water as the updated model ordinance. It also requires reporting on the implementation and enforcement of local ordinances, with required reports due by December 31, 2015.

2015 Update of the State Model Water Efficient Landscape Ordinance (Executive Order B-29-15)

To improve water savings in the landscaping sector, the DWR updated the Model Ordinance in accordance with Executive Order B-29-15. The Model Ordinance promotes efficient landscapes in new developments and retrofitted landscapes. The Executive Order called for revising the Model Ordinance to increase water efficiency standards for new and retrofitted landscapes through more efficient irrigation systems, greywater usage, and on-site stormwater capture, and by limiting the portion of landscapes that can be covered in turf.

New development projects that include landscaped areas of 500 square feet or more—including residential, commercial, industrial, and institutional projects that require a permit, plan check, or design review—are subject to the Model Ordinance. The previous landscape-size threshold for new development projects ranged from 2,500 square feet to 5,000 square feet.

Local

Amador Water Agency Urban Water Management Plan

The proposed project is within the existing service area of the AWA. The AWA is required to prepare an Urban Water Management Plan (UWMP) for its service areas pursuant to Water Code Sections 10610 through 10656 of the Urban Water Management Planning Act, effective January 1, 1984. The Urban Water Management Planning Act requires all urban water suppliers to prepare, adopt, and file a UWMP with the DWR every five years. The AWA 2020 UWMP outlines the current water demands, sources, and supply reliability to the County by forecasting water use based on climate, demographics, and land use changes in the County. The plan also details the Water Shortage Contingency Plan used in case of shortage emergencies. The plan assesses the reliability of AWA's water sources which include groundwater and surface water supplies.

Amador Water Agency Water Code

Revised in 2021, the Amador Water Agency Code describes the rules and regulations that need to be followed to gain water supply and associated services from Amador Water Agency. The provisions that are outlined in the code apply to the Amador Water Agency's entire service area (AWA 2021c). Some of the relevant codes are listed in Section 2.06, *Service Connections*, and Section 4, UN-1 *Water Connection Fee*.

Amador Water Agency Water Shortage Contingency Plan

Adopted in 2021, the Water Shortage Contingency Plan (WSCP) is a document that provides an action plan for Amador Water Agency in the case of an emergency or drought. This WSCP presents the latest information about the annual water supply and demand assessment procedures and describes the Agency's water shortage contingency planning (AWA 2021d).

Amador Water Agency Water Master Plan Study

Adopted in 2021, this study assesses the current conditions of the five potable water distribution systems, evaluates the performance of the three surface WTPs, and provides recommended improvements needed to accommodate growth for the 20-year planning horizon (AWA 2021a). This report also describes the overall system, conducts assessment of the system, and outlines a capital improvement plan.

City of Jackson General Plan

The Jackson General Plan addresses water systems in the Safety Element (Jackson 1981). The Safety Element states that "[t]he company's priority operation is to maintain the present distribution system in good repair. Replacement lines are installed on an "as needed" basis within budgetary capability. The company also works with the developers of new sites in designing the trunk lines and local distribution lines needed to provide service to those areas."

- The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals and policies related to water systems are outlined here (Jackson 2023).**Goal LU-6:** Maintain existing service levels, facilities, and infrastructure, and provide for expansion, extension, or upgrades to meet the needs of new development without adversely impacting existing levels of service or the revenues required to provide them.

- **Policy LU 6-2**: Require development, infrastructure, and long-term planning projects to be consistent with all applicable infrastructure plans, including the Amador Water Agency Urban Water Management Plan and the City's capital improvement programs.

- **Policy LU 6**-1: Provide adequate infrastructure (e.g., streets, sewers, and storm drains) to meet the needs of existing and future development.

- **Policy LU 6-3**: Require all development projects to mitigate their infrastructure service impacts or demonstrate that the City's infrastructure, public services, and utilities can accommodate the increased demand for services, and that service levels for existing users will not be degraded or impaired.

- **Policy LU 6-5**: Require the payment of impact fees for new development in accordance with the City's Development Code.
- **Policy LU 6-6**: Implement the Resource Constraints and Priority Allocation Ordinance to ensure the availability of public resources and services prior to acceptance of new residential and commercial subdivision applications.

City of Sutter Creek General Plan

Goals and objectives related to water systems are outlined below.

- **Policy PS-1.2.1:** The City supports the establishment of an additional water storage facility in the northern area of the City provided it improves fire flows citywide and does not conflict with other General Plan policies and standards.
- **Policy PS-1.2.2:** The Amador Water Agency (AWA) should adjust its "first come, first served" policy of reserving water supplies based upon development projects to include a provision whereby water supplies will be reserved for jurisdictions who adopt reasonable and adequate general plans. The water reserved for such jurisdictions will be based upon the water supply needs identified in said plans. The City and AWA should work together to establish a rate for projecting water demands for commercial, industrial, and institutional uses in the planning area and add that to expected residential demands. These projections should then be reserved for the City.
- **Policy PS-1.2.4:** AWA's Urban Water Management Plan should become a part of the City of Sutter Creek Improvement Standards document consistent with an implementation measure of the Land Use Element.

City of Ione General Plan

Policies related to water systems are outlined below.

- **Policy PF-4.2:** The City shall proactively work with AWA to ensure sufficient water supply for affordable housing projects, consistent with State law requirements.

County of Amador Water Master Plan

The County of Amador's Water Master Plan evaluates all of the Agency's potable water distribution systems and water treatment plants (WTPs) and creates an overall existing system assessment and recommends a path moving forward for the 20-year planning horizon (AWA 2021a). The plan identifies existing and future system deficiencies over a planning period of twenty years and develops a phased Water System Improvement Plan (WSIP).

City of Jackson Municipal Code

- **Section 14.01.030, Amendments to the California Green Building Code.** This section adopts the California Green Building Code and makes amendments to the code that are city specific.

- **Chapter 13.50 Municipal Water System.** This chapter governs the general operation of the Jackson water system to provide an efficient and commercial water supply and includes adopted rates, fees, charges, and administrative and operating regulations.

City of Sutter Creek Municipal Code

- **Section 15.04.010, Adoption of codes and related appendices.** This section adopts the 2019 California Green Building Code.
- **Section 15.04.030, Amendments to the California Green Building Code.** This section makes amendments to the California Green Building Code that include adding an automatic fire sprinkler and using noncombustible roofing material.

City of Ione Municipal Code

- **Chapter 15.28, California Green Building Standards Code.** This chapter adopts the 2019 edition of the California Green Building Standards Code. This chapter also discusses tier voluntary measures, enforcement, and penalties.

Existing Conditions

Water Supply

The AWA owns and operates five potable water distribution systems in Amador County California that consist of three surface water treatment plants (WTPs) and several groundwater wells (AWA 2021a). The water served by the Agency is primarily sourced from the Mokelumne River, although a small portion of the Agency's customers are served with groundwater. (AWA 2021b).

Every urban water supplier is required to assess its reliability to provide water service to its customers under normal, dry, and multiple dry water years. The 2020 UWMP states that AWA will be able to meet projected demands between 2025 and 2045 during normal years, single dry years, and multiple dry years (see Table 5.17-4).

Table 5.17-4 Normal, Single Dry, and Multiple Dry Year Supply and Demand (afy)

	2025	2030	2035	2040	2045
Normal Year					
Supply Totals	19,803	20,042	20,050	20,057	20,065
Demand Totals	8,937	9,335	9,425	9,488	9,567
Surplus	**10,866**	**10,707**	**10,625**	**10,569**	**10,498**
Single Dry Year					
Supply Totals	19,803	20,042	20,050	20,057	20,065
Demand Totals	8,937	9,335	9,425	9,488	9,567
Surplus	**10,866**	**10,707**	**10,625**	**10,569**	**10,498**
Multiple Dry Year					
Year 1					
Supply Totals	19,803	20,042	20,050	20,057	20,065
Demand Totals	8,937	9,335	9,425	9,488	9,567
Surplus	**10,866**	**10,707**	**10,625**	**10,569**	**10,498**
Year 2					
Supply Totals	19,803	20,042	20,050	20,057	20,065
Demand Totals	8,937	9,335	9,425	9,488	9,567
Surplus	**10,866**	**10,707**	**10,625**	**10,569**	**10,498**
Year 3					
Supply Totals	19,803	20,042	20,050	20,057	20,065
Demand Totals	6,703	7,001	7,069	7,116	7,175
Surplus	**13,100**	**13,041**	**12,981**	**12,941**	**12,890**
Year 4					
Supply Totals	19,803	20,042	20,050	20,057	20,065
Demand Totals	6,703	7,001	7,069	7,116	7,175
Surplus	**13,100**	**13,041**	**12,981**	**12,941**	**12,890**
Year 5					
Supply Totals	19,803	20,042	20,050	20,057	20,065
Demand Totals	6,703	7,001	7,069	7,116	7,175
Surplus	**13,100**	**13,041**	**12,981**	**12,941**	**12,890**

Source: AWA 2021b

Water Distribution System

The AWA delivery system consists of approximately 167 miles of treated and untreated water main piping and 24 miles of conveyance canals. AWA supplies both raw and treated water to customers within its service area (AWA 2021b). The AWA service area covers over 450 square miles and serves the communities of Amador City, Ione, Sutter Creek, Sutter Hill, Drytown, Martell, and their vicinities, and portions of Ridge Road and New York Ranch Road on a retail basis (AWA 2021b). The City of Ione is serviced by AWA's Ione Distribution System, and the City of Sutter Creek is serviced by AWA's Tanner Distribution System (AWA 2021a).

The City of Jackson purchases treated water from AWA and conveys water though the City's water distribution system. The City's Department of Water Resources carefully monitors the City's transmission lines and reservoirs and maintains the City-wide distribution system. This includes maintaining water mains, fire hydrants, valves, and water services from mains to individual meter boxes (Jackson 2023).

5.17.2.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project:

U-1 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.

U-2 Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years.

5.17.2.3 ENVIRONMENTAL IMPACTS

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.17-3: Water facilities would not be able to accommodate project-generated utility demands. [Threshold U-1]

School Closure/Consolidation Program

The proposed project includes consolidating eight campuses into six campuses. The campuses are serviced by three separate water distribution systems within three different cities. The City of Ione is serviced by AWA's Ione Distribution System, the City of Sutter Creek is serviced by AWA's Tanner Distribution System, and the City of Jackson is serviced by the City's own water distribution system. Therefore, each campus is analyzed as it relates to the city that it is within as shown in Impact 5.17-1, and impacts of the proposed project are analyzed below at a city scale. As further discussed below, implementation of the proposed project would result in a **potentially significant impact** to water facilities.

Argonaut High School Site Improvements

Construction

The proposed project would require construction of new, on-site water distribution lines to serve the proposed uses. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below the surface and would be limited to on-site water distribution, with minor off-site work associated with connections to the public main. The construction-related environmental impacts associated with these improvements are analyzed throughout this Draft EIR since it is a component of the proposed project. This analysis focuses on whether the City of Jackson would need to expand its water facilities in order to handle the demand generated by the project.

Prior to ground disturbance, project contractors would coordinate with the City to identify the locations and depth of all lines. The project contractor would notify the City in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Additionally, water needed for construction activities would occur intermittently throughout the construction period, would be temporary in nature, and water required for construction is generally trucked in. Therefore, construction of the proposed project would not require or result in the relocation or construction of new or expanded water infrastructure the construction or relocation of which could cause significant environmental effects and impacts would be **less than significant.**

Operation

The proposed project would require local-serving infrastructure to be appropriately sized and installed within the project site. Water service to the proposed project would continue to be provided by the City of Jackson for domestic and fire protection uses. Prior to the issuance of building permits, the Jackson Fire Department would be required to grant approval of the final building design, including all fire prevention and suppression systems, which would ensure the proposed project is developed pursuant to Fire Code requirements. In addition, on-site water connections would be constructed, as necessary, to comply with the fire flow set for the proposed project by the Jackson Fire Department during the plan check process. All water distribution system connections would comply with Chapter 13.50 of the City's municipal code. Additionally, during the engineering design and plan check process, the City would assess the infrastructure needs of the proposed project to ensure that adequate water infrastructure is available.

As part of the proposed project, 17,133 square feet (sf) of landscaping will be removed at the Argonaut HS site. To calculate the outdoor water demand associated with this landscaping the DWR Water Budget Workbook for New and Rehabilitated Non-Residential Landscapes was used (DWR 2017). A reference evapotranspiration (Et_o) of 50.09 and an annual average rainfall of 29.46 inches was assumed and all existing landscaping was considered to be drip irrigation (AWA 2021b).

As shown in Table 5.17-5, *City of Jackson – Existing and Projected Water Demand,* the City of Jackson will have a net increase in total water demand of 8,456 gpd; specifically, Argonaut HS would result in an increase of 8,943 gpd.

Table 5-17.5 City of Jackson - Existing and Projected Water Demand

School Name	Existing Total Water Demand (gpd)[1]	Existing Indoor Water Demand (gpd)[2]	Existing Outdoor Water Use (gpd)[3]	Proposed Indoor Water Demand (gpd)[4]	Proposed Outdoor Water Use (gpd)[5]
Jackson Junior High School	5,025	2,298	2,727	1,295	3,098
Jackson Elementary School	4,585	3,321	1,264	3,819	1,264
Argonaut High School	17,161	6,469	10,692	15,991	10,133
Total	**27,142**	**12,087**	**15,054**	**21,104**	**14,494**

Source: CalEEMod 2021; AWA 2021b; DWR 2017.
[1] This number was calculated from using individual water bills for a 12-month period from each school.
[2] Indoor water demand was calculated by multiplying the current student enrollment by the following indoor water demand rates from the CalEEMod 2021 Default Data Tables: "Elementary School" rate of 6.6 gpd/student; the "Junior High School" Rate of 6.6 gpd/student, and the "High School" rate of 12.1 gpd/student.
[3] This number was calculated from subtracting the indoor water demand from the total water demand.
[4] Indoor water demand was calculated by multiplying the proposed student capacity by the following indoor water demand rates from the CalEEMod 2021 Default Data Tables: "Elementary School" rate of 6.6 gpd/student; the "Junior High School" Rate of 6.6 gpd/student, and the "High School" rate of 12.1 gpd/student.
[5] Outdoor water use remains unchanged except at Argonaut High School. The water demand associated with the removal of landscaping at this school site was subtracted from the existing outdoor water demand to calculate the proposed outdoor water demand.

The design of the proposed project would meet requirements set forth in CalGreen and AWA water use efficiency measures, including separately metering landscaping greater than 5,000 square feet, and consideration of whether recycled water use is feasible. However even with these requirements, the water distribution system might not be able to handle the increase in water demand. Therefore, the effects are **potentially significant**.

Level of Significance Before Mitigation: Potentially Significant.

Ione Junior High School Site Improvements

Construction

The proposed project would require construction of new, on-site water distribution lines to serve the proposed uses. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below the surface and would be limited to on-site water distribution, with minor off-site work associated with connections to the public main. The construction-related environmental impacts associated with these improvements are analyzed throughout this Draft EIR since it is a component of the proposed project. This analysis focuses on whether AWA would need to expand its water facilities in order to handle the demand generated by the project.

Prior to ground disturbance, project contractors would coordinate with AWA to identify the locations and depth of all lines. The project contractor would notify AWA in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Additionally, water needed for construction activities would occur intermittently throughout the construction period, would be temporary in nature, and water required for construction is generally trucked in. Therefore, construction of the proposed project would not require or result in the relocation or construction of new or expanded water infrastructure the construction or relocation of which could cause significant environmental effects. Therefore, impacts would be **less than significant**.

Operation

The proposed project would require local-serving infrastructure to be appropriately sized and installed within the project site. Water service to the proposed project would continue to be provided by AWA for domestic and fire protection uses. Prior to the issuance of building permits, the Ione Fire Department would be required to grant approval of the final building design, including all fire prevention and suppression systems, which would ensure the proposed project is developed pursuant to Fire Code requirements. In addition, on-site water connections would be constructed, as necessary, to comply with the fire flow set for the proposed project by the Ione Fire Department during the plan check process. All water connections would also meet the requirements of Section 2.06, Service Connections, and Section 4, UN-1 Watter Connection Fee of the Amador *Water Agency Water Code* (AWA 2021c). Additionally, during the engineering design and plan check process, the City and the AWA would assess the infrastructure needs of the proposed project to ensure that adequate water infrastructure is available.

As part of the proposed project, 3,000 sf of landscaping would be added at the Ione Junior HS. To calculate the outdoor water demand associated with this landscaping the DWR Water Budget Workbook for New and Rehabilitated Non-Residential Landscapes was used (DWR 2017). An Et_o of 50.09 and an annual average rainfall of 29.46 inches was assumed and all new landscaping was considered a Special Landscape Area[6] (AWA 2021b).

As shown in Table 5-17.6, *City of Ione – Existing and Projected Water Demand,* the City of Ione will have a net decrease in total water demand of 4,074 gpd, however Ione Junior HS would result in an increase of 3,146 gpd.

Table 5-17.6 City of Ione - Existing and Projected Water Demand

School Name	Existing Total Water Demand (gpd)[1]	Existing Indoor Water Demand (gpd)[2]	Existing Outdoor Water Use (gpd)[3]	Proposed Indoor Water Demand (gpd)[4]	Proposed Outdoor Water Use (gpd)[5]
Ione Elementary School	7,220	3,480	3,740	0	0
Ione Junior High School	14,273	2,610	11,664	5,320	12,099
Total	**21,493**	**6,090**	**15,403**	**5,320**	**12,099**

Source: CalEEMod 2021; AWA 2021b; DWR 2017.

1 This number was calculated from using individual water bills for a 12-month period from each school.

2 Indoor water demand was calculated by multiplying the current student enrollment by the following indoor water demand rates from the CalEEMod 2021 Default Data Tables: "Elementary School" rate of 6.6 gpd/student; the "Junior High School" Rate of 6.6 gpd/student, and the "High School" rate of 12.1 gpd/student.

3 This number was calculated from subtracting the indoor water demand from the total water demand.

4 Indoor water demand was calculated by multiplying the proposed student capacity by the following indoor water demand rates from the CalEEMod 2021 Default Data Tables: "Elementary School" rate of 6.6 gpd/student; the "Junior High School" Rate of 6.6 gpd/student, and the "High School" rate of 12.1 gpd/student.

5 Outdoor water use remains unchanged except at Argonaut High School. The water demand associated with the removal of landscaping at this school site was subtracted from the existing outdoor water demand to calculate the proposed outdoor water demand.

6 Special Landscape Areas include vegetable gardens, turf for public recreation, and water features that use recycled water.

The design of the proposed project would meet requirements set forth in CalGreen and AWA water use efficiency measures, including separately metering landscaping greater than 5,000 square feet, and consideration of whether recycled water use is feasible. However even with these requirements, the water distribution system might not be able to handle the decrease in water demand. Therefore, the effects are **potentially significant**.

Level of Significance Before Mitigation: Potentially Significant.

Sutter Creek Elementary School Site Improvements

Construction

The proposed project would require construction of new, on-site water distribution lines to serve the proposed uses. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below the surface and would be limited to on-site water distribution, with minor off-site work associated with connections to the public main. The construction-related environmental impacts associated with these improvements are analyzed throughout this Draft EIR since it is a component of the proposed project. This analysis focuses on whether AWA would need to expand its water facilities in order to handle the demand generated by the project.

Prior to ground disturbance, project contractors would coordinate with AWA to identify the locations and depth of all lines. The project contractor would notify AWA in advance of proposed ground disturbance activities to avoid water lines and disruption of water service. Additionally, water needed for construction activities would occur intermittently throughout the construction period, would be temporary in nature, and water required for construction is generally trucked in. Therefore, construction of the proposed project would not require or result in the relocation or construction of new or expanded water infrastructure the construction or relocation of which could cause significant environmental effects Therefore, impacts would be **less than significant**.

Operation

The proposed project would require local-serving infrastructure to be appropriately sized and installed within the project site. Water service to the proposed project would continue to be provided by AWA for domestic and fire protection uses. Prior to the issuance of building permits, the Sutter Creek Fire Protection District (SCFPD) would be required to grant approval of the final building design, including all fire prevention and suppression systems, which would ensure the proposed project is developed pursuant to Fire Code requirements. In addition, on-site water connections would be constructed, as necessary, to comply with the fire flow set for the proposed project by the (SCFPD) during the plan check process. All water connections would also meet the requirements of Section 2.06, Service Connections, and Section 4, UN-1 Watter Connection Fee of the *Amador Water Agency Water Code* (AWA 2021c). Additionally, during the engineering design and plan check process, the City and the AWA would assess the infrastructure needs of the proposed project to ensure that adequate water infrastructure is available.

The proposed project would not affect any of the current landscaping on the school sites. As shown in Table 5-17.7, *City of Sutter Creek – Existing and Projected Water Demand,* the City of Sutter Creek will have a net increase in total water demand of 4,885 gpd, specifically, Sutter Creek ES would result in an increase of 2,796 gpd.

Table 5-17.7 City of Sutter Creek - Existing and Projected Water Demand

School Name	Existing Total Water Demand (gpd)[1]	Existing Indoor Water Demand (gpd)[2]	Existing Outdoor Water Use[3]	Proposed Indoor Water Demand (gpd)[4]	Proposed Outdoor Water Use[5]
Amador High School	27,869	8,472	19,397	10,560	19,397
Sutter Creek Elementary School	8,094	1,355	6,739	4,151	6,739
Sutter Creek Primary	6,983	1,162	5,821	0	0
Total	**42,946**	**10,989**	**31,958**	**14,711**	**26,137**

Source: CalEEMod 2021; AWA 2021b; DWR 2017.

[1] This number was calculated from using individual water bills for a 12-month period from each school, except Sutter Creek Primary. Sutter Creek Primary was estimated from consumption ratio based on Sutter Creek Elementary School.

[2] Indoor water demand was calculated by multiplying the current student enrollment by the following indoor water demand rates from the CalEEMod 2021 Default Data Tables: "Elementary School" rate of 6.6 gpd/student; the "Junior High School" Rate of 6.6 gpd/student, and the "High School" rate of 12.1 gpd/student.

[3] This number was calculated from subtracting the indoor water demand from the total water demand.

[4] Indoor water demand was calculated by multiplying the proposed student capacity by the following indoor water demand rates from the CalEEMod 2021 Default Data Tables: "Elementary School" rate of 6.6 gpd/student; the "Junior High School" Rate of 6.6 gpd/student, and the "High School" rate of 12.1 gpd/student.

[5] Outdoor water use remains unchanged except at Argonaut High School. The water demand associated with the removal of landscaping at this school site was subtracted from the existing outdoor water demand to calculate the proposed outdoor water demand.

The design of the proposed project would meet requirements set forth in CalGreen and AWA water use efficiency measures, including separately metering landscaping greater than 5,000 square feet, and consideration of whether recycled water use is feasible. However even with these requirements, the water distribution system might not be able to handle the increase in water demand. Due to this, the effects are **potentially significant**.

Level of Significance Before Mitigation: Potentially Significant.

Impact 5.17-4: Available water supplies are sufficient to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. [Threshold U-2]

School Closure/Consolidation Program

The proposed project includes consolidating eight campuses into six campuses. The campuses are within three different cities, but all utilize AWA's water supply. Therefore, impacts to water supplies are analyzed across all campuses.

Construction

As no site improvements are proposed at Amador HS and Jackson ES, there would be no construction at these campuses. Since only minor site improvements are proposed at Jackson Junior HS, there would be minimal water use at this school during construction. The site improvements at Argonaut HS, Ione Junior HS, and Sutter Creek ES, construction activities would result in a temporary increase in water demand at the three schools. Water use would be associated with earthwork and soil compaction, dust control, mixing and placement of concrete, equipment and site cleanup, water line testing and flushing, and other related short-term activities. The amount of water used during construction would vary depending on weather, soil conditions, the size of the area under construction, and the specific activities being performed. These activities would occur intermittently throughout the construction period and would be temporary in nature. This short-term and intermittent water use during construction is not expected to be substantial when compared to operational water demands of the three schools.

Additionally, as concluded in AWA's 2020 UWMP for the Amador service area, projected water demand for the County will be met by available supplies during a normal year, single dry year, and multiple dry year hydrological conditions through 2045. Therefore, the proposed project 's construction impacts on water supply would be **less than significant**.

Operation

Development of the proposed project would change the long-term indoor and outdoor water demand associated with public facility consumption for the AWA service area which includes the City of Sutter Creek, the City of Jackson, and the City of Ione.

As part of the proposed project, Ione Junior HS and Argonaut HS would change their outdoor landscaping and the remaining five schools would have no changes to their outdoor landscaping. Between the addition at Ione Junior HS of approximately 3,000 sf of lawn area, and the removal of approximately 17,133 sf of landscaping at Argonaut HS, the proposed project would have an overall net decrease in outdoor water demand of 14,133 sf.

For proposed indoor water demand, CalEEMod water use rates were used (CalEEMod 2021). These water rates are designed for the average daily flows, unlike the wastewater generation rates that were associated with peak flows. As shown in Table 5.17-8, *AWA Service Area – Existing and Proposed Water Demand Total,* the proposed project would generate a net increase of 9,268 gpd of total water demand. This equates to approximately 10 acre-feet per year (afy) of projected total water demand. The analysis was performed using conservative water demand factors and the actual water usage by the project is likely to be much less than the calculated amount, with current and future water conservation measures and compliance with the CalGreen building code.

Table 5.17-8 AWA Service Area – Existing and Proposed Water Demand Total

	Existing Indoor Water Demand (gpd)	Existing Outdoor Water Use (gpd)	Proposed Indoor Water Demand (gpd)	Proposed Outdoor Water Use (gpd)
City of Sutter Creek	10,989	31,958	14,711	26,137
City of Jackson	12,087	15,054	21,104	14,494
City of Ione	6,090	15,403	5,320	12,099
Total	**28,004**	**56,593**	**41,135**	**52,730**

Source: CalEEMod 2021; AWA 2021b; DWR 2017.
gpd = gallons per day.

AWA would be able to meet project water demands, in addition to its current and projected demands for the service areas, with projected supplies from 2020 to 2045 during normal years, single dry years, and multiple dry years (AWA 2021b). The proposed project's total net increase in water demand of 10 afy, is less than 1 percent of the amount of surplus that AWA has according to AWA's Urban Water Management Plan (see Table 5.17-4).

Furthermore, design of the proposed project would meet requirements set forth in CalGreen, as codified in Part 11 of Title 24 of the CCR regarding water efficiency and conservation, which would reduce the estimated water consumption calculated for the project. Water demand calculations did not account for any reduction in

water demand due to the implementation of CalGreen requirements which include low-flow fixtures (not to exceed 1.5 gallons per minute), native landscaping, and dedicated separate landscaping water meters. Additionally, in the event of a water shortage, implementation of AWA's Water Shortage Contingency Plan would ensure that sufficient water supplies were available to serve its customers, including the project and existing and future users (AWA 2021d). It is anticipated that there would be sufficient water supplies to serve the proposed project during normal, dry, and multiple dry years. Therefore, impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than significant.

Argonaut High School Site Improvements

As discussed above, water supply is provided by AWA. The Cities of Sutter Creek, Jackson, and Ione have an interconnected water supply and the impact of improvements at Argonaut HS would have a less than significant on the availability of water supplies.

Level of Significance Before Mitigation: Less than significant.

Ione Junior High School Site Improvements

As discussed above, water supply is provided by AWA. The Cities of Sutter Creek, Jackson, and Ione have an interconnected water supply and the impact of improvements at Ione Junior HS would have a less than significant on the availability of water supplies.

Level of Significance Before Mitigation: Less than significant.

Sutter Creek Elementary School Site Improvements

As discussed above, water supply is provided by AWA. The Cities of Sutter Creek, Jackson, and Ione have an interconnected water supply and the impact of improvements at Sutter Creek ES would have a less than significant on the availability of water supplies.

Level of Significance Before Mitigation: Less than significant.

5.17.2.4 MITIGATION MEASURES

Impact 5.17-3

Implement Mitigation Measure USS-1.

5.17.2.5 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Impact 5.17-3

Level of Significance After Mitigation: Mitigation Measure USS-1 requires the preparation of infrastructure studies for Argonaut HS, Ione Junior HS, and Sutter Creek ES that would assess the proposed project's water

consumption and determine appropriate actions to mitigate water system capacity issues. Thus, impacts related to the water distribution system would be reduced to less than significant with mitigation.

5.17.2.6 CUMULATIVE IMPACTS

Water Infrastructure

The geographic context for the cumulative impact analysis for water infrastructure is the project vicinity. Development of the proposed project and future new development in the project vicinity would cumulatively increase demands on existing water conveyance systems. Due to it being unknown whether the water supply infrastructure can adequality handle the increase in water demand for the proposed project, Mitigation Measure USS-1 would be implemented, which requires the preparation of infrastructure studies that would assess and mitigate any water system capacity issues. Thus, impacts related to water operation would be reduced to less than significant with mitigation.

Furthermore, individual projects would be subject to AWA's water code and projects within the City of Jackson would be subject to the requirements of Chapter 13.50 of the City's municipal code. These requirements outline respective water demands, fire flow, and pressure requirements. AWA and the three Cities would conduct ongoing evaluations to ensure facilities are adequate. AWA's current Water Master Plan includes improvement projects recommended to enhance the reliability of the water distribution system, add redundancy to the system, replace aging facilities, and improve fire flows as well as residual system pressures (AWA 2021a). Therefore, cumulative impacts on the water infrastructure system would be less than significant.

Water Supply

The geographic context for the cumulative impact analysis on water supply is the AWA service area. AWA is required to prepare and update its UWMP every five years to plan and provide for water supplies to serve existing and projected demands over a 20-year horizon. The 2020 UWMP prepared by AWA accounts for existing development within the service area as well as projected growth through the year 2045. Therefore, AWA will be able to reliably provide water to its customers from 2020 through the year 2045.

Compliance with regulatory requirements that promote water conservation, such as AWA's Water Shortage Contingency Plan, the requirements of CALGreen, and implementation of other water saving strategies will assist in ensuring that adequate water supply is available on a cumulative basis. Therefore, it is anticipated that AWA would be able to supply the demands of the proposed project and future growth through 2045 and beyond. Therefore, cumulative impacts on the water supply would be less than significant.

Level of Significance Before Mitigation: Less than significant impact.

5.17.3 Storm Drainage Systems

5.17.3.1 ENVIRONMENTAL SETTING

Regulatory Background

Federal, state, and local laws, regulations, plans, or guidelines related to storm drainage systems and potentially applicable to the proposed project are summarized below.

State

California Porter-Cologne Water Quality Control Act

Under the Porter-Cologne Water Quality Control Act, which was passed in California in 1969 and amended in 2013, the State Water Resources Control Board (SWRCB) has authority over State water rights and water quality policy. This Act divided the State into nine regional basins, each under the jurisdiction of a Regional Water Quality Control Board (RWQCB) to oversee water quality on a day-to-day basis at the local and regional level. RWQCBs engage in a number of water quality functions in their respective regions. RWQCBs regulate all pollutant or nuisance discharges that may affect either surface water or groundwater. The City of Dublin is overseen by the San Francisco Bay RWQCB.

California Urban Water Management Planning Act

Through the Urban Water Management Planning Act of 1983, the California Water Code requires all urban water suppliers within California to prepare and adopt an Urban Water Management Plan (UWMP) and update it every five years. This requirement applies to all suppliers providing water to more than 3,000 customers or supplying more than 3,000 acre-feet of water annually. The Act is intended to support conservation and efficient use of urban water supplies. The Act requires that total project water use be compared to water supply sources over the next 20 years in five-year increments, that planning occur for single and multiple dry water years, and that plans include a water recycling analysis that incorporates a description of the wastewater collection and treatment system within the agency's service area along with current and potential recycled water uses.

CALGreen Building Code (Part 11, Title 24, CCR)

On July 17, 2008, the California Building Standards Commission adopted the nation's first green building standards. The California Green Building Standards Code (Part 11, Title 24, known as "CALGreen") was adopted as part of the California Building Standards Code (Title 24, California Code of Regulations [CCR]) to apply to the planning, design, operation, construction, use, and occupancy of every newly constructed building or structure, unless otherwise indicated in the code, throughout the State of California. CALGreen established planning and design standards for sustainable site development, including water conservation measures and requirements that new buildings reduce water consumption by 20 percent. The mandatory provisions of the California Green Building Code Standards became effective January 1, 2011. The building efficiency standards are enforced through the local building permit process.

The purpose of CALGreen is to improve public health, safety, and general welfare by enhancing the design and construction of buildings through the use of building concepts having a reduced negative impact or positive environmental impact and encouraging sustainable construction practices in the following categories:

- Planning and design
- Energy efficiency
- Water efficiency and conservation
- Material conservation and resource efficiency
- Environmental quality

The California Plumbing Code (Part 5, Title 24, CCR)

The 2010 California Plumbing Code (Part 5, Title 24, CCR) was adopted as part of the California Building Standards Code. The general purpose of the universal code is to prevent disorder in the industry as a result of widely divergent plumbing practices and the use of many different, often conflicting, plumbing codes by local jurisdictions. Among many topics covered in the code are water fixtures, potable and non-potable water systems, and recycled water systems. Water supply and distribution shall comply will all applicable provisions of the current edition of the California Plumbing Code.

Executive Order B-40-17

Executive Order B-40-17, signed by California Governor Brown on April 7, 2017, lifted prior drought-related emergency orders (B-26-13, B-28-14, B-29-15, and B-36-15) and retained certain prohibitions on wasteful practices contained in Executive Order B-37-16, Making Water Conservation a California Way of Life. Permanent restrictions prohibit wasteful water practices including hosing off sidewalks, driveways, and other hardscapes; washing automobiles with hoses not equipped with a shut-off nozzle; using non-recirculated water in a fountain or other decorative water feature; watering lawns in a manner that causes runoff or within 48 hours after measurable precipitation; and irrigating ornamental turf on public street medians. It also mandated that the Department of Water Resources continue work with the SWRCB to develop standards that urban water suppliers will use to set new urban water use efficiency targets as directed in Executive Order B-37-16.

State Updated Model Water Efficient Landscape Ordinance (Assembly Bill 1881)

The updated Model Water Efficient Landscape Ordinance requires cities and counties to adopt landscape water conservation ordinances by January 31, 2010 or to adopt a different ordinance that is at least as effective in conserving water as the updated Model Water Efficient Landscape Ordinance (MWELO). The City of Dublin adopted regulations that promote water conservation and efficient water use within landscape areas consistent with the State MWELO in Chapter 8.88 of the Municipal Code of Dublin.

Regional

Municipal Stormwater NPDES Permit

Stormwater discharges from the County of Amador are regulated under the Waste Discharge Requirements for Municipal Stormwater and Urban Runoff Discharges within the Central Valley Region, issued by the Central Valley Regional Water Quality Control Board. The Permittees are required to effectively prohibit non stormwater discharges into the municipal storm drain system.

Although the proposed project is in Amador County, all California K-12 school districts and community college districts are not currently subject to the requirements of the MS4 Permit. The SWRCB is in the process of expanding the Phase II Small MS4 permit to include school districts and community colleges. Once the amendment is adopted, school districts and community college districts will have five years to comply with the Phase II Small MS4 permit.

The new permit would require school districts and community college districts to develop a Stormwater Management Plan that includes: 1) a map of storm water drainage on school properties, 2) identifying areas throughout the district that could generate stormwater pollution, 3) training staff on stormwater BMPs, 4) continuing to implement the SWRCB's Construction General Permit, 5) designing and building new construction to meet the permit requirements for stormwater runoff quality and quantity, and 6) documenting activities and submitting an annual report to the SWRCB.

Prior to issuance of the new Phase II MS4 permit, the proposed project would be required to comply with the provisions of the SWRCB's post-construction stormwater performance standards. Once the new permit is issued, it is expected that the school districts and community college districts would have to comply with requirements similar to those specified in Section F.5.g—Post Construction Storm Water Management Program (SWMP)—of the existing Phase II MS4 permit. This provision specifies site design and low impact development design standards, source control measures, and sizing criteria for stormwater retention and treatment.

Local

City of Jackson General Plan

The Jackson General Plan addresses storm drainage systems in the Safety Element (Jackson 1981). The Safety Element states that "[i]t is the policy of the City of Jackson: (1) to maintain storm drainage capacity of the floodway along Jackson Creek and its branches; (2) to promote the maintenance of the floodway clear of trash and debris that would detract from the appearance of the area and might reduce the drainage capacity of the natural channel; and (3) to maintain surveillance of the floodways to ensure that encroachments or alterations do not occur which would reduce the drainage capacity of the floodways or alter the forces of the flood waters, creating new erosion patterns which would damage property".

The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals and policies related to storm drainage systems are outlined here (Jackson 2023).

- **Goal LU-6:** Maintain existing service levels, facilities, and infrastructure, and provide for expansion, extension, or upgrades to meet the needs of new development without adversely impacting existing levels of service or the revenues required to provide them.

- **Policy LU 6-3**: Require all development projects to mitigate their infrastructure service impacts or demonstrate that the City's infrastructure, public services, and utilities can accommodate the increased demand for services, and that service levels for existing users will not be degraded or impaired.

- **Policy LU 6-4**: Require the payment of impact fees for new development in accordance with the City's Development Code.

- **Policy LU 6-6**: Implement the Resource Constraints and Priority Allocation Ordinance to ensure the availability of public resources and services prior to acceptance of new residential and commercial subdivision applications.

- **Action LU-6a:** As part of the development review process, determine the potential impacts of development and infrastructure projects on public infrastructure, and ensure that new development contributes its fair share toward necessary on and off-site infrastructure.

- **Action LU-6b:** Ensure that infrastructure is adequately sized to accommodate the proposed development and, if applicable, allow for extensions to future developments.

- **Action LU-6d**: When community-desired facilities and services are beyond the City's financial resources to provide, support community-driven efforts to establish special funding and financing districts, such as assessment districts, landscape and lighting maintenance districts, business improvement districts, or community facilities districts, whether citywide or limited to a defined neighborhood, district, or corridor.

Jackson Municipal Code

Projects within the City of Jackson must also comply with the following requirements of the City's Municipal Code:

- **17.30.050 Drainage and Storm Water Runoff.** All applications for a Zoning Clearance, Development Permit, Minor Use Permit, or Use Permit, except single-family dwellings, secondary residential units, and duplexes, shall include drainage and erosion control plans, which shall be submitted to the Engineering Department for review. This section establishes runoff treatment and erosion-control measures and standards prescribed to reduce impacts associated with runoff. In addition, this chapter provides watercourse protection measures, including maintenance, timing of operations, and limitations on runoff standards to ensure the proper conveyance, treatment, and disposal of stormwater.

- **17.40.040.15 Stormwater Management and Rainwater Retention.** This chapter requires the inclusion of BMPs into landscape and grading design plans to minimize runoff and increase on-site rainwater retention and infiltration.

- **17.40.040.7 Grading Design Plan.** For the efficient use of water, grading of a project site shall be designed to minimize soil erosion, runoff, and water waste. A grading plan shall be submitted as part of the Landscape Documentation Package to illustrate the height of graded slopes, drainage patterns, pad elevations, finished grades, and stormwater retention improvements, if applicable. A comprehensive grading plan prepared by a civil engineer for other local agency permits satisfies this requirement, with adherence to Ordinance 725 Section 3, 2022.

- **13.20.170 Prohibited Sewage—Stormwater or Washwater.** Stormwater or pavement washwater shall not be introduced into the sanitary sewer system. Connection of roof drains or surface water drains is prohibited. Any person, firm, or corporation having a roof or surface drain now connected shall disconnect

the same within 30 days of the date of the ordinance codified in this chapter. The resultant opening left in the sanitary sewer shall be closed by city maintenance personnel. (Ord. 548 Section 1, 1992; Ord. 334, 1973)

Ione General Plan

- **Policy CO-4.3:** Protect surface and ground water from major sources of pollution, including hazardous materials contamination and urban runoff.
- **Action CO-4.3.1:** Restrict hazardous materials storage in the 100-year flood plain to prevent surface water contamination. (Cross reference NS 5.3)
- **Policy CO-4.4:** Minimize erosion into stream channels resulting from new development in urban areas, consistent with State law. (Cross reference PF 3.1.4)
- **Action CO-4.4.1:** Require development projects to contain urban runoff control strategies and requirements that are consistent with Drainage Master Plans and the City's urban runoff management program.
- **Action CO-4.4.3:** Encourage new development to incorporate features such as grassy swales, multi-use retention or detention basins, and integrated drainage systems to enhance water quality. (Cross reference PF 3.1.5)
- **Action CO-4.4.4:** New development projects shall be required to incorporate the use of best management practices in order to protect receiving waters from the adverse effects of construction activities, sediment, and urban runoff. BMPs shall be developed and incorporated in the project prior to approval by the City.

Ione Municipal Code

Projects within the City of Ione must also comply with the following requirements of the City's Municipal Code:

- **Chapter 18.16.180 – Stormwater Management.** This section requires the implementation of best management practices into the landscape and grading design plans to minimize runoff and to increase on-site retention and infiltration are encouraged. Rain gardens, cisterns, and other landscapes features and practices that increase rainwater capture and create opportunities for infiltration and/or on-site storage are recommended.

Ione's Improvement Standards

Chapter 11 of the City of Ione's Improvement Standards contains the Storm Drainage Design Standards. The standards serve as a guideline for drainage system design and indicate minimum design standards acceptable to the City. Improvement projects shall be protected from inundation, flood hazard, sheet overflow, and ponding of stormwater, springs, and other surface waters. The design of improvements shall be such that water accumulating within the project will be carried away from the project without injury to adjacent improvements, residential sites, or residences to be constructed on sites within the project, or to adjoining areas. Water

accumulating within the project shall be carried to storm drainage facilities or to a natural water course by closed conduit or open channel and shall meet the design standards herein set forth.

Sutter Creek General Plan

- **Policy COS-1.5.2:** To the maximum extent feasible, plants native to the Sutter Creek area that do not require much irrigation should be used for landscaping.

Sutter Creek Municipal Code

- **14.04.230 - Storm or drainage water and the introduction of toxic and other harmful wastes into the sewer system—Prohibited.** This chapter prohibits the discharge of non-stormwater discharges to the City storm drain system.

Existing Conditions

School Closure/Consolidation Program

Jackson ES and Jackson Junior HS are within the Upper Jackson Creek watershed (EPA 2023). The Upper Jackson Creek watershed extends from the City of Jackson to the west, to the end of Pine Grove. Amador HS is within the Lower Sutter Creek watershed (EPA 2023). The Lower Sutter Creek watershed is a narrow straight and extends from where Grass Valley Creek joins Sutter Creek to the east, to the community of Sunnybrook to the south, just before Loch Lane Lake, and below Rancheria Creek to the north. These schools are currently developed with hardscape and impervious surfaces. Currently, runoff is collected via a storm drain inlet (drop inlet and surface drain) and conveyed by an internal storm drain system that connects to the City's existing storm drains.

Argonaut High School

The Argonaut HS project site is within the Middle Jackson Creek watershed (EPA 2023). The Middle Jackson Creek watershed extends from the City of Jackson to the east, just before the Pardee reservoir to the south, to the end of Lake Amador to the west and bounded by State Route 88 to the north.

The Argonaut HS project site is currently developed with hardscape and impervious surfaces encompassing the school buildings and parking lots; the pervious areas include landscaping and play fields. The topography of the project site slopes east to west. Currently, runoff is collected via storm drain inlets and conveyed by an internal storm drain system that connects to the City's existing storm drains.

Ione Junior High School

The Ione Junior HS project site is within the Lower Sutter Creek watershed (EPA 2023).

The Ione Junior HS project site is currently developed with hardscape and impervious surfaces encompassing the school buildings and parking lots; the pervious areas include landscaping and play fields. The topography of the project site is relatively flat. Currently, runoff is collected via a storm drain inlet (drop inlet and surface drain) and conveyed by an internal storm drain system that connects to the City's existing storm drains.

Sutter Creek Elementary School

The Sutter Creek ES project site is also within the Lower Sutter Creek watershed (EPA 2023).

The Sutter Creek ES project site is currently developed with hardscape and impervious surfaces encompassing the school buildings and parking lots; the pervious areas include landscaping and play fields. The topography of the project site is relatively flat. Currently, runoff is collected to the undeveloped grassy/landscaped portions of the site where it gets absorbed into the soil or is directed to a corrugated metal pipe to the City's existing storm drains in the public right of way.

5.17.3.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project:

U-1 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.

5.17.3.3 ENVIRONMENTAL IMPACTS

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.17-5: Existing storm drain facilities would be not able to accommodate project-generated storm water flows and would require or result in the relocation or construction of new or expanded stormwater drainage systems [Threshold U-1]

School Closure/Consolidation Program

The proposed project includes consolidating eight campuses into six campuses. The campuses are within three different cities that each have their own storm drain infrastructure. Therefore, each campus is analyzed as it relates to the city that it is within and impacts are discussed below at a city scale.

Argonaut High School Site Improvements

The project site is already built out with the existing Argonaut HS, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping, track and field, baseball, and softball fields). The proposed project would pave a walkway and construct new driveways and a new classroom building. While the site improvements at Argonaut HS would redevelop only 1.15 acres of the campus, these improvements would increase the impervious surfaces on the project site compared to existing conditions which could generate increased runoff. Due to this, impacts from the proposed project are **potentially significant**.

Level of Significance Before Mitigation: Potentially Significant.

Ione Junior High School Site Improvements

The project site is already built out with the existing Ione Junior HS, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping, track and field, and a baseball field). The site improvements at Ione Junior HS would occur on largely paved/developed areas (over approximately 0.46 acres), where stormwater is presently flows to pervious areas or into the stormwater system. Portions of the development areas are impervious and include vegetation (trees and grasses). The majority of the campus would remain in its current condition. Therefore, the increases in impervious surfaces from the implementation of the site improvements would be minimal. Nevertheless, the site improvements at Ione Junior HS would increase impervious surfaces and remove vegetation and trees that could affect drainage from this area. Due to this, impacts from the proposed project are **potentially significant**.

Level of Significance Before Mitigation: Potentially Significant.

Sutter Creek Elementary School Site Improvements

The project site is already built out with the existing Sutter Creek ES, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping and play structures on uncovered soil). The proposed improvements would occur in an area that currently contains hardscape; thus, no additional impervious surfaces would occur. Stormwater from this area is currently directed to pervious areas of the campus where it infiltrates the soil or is directed to stormwater infrastructure. Since site improvements at Sutter Creek ES would generate similar stormwater and runoff compared to existing conditions, impacts from the proposed project are **less than significant**.

Level of Significance Before Mitigation: Potentially Significant.

5.17.3.4 MITIGATION MEASURES

Impact 5.17-5

USS-2 Prior to the start of construction, the ACUSD shall prepare site-specific pre- and post-development runoff calculations and drainage plans for the Argonaut HS and Ione Junior HS to analyze the proposed improvements at these sites. The pre- and post- development runoff calculations and drainage plans shall include:

- Detailed pre- and post-development runoff calculations and drainage plans to appropriately size drainage improvements (e.g., storm drains, inlets, and pipes) to meet the statewide Construction General Permit (GCP) post-construction requirements. This requires the ACUSD to use non-structural or structural measures to match pre-construction runoff rates for the 85th percentile, 24-hour storm event. The analysis shall also determine the capacity of the existing storm drain systems and any impacts from the proposed improvements. The school sites would be required to comply with storm drain design standards enacted by the cities of Jackson and Ione.

The storm drain infrastructure studies for Argonaut HS and Ione Junior HS shall be submitted to the Public Works Departments of the cities of Jackson and Ione, respectively, for review and approval. The California Department of Transportation, District 10 shall also review and approve the drainage analysis for Ione Junior HS. No grading permits shall be issued until the storm drain design for each school site has been approved and storm drain upgrades or improvements have been approved, if necessary.

5.17.4 Level of Significance After Mitigation

Impact 5.17-5

Level of Significance After Mitigation: Mitigation Measure USS-2 requires the preparation of infrastructure studies for Argonaut HS and Ione Junior HS that would assess and mitigate any storm drain capacity issues. Thus, impacts related to wastewater conveyance would be reduced to less than significant with mitigation.

5.17.4.1 CUMULATIVE IMPACTS

Cumulative projects within the Upper and Middle Jackson Creek watersheds and Lower Sutter Creek watershed could increase impervious areas and increase stormwater runoff rates. The ACUSD and other K-12 school districts and community colleges districts are not currently subject to the requirements of the MS4 Permit. However, all other projects would be required to prepare and implement Water Quality Management Plans (WQMP) that include provisions for the capture and infiltration of runoff or the temporary detention of stormwater runoff in accordance with the NPDES MS4 permit. These BMPs include site design, source control, and treatment control measures that provide both flow control and treatment to runoff before it enters the storm drain system or is discharged into a receiving water body. Any new development would also be subject, on a project-by-project basis, to the applicable level of independent CEQA review as well as City or County design guidelines and other applicable policies and procedures. Thus, no significant cumulative drainage impacts would occur, and cumulative project drainage impacts would be **less than significant**.

5.17.5 Solid Waste

5.17.5.1 ENVIRONMENTAL SETTING

Regulatory Background

Federal, state, and local laws, regulations, plans, or guidelines related to solid waste and potentially applicable to the proposed project are summarized below.

Federal

Resource Conservation and Recovery Act of 1976

The Resource Conservation and Recovery Act of 1976 (Title 40, Part 258 of the Code of Federal Regulations), contains regulations for municipal solid waste landfills and requires states to implement their own permitting programs incorporating the federal landfill criteria. The federal regulations address the location, operation, design (liners, leachate collection, run-off control, etc.), groundwater monitoring, and closure of landfills.

State

California Green Building Standards Code

Section 5.408 (Construction Waste Reduction, Disposal, and Recycling) of CALGreen requires that at least 65 percent of the nonhazardous construction and demolition waste from nonresidential construction operations be recycled and/or salvaged for reuse. CALGreen is updated on a three-year cycle; the 2022 CALGreen took effect on January 1, 2023.

Assembly Bill 939

Assembly Bill (AB) 939 (California Integrated Solid Waste Management Act of 1989; Public Resources Code Section 40050 et seq.) established an integrated waste-management system that focused on source reduction, recycling, composting, and land disposal of waste. AB 939 required every California city and county to divert 50 percent of its waste from landfills by the year 2000. Compliance with AB 939 is measured in part by comparing solid waste disposal rates for a jurisdiction with target disposal rates; actual rates at or below target rates are consistent with AB 939. AB 939 also requires California counties to show 15 years of disposal capacity for all jurisdictions in the county or show a plan to transform or divert its waste.

Assembly Bill 341

AB 341 (Chapter 476, Statutes of 2011) increased the statewide solid waste diversion goal to 75 percent by 2020. AB 341, which was passed in 2011 and took effect July 1, 2012, mandates recycling for businesses producing four or more cubic yards of solid waste per week or multi-family residential dwellings of five or more units. Under AB 341, businesses and multi-family dwellings of five or more units must separate recyclables from trash and either subscribe to recycling services, self-haul their recyclables, or contract with a permitted private recycler.

Organic Waste Methane Emissions Reduction Act

In September 2016, SB 1383 established methane emissions reduction targets in a statewide effort to reduce emissions of short-lived climate pollutants in various sectors of California's economy. SB 1383 established goals to reduce the landfill disposal of organics by achieving a 50 percent reduction in the 2014 level of statewide disposal of organic waste by 2020 and a 75 percent reduction by 2025. SB 1383 granted CalRecycle the regulatory authority to achieve the organic waste disposal reduction targets and establishes an additional target that at least 20 percent of currently disposed edible food be recovered for human consumption by 2025.

SB 1383 also requires that no later than July 1, 2020, CalRecycle and the California Air Resources Board analyze the progress that the waste sector, state government, and local governments have made in achieving the targets for reducing organic waste in landfills. Depending on the outcome of the analysis, CalRecycle is authorized to amend the regulations to include incentives or additional requirements to meet the goals.

Assembly Bill 1826

Assembly Bill 1826 currently requires businesses and multi-family complexes that generate two or more cubic yards of solid waste, recycling, and organic waste combined per week to start recycling organic waste. Single-family dwellings are not required to have a food waste diversion program. This requirement was instated by CalRecylce to meet the target set by SB 1383.

Assembly Bill 1327

The California Solid Waste Reuse and the Recycling Access Act of 1991 (AB 1327) is codified in Public Resources Code Sections 42900-42911. As amended, AB 1327 requires each local jurisdiction to adopt an ordinance requiring commercial, industrial, institutional, and residential buildings having five or more living units to provide an adequate storage area for the collection and removal of recyclable materials. The size of these storage areas is determined by the appropriate jurisdictions' ordinance.

Local

Amador County Integrated Solid Waste Management Regional Agency

This agency includes Amador City, Amador County, Ione, Jackson, Plymouth, and Sutter Creek.

The goals of this agency are to

- To decrease the amount of solid waste going into disposal facilities by establishing source reduction, recycling, and composting programs.
- To develop goals, policies, and procedures which are consistent with the guidelines and regulations of the California Integrated Waste Management Board.

Amador County Environmental Health Department

This department has been designated by the Department of Resources Recycling and Recovery (CalRecycle) as the Local Enforcement Agency (LEA) for permitting of solid waste handling and disposal facilities (Amador County). The goal of the program is to prevent the spread of diseases, water pollution, air pollution, vectors, public health nuisances and safety hazards (Amador County).

City of Ione General Plan

Goals, objectives, and procedures related to solid waste management are outlined below.

Public Facilities Element

- **Policy PF-7.1:** The City shall work with Amador County, the Regional Agency, and the solid waste contractors to promote solid waste reduction, recycling, and composting of wastes to minimize residential, commercial, and industrial waste disposal.
- **Policy PF-7.2:** The City shall work with the Amador County Solid Waste Regional Agency to enter into franchise agreements for solid waste collection and disposal, consistent with state law.

City of Sutter Creek General Plan

Goals, objectives, and procedures related to solid waste management are outlined below.

- **Objective PS-1.5:** In accordance with the County AB 939 Task Force Source Reduction and Recycling Element and State Assembly Bill 341, increase diversion of total solid waste generated by the City through source reduction, recycling, composting, and special waste management.
- **Policy PS-1.5.1:** The City shall adopt policies for diversion of total solid waste generated by the city.

City of Jackson Municipal Code

- **Chapter 8.04, Solid Waste and Recyclable Collection.** This chapter adopts the city solid waste and recyclables collection ordinance, which regulates the solid waste contractor, the storage of waste, and the transportation of waste.
- **Section 14.04.010, Adoption of Codes and related appendices.** This section adopts the 2022 Edition of the California Green Building Standards Code.
- **Section 14.04.030, Amendments to the California Building Code.** This section outlines amendments to the California Green Building Code.

City of Ione Municipal Code

- **Chapter 8.04, Solid Waste Ordinance.** This chapter outlines the Ione Solid Waste Ordinance, which regulates the business of collecting, transporting, disposing and/or recycling of solid waste. This chapter also ensures compliance with California Health and Safety Code, the mandates of membership in the Amador County Integrated Solid Waste Management Agency, the California Integrated Waste Management Act, and all federal, state and local laws.
- **Section 15.28.010, California Green Building Standards Code—Adopted by reference.** This section adopts the 2019 edition of the California Green Building Standards Code.

City of Sutter Creek Municipal Code

- **Chapter 9.08, Solid Waste.** This chapter outlines the collection and disposal services, as well as the collection and disposal requirements and standards pertaining to solid waste.
- **Section 15.01.010, Adoption of Codes and related appendices.** This section adopts the 2019 Edition of the California Green Building Standards Code.

City of Jackson General Plan

- The Jackson General Plan does not contain policies regarding solid waste in the Safety Element (Jackson 1981). The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals and policies related to solid waste are outlined here (Jackson 2023).**Goal LU-6:** Maintain existing service levels, facilities, and infrastructure, and

provide for expansion, extension, or upgrades to meet the needs of new development without adversely impacting existing levels of service or the revenues required to provide them.

- **Policy LU 6-1:** Provide adequate infrastructure (e.g., streets, sewers, and storm drains) to meet the needs of existing and future development.
- **Policy LU 6-3**: Require all development projects to mitigate their infrastructure service impacts or demonstrate that the City's infrastructure, public services, and utilities can accommodate the increased demand for services, and that service levels for existing users will not be degraded or impaired.
- **Policy LU 6-4:** Require the payment of impact fees for new development in accordance with the City's Development Code.
- **Policy LU 6-6**: Implement the Resource Constraints and Priority Allocation Ordinance to ensure the availability of public resources and services prior to acceptance of new residential and commercial subdivision applications.

Existing Conditions

Solid Waste Collection

Aces Waste Industries (Aces) is a private solid waste collection company that provides weekly collection service for garbage, recycling, and organics within the entire Amador County. Some of the items that can be recycled through the program include glass containers, plastic bottles, newspapers and paper. Aces also provides its customers a curbside yard waste collection service, some of the acceptable items include grass clippings, leaves, and plants (Aces 2023).

Solid Waste Disposal

All solid waste in the three cities is processed through Pine Grove Transfer Station and Warf – Buena Vista Transfer Station and then disposed of in Kiefer Landfill or Forward Landfill (Amador 2016). These facilities are described in Table 5.17-9, *Landfills Service Sutter Creek, Ione, and Jackson*.

Kiefer Landfill has a remaining disposal capacity of approximately 113 million tons and a residential capacity of 8,007 tons per day. Kiefer Landfill has a disposal capacity beyond the 15-year horizon, as required by AB 939. Forward Landfill has a remaining disposal capacity of approximately 25 million tons and a residual capacity of 5,156 tons per day.

Table 5.17-9 Landfills Serving Sutter Creek, Ione, and Jackson

Landfill	Remaining Capacity (tons)[1]	Maximum Permitted Capacity (tons)[1]	Maximum Permitted Throughput (tons per day)	Average Daily Disposal (2022)[2] (tons)	Estimated Closing Date
Forward Landfill 9999 S Austin Road Manteca, CA 95336	24,720,669	59,160,000	8,668	3,512	1/1/2036
Sacramento County Landfill (Kiefer) 12701 Kiefer Blvd, Sloughhouse, CA 95683	112,900,000	117,400,000	10,815	2,808	1/1/2064
Total	**137,620,669**	**176,560,000**	**19,483**	**6,320**	---

Sources: CalRecycle 2023c and 2023d.
1 1 ton = 1 cubic yard
2 Average daily disposal is estimated based on 300 operating days per year. Each facility is open six days per week, Monday through Saturday, except certain holidays.

Compliance with AB 939 is measured in part by actual disposal rates compared to target rates for residents and employees, respectively; actual disposal rates at or below target rates are consistent with AB 939. Target disposal rates for Amador County Integrated Solid Waste Management Agency are 7.7 pounds per day (ppd) per resident and 24.1 ppd per employee (CalRecycle 2022). Actual disposal rates in 2021 were 4.9 ppd per resident and 17.20 ppd per employee (CalRecycle 2022a). Thus, solid waste diversion in Amador County Integrated Solid Waste Management Agency is consistent with AB 939.

5.17.5.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project:

U-4 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.

U-5 Comply with federal, state, and local management and reduction statutes and regulations related to solid waste.

5.17.5.3 ENVIRONMENTAL IMPACTS

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.17-6: Project-generated solid waste would not be 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. [Thresholds U-4]

School Closure/Consolidation Program

The proposed project includes consolidating eight campuses into six campuses. The campuses are within three different cities, but all utilize the same two landfills: Forward Landfill and Sacramento County Landfill (Kiefer).

The three cities are also all governed by the same agency, the Amador County Integrated Solid Waste Management Regional Agency. Therefore, impacts to solid waste facilities are analyzed across all campuses.

Construction

Construction associated with the proposed development would result in solid wastes associated primarily with grading and demolition activities, the removal of organic and other materials potentially detrimental to soil compaction, and exported soils needed to balance the project site. There would be demolition of structures and associated construction demolition debris as well as pavement demolition debris.

The proposed project would be constructed in accordance with the CalGreen, which requires recycling a minimum of 65 percent of the nonhazardous construction and demolition debris (by weight or volume). Furthermore, the requirements of the Jackson Municipal Code Chapter 8.04, Solid Waste and Recyclable Collection, the Ione Municipal Code Chapter 8.04, Solid Waste Ordinance, and the Sutter Creek Municipal Code Chapter 9.08, Solid Waste, would be implemented, including the preparation of a waste management plan for construction activities. Therefore, construction of the proposed project would not be expected to generate solid waste in excess of state and local standards nor exceed the capacity of local infrastructure and impacts from construction waste would be **less than significant**.

Operation

The net increase in solid waste generation during the operational phase is estimated to be 1,015 ppd, as shown in Table 5.17-10, *Net Increase in Solid Waste Generation*.

Table 5.17-10 Net Increase in Solid Waste Generation

School Site	Existing Enrollment	Buildout Capacity	Net Difference	Solid Waste Generation Rate	Solid Waste Generation (ppd)
Amador High School	702	875	173	1 lb/student/day	173
Sutter Creek Elementary School	204	625	421	1 lb/student/day	421
Sutter Creek Primary School	176	0	-176	1 lb/student/day	-176
Jackson Junior High School	346	195	-151	1 lb/student/day	-151
Jackson Elementary School	500	575	75	1 lb/student/day	75
Argonaut High School	536	1325	789	1 lb/student/day	789
Ione Elementary School	524	0	-524	1 lb/student/day	-524
Ione Junior High School	393	801	408	1 lb/student/day	408
				Net Increase	**1,015**

Source: CalRecycle 2023e
Notes: ppd = pounds per day; lb = pounds

As detailed in Table 5.17-9, the landfills serving the Amador County Integrated Solid Waste Management Agency have a residual daily capacity of 13,163 tons per day (or 26 million ppd). The proposed project's estimated 1,015 ppd (or 0.05 tons per day) equates to a fraction of one percent of available capacity of the landfills; therefore, the proposed project would be adequately served by the landfills.

Additionally, proposed development would abide by the requirements of SB 1383, which established targets to achieve a statewide, 50 percent reduction in organic-waste disposal from 2014 levels by 2020 and a 75 percent reduction by 2025. Development would also comply with the requirements of AB 1826, which mandates businesses and multi-family complexes that generate two or more cubic yards of solid waste, recycling, and organic waste combined per week to start recycling organic waste.

Solid waste facilities would be able to accommodate project-generated solid waste. The proposed project would not 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. As such, proposed project impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than significant.

Argonaut High School Site Improvements

As discussed above, solid waste disposal is provided by the Forward Landfill and Sacramento County Landfill (Kiefer) and the impact of improvements at Argonaut HS would have a **less than significant impact** on these two landfills.

Level of Significance Before Mitigation: Less than significant.

Ione Junior High School Site Improvements

As discussed above, solid waste disposal is provided by the Forward Landfill and Sacramento County Landfill (Kiefer) and the impact of improvements at Ione Junior HS would have a **less than significant impact** on these two landfills.

Level of Significance Before Mitigation: Less than significant.

Sutter Creek Elementary School Site Improvements

As discussed above, solid waste disposal is provided by the Forward Landfill and Sacramento County Landfill (Kiefer) and the impact of improvements at Sutter Creek ES would have a **less than significant impact** on these two landfills.

Level of Significance Before Mitigation: Less than significant.

Impact 5.17-7: Project-generated solid waste would comply with federal, state, and local management and reduction statutes and regulations related to solid waste. [Thresholds U-5]

School Closure/Consolidation Program

The proposed project includes consolidating eight campuses into six campuses. The campuses are within three different cities, but all utilize the same two landfills: Forward Landfill and Sacramento County Landfill (Kiefer). The three cities are also all governed by the same agency, the Amador County Integrated Solid Waste Management Regional Agency.

All project-related construction and operation phases would be implemented in accordance with all applicable federal, state, and local laws and regulations governing solid waste disposal. For example, the project would comply with the following federal, state, and local laws and regulations that govern solid waste disposal:

- The Resource Conservation and Recovery Act of 1976 and the Solid Waste Disposal Act of 1965, which govern solid waste disposal.
- AB 939 (Integrated Solid Waste Management Act of 1989; Public Resources Code 40050 et seq.), which required diversion of 50 percent of waste from landfills and required each county to provide landfill capacity for a 15-year period.
- AB 1327 (California Solid Waste Reuse and Recycling Access Act of 1991) requires local agencies to adopt ordinances mandating the use of recyclable materials in development projects.

In addition, as shown in Impact 5.17-9 above, the proposed project's solid waste is adequately accommodated within area landfills serving the project site, and would comply with all applicable federal, state, and local laws. Therefore, impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than significant.

Argonaut High School Site Improvements

As discussed above, Argonaut HS would be serviced by Forward Landfill and Sacramento County Landfill (Kiefer), and would comply with all applicable federal, state, and local laws. Therefore, the impact of improvements at Argonaut HS would have a **less than significant**.

Level of Significance Before Mitigation: Less than significant

Ione Junior High School Site Improvements

As discussed above, Ione Junior HS would be serviced by Forward Landfill and Sacramento County Landfill (Kiefer), and would comply with all applicable federal, state, and local laws. Therefore, the impact of improvements at Ione Junior HS would have a **less than significant**.

Level of Significance Before Mitigation: Less than significant.

Sutter Creek Elementary School Site Improvements

As discussed above, Sutter Creek ES would be serviced by Forward Landfill and Sacramento County Landfill (Kiefer), and would comply with all applicable federal, state, and local laws. Therefore, the impact of improvements at Sutter Creek ES would have a **less than significant**.

Level of Significance Before Mitigation: Less than significant.

5.17.5.4 MITIGATION MEASURES

No mitigation measures are required.

5.17.5.5 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required, the level of significance for each impact would remain unchanged.

5.17.5.6 CUMULATIVE IMPACTS

The area considered for cumulative impacts is the area serviced by the two landfills listed in Table 5.17-9. Collectively, the landfills have a remaining disposal capacity of approximately 13,163 tons per day. Sacramento County Landfill (Kiefer) landfill also has a disposal capacity beyond the 15-year horizon, as required by AB 939 to account for future demand and ensure adequate capacity. Additionally, all cumulative projects would divert construction waste per CalGreen requirements, and abide by the requirements of SB 183, AB 1826, and AB 341 as applicable. Thus, there is sufficient landfill capacity in the region for the cumulative increase in solid waste disposal. Therefore, cumulative impacts would be less than significant, and project impacts would not be cumulatively considerable.

Level of Significance Before Mitigation: Less than significant impact.

5.17.6 Other Utilities

5.17.6.1 ENVIRONMENTAL SETTING

Regulatory Background

State

California Energy Commission

The California Energy Commission (CEC) was created in 1974—as the California Energy Resources Conservation and Development Commission—to be the state's principal energy planning organization and meet the energy challenges of the 1973 oil embargo. The CEC is charged with six basic responsibilities when designing state energy policy:

- Forecast statewide electricity needs.
- License power plants to meet those needs.
- Promote energy conservation and efficiency measures.
- Develop renewable energy resources and alternative energy technologies.
- Promote research, development, and demonstration.
- Plan for and direct the state's response to energy emergencies.

California Energy Benchmarking and Disclosure (AB 802)

On October 8, 2015, AB 802 directed the CEC to establish a statewide energy benchmarking and disclosure program and enhanced the CEC's existing authority to collect data from utilities and other entities for the purposes of energy forecasting, planning, and program design. Among the specific provisions, AB 802 requires utilities to maintain records of the energy usage data of all buildings to which they provide service for at least the most recent 12 complete months. AB 802 requires each utility, upon the request and authorization of the

owner, owner's agent, or operator of a covered building, to deliver or provide aggregated energy usage data for a covered building to the owner, owner's agent, operator, or to the owner's account in the Energy Star Portfolio Manager, subject to specified requirements. AB 802 also authorized the CEC to specify additional information to be delivered by utilities for certain purposes.

California Building Code: Building Energy Efficiency Standards

Energy conservation standards for new residential and non-residential buildings were adopted by the CEC in June 1977. Title 24 requires the design of building shells and building components to conserve energy, with standards updated periodically to allow for consideration and possible incorporation of new energy efficiency technologies and methods. The 2019 Building Energy Efficiency Standards went into effect January 1, 2020.

The 2019 standards move toward cutting energy use in new homes by more than 50 percent and require installation of solar photovoltaic systems for single-family homes and multifamily buildings of three stories or less. The 2019 standards focus on four key areas: 1) smart residential photovoltaic systems; 2) updated thermal envelope standards (preventing heat transfer from the interior to exterior and vice versa); 3) residential and nonresidential ventilation requirements and; 4) nonresidential lighting requirements. Under the 2019 standards, nonresidential buildings are 30 percent more energy efficient compared to the 2016 standards, and single-family homes are 7 percent more energy efficient. When accounting for the electricity generated by the solar photovoltaic system, single-family homes use 53 percent less energy compared to homes built to the 2016 standards.

California Building Code: CALGreen

CALGreen was adopted as part of the California Building Standards Code and established planning and design standards for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), as well as water conservation and material conservation, both of which contribute to energy conservation. The 2019 CALGreen standards became effective January 1, 2020.

2012 Appliance Efficiency Regulations

The 2012 Appliance Efficiency Regulations (20 CCR Sections 1601 through 1608) include standards for both federally regulated appliances and non-federally regulated appliances. Though these regulations are now often viewed as "business as usual," they exceed the standards imposed by all other states, and they reduce energy demand as well as GHG emissions.

State Greenhouse Gas Regulations

Current State of California guidance and goals for reductions in GHG emissions from stationary sources are generally embodied in Executive Orders S-03-05 and B-30-15, AB 32 and AB 197, and SB 32. While these regulations are aimed at reducing GHG emissions, they have a direct relationship to energy conservation. A detailed discussion of these regulations is provided in Section 5.7, Greenhouse Gas Emission, of the EIR.

Local

City of Sutter Creek General Plan

Objectives and policies related to electricity, natural gas, and telecommunication facilities are outlined below.

- **Policy PS-1.11.1:** New development shall be served by electric power and natural gas, telephone, and high speed communications.
- **Policy PS-1.11.4:** New development projects shall be required to dedicate or set aside adequate right-of-way to accommodate cable routes and equipment housings for present and future public utility networks.

City of Jackson General Plan

The Jackson General Plan addresses the community's infrastructure and services needs in the Land Use Element. Policies related to infrastructure and telecommunication facilities are outlined here (Jackson 2008).

- **Policy 1.1**: The City shall ensure, through implementation of the Resource Constraints and Priority Allocation Ordinance, the availability of public resources and services prior to acceptance of new residential and commercial subdivision applications.
- **Policy 1.4**: In order to curtail urban sprawl, expansion of the City by annexation shall focus on areas where infrastructure currently exists or is easily extended.

The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Policies related to telecommunication facilities are outlined here (Jackson 2023).

- **Policy LU 6-3**: Require all development projects to mitigate their infrastructure service impacts or demonstrate that the City's infrastructure, public services, and utilities can accommodate the increased demand for services, and that service levels for existing users will not be degraded or impaired.
- **Policy LU 6**-4: Require the payment of impact fees for new development in accordance with the City's Development Code.

City of Jackson Municipal Code

- **Section 17.58.025, Telecommunication Facilities.** This section establishes standards for the development and operation of telecommunications facilities including cellular wireless communication facilities, satellite antennae, single pole/tower amateur radio antennae, and television and radio broadcasting towers. This Section applies to all new construction of such facilities within the City, and any modification or relocation of such equipment and facilities.

City of Ione Municipal Code

- **Chapter 17.64, Wireless Communication Facilities.** This chapter outlines the regulations that wireless communication facilities shall be subject to and establishes standards for placement of telecommunications facilities within the city and regulates the installation of antennas and other wireless communication facilities consistent with federal law. This chapter also promotes and protects the public safety and public welfare of residents as well as containing regulations to minimize potential impacts of the installation of wireless communication facilities.

City of Sutter Creek Municipal Code

- **Chapter 18.49, Telecommunication and Electrical Generating Towers.** This chapter establishes standards for the development and operation of telecommunication and electrical generating towers. This chapter applies to all telecommunication towers including cellular wireless communications towers, single pole/tower amateur radio antennas, and television and radio broadcasting towers; and to all electrical generating towers including tower-mounted solar arrays and wind turbines.

Existing Conditions

The project site is within the service area of Pacific gas and Electric Company (PG&E) and would be served by the existing electrical transmission lines.

Electricity

PG&E's service area spans much of Northern California—from Santa Barbara and Kern counties in the south to Humboldt County in the west to Tuolumne County in the north. By 2030, PG&E is projected to deliver 97,882 gigawatt-hours (GWh). In 2021, 93 percent of electricity came from greenhouse gas free resources (PG&E 2023a)

Natural Gas

PG&E provides natural gas service to the three cities that encompass the project sites. PG&E's service system stretches from Eureka in the North to Bakersfield in the South and from the Pacific Ocean in the west to the Sierra Nevada in the east (PG&E 2023b). The project sites are within the service area of PG&E.

Telecommunications

Communication services are offered regionally by franchised telecommunications providers, such as AT&T and Spectrum.

5.17.6.2 THRESHOLDS OF SIGNIFICANCE

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if the project:

U-1 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.

5.17.6.3 ENVIRONMENTAL IMPACTS

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.17-8: Existing facilities would be able to accommodate project-generated utility demands for electricity, natural gas, and telecommunications. [Threshold U-1]

School Closure/Consolidation Program

The proposed project includes consolidating eight campuses into six campuses. The campuses are within three different cities, but all utilize the same electricity and natural gas provider, PG&E. Communication services are also offered regionally by franchised telecommunications providers, such as AT&T and Spectrum. Therefore, impacts are analyzed across all campuses.

Electricity

Construction

As no site improvements are proposed at Amador HS and Jackson ES, there would be no construction at these schools. Since only minor site improvements are proposed at Jackson Junior HS, there would be minimal electricity use during construction activities at this school. Given the site improvements at Argonaut HS, Ione Junior HS, and Sutter Creek ES, construction activities associated with the land uses accommodated under the proposed project would require electricity use to power the construction equipment. The electricity use during construction would vary during different phases of construction; most of the construction equipment during grading would be gas or diesel powered, and later construction phases would require electricity-powered equipment such as nail guns for interior construction and sprayers for architectural coatings. Overall, the use of electricity would be temporary and would fluctuate according to the phase of construction. It is anticipated that most of the 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. Electrical energy would be available for use during construction from the existing power lines and connections available in the project site, potentially including temporary power poles. Therefore, impacts would be less than significant.

Operation

Electricity service to the project sites that include school improvements would be provided by PG&E through connections to existing off-site electrical lines. While implementation of the proposed improvements might cause an increase in energy, all improvements would be all-electric and more energy efficient on a per square foot basis than the existing structures on any of the individual sites due to their compliance with updated building code requirements. Furthermore, as described in Chapter 5. 5, *Energy*, the proposed improvements would be designed to be all-electric buildings. Encouraging sustainable and energy-efficient building practices and using more renewable energy strategies would further reduce building-related per capita energy consumption after buildout of the campus improvements and move closer toward achieving zero net energy. Because the proposed project would provide features to decrease electricity use, the proposed development would not require PG&E to obtain new or expanded electricity supplies; impacts would be less than significant.

Natural Gas

Implementation of the proposed project would not generate an increase in natural gas since the campus improvements would encompass only all-electric buildings. Furthermore, the new buildings would be consistent

with the requirements of the Building Energy Efficiency Standards and would not result in an increase in natural gas consumption from existing conditions.

Therefore, the proposed project would not result in a substantial increase in natural gas demands and PG&E would not need to expand their supply and transmission facilities in order to handle the demand generated by the proposed project. Therefore, impacts would be less than significant.

Telecommunications

Infrastructure supporting telecommunications services would be provided and installed onsite. Concealed wireless telecommunications facilities would be installed pursuant to the requirements of the Jackson, Sutter Creek, and Ione Municipal Codes. Installation of telecommunication infrastructure would result in physical impacts to the surface and subsurface of the project site. These impacts are part of the project's construction phase and are evaluated throughout this Draft EIR. Furthermore, a number of franchised telecommunications providers are available in the region and no significant expansion or construction of the telecommunications network is anticipated. Therefore, impacts would be less than significant.

Level of Significance Before Mitigation: Less than Significant.

Argonaut High School Site Improvements

Existing science classrooms on campus are expected to use natural gas for educational purposes. The increase in student enrollment at Argonaut HS would generate more electricity and natural gas demand at campus level. However, since the proposed project would not increase student enrollment within the District, the District's natural gas and electricity demand would remain the same. Therefore, the proposed project would continue to require similar energy demand as existing conditions.

As discussed above, Argonaut HS would be serviced by regional electricity, natural gas, and telecommunication providers and the impact of improvements at Argonaut HS would have a **less than significant impact** on these services.

Level of Significance Before Mitigation: Less than significant.

Ione Junior High School Site Improvements

Existing science classrooms on campus are expected to use natural gas for educational purposes. The increase in student enrollment at Ione Junior HS would generate more electricity and natural gas demand at campus level. However, since the proposed project would not increase student enrollment within the District, the District's natural gas and electricity demand would remain the same. Therefore, the proposed project would continue to require similar energy demand as existing conditions.

As discussed above, Ione Junior HS would be serviced by regional electricity, natural gas, and telecommunication providers and the impact of improvements at Ione Junior HS would have a **less than significant impact** on these services.

Level of Significance Before Mitigation: Less than significant.

Sutter Creek Elementary School Site Improvements

The increase in student enrollment at Sutter Creek ES would generate more electricity demand at campus level. However, since the proposed project would not increase student enrollment within the District, the District's electricity demand would remain the same. Therefore, the proposed project would continue to require similar energy demand as existing conditions.

As discussed above, Sutter Creek ES would be serviced by regional electricity, natural gas, and telecommunication providers and the impact of improvements at Sutter Creek ES would have a **less than significant impact** on these services.

Level of Significance Before Mitigation: Less than significant.

5.17.6.4 MITIGATION MEASURES

No mitigation measures are required.

5.17.6.5 LEVEL OF SIGNIFICANCE AFTER MITIGATION

No mitigation measures are required, level of significance for each impact would remain unchanged.

5.17.6.6 CUMULATIVE IMPACTS

Like the proposed project, each cumulative project could increase electricity and natural gas demands. The CEC electricity demand forecasts are based on climate zones; economic and demographic growth forecasts from Moody's Analytics, IHS Global Insight, and the California Department of Finance; forecast electricity rates; effects of reasonably foreseeable energy efficiency and energy conservation efforts; anticipated partial electrification of portions of the transportation sector, including increasing adoption of light-duty plug-in electric vehicles; and demand response measures, such as electricity rates that increase during high-demand times of day; and effects of climate change (CEC 2016). Natural gas demand forecasts are based on economic outlook, California Public Utilities Commission–mandated energy efficiency standards and programs, renewable electricity goals, and conservation savings linked to Advanced Metering Infrastructure. It is anticipated that electricity and natural gas demands by most other projects would be accounted for in the above-referenced demand forecasts.

Like the proposed project, future development would install infrastructure supporting telecommunications services pursuant to the requirements of each city's Municipal Code.

Given the already urbanized character of the area, new conveyance facilities would not significantly alter land use patterns to the extent that construction of new electrical, natural gas, or telecommunications facilities would be warranted. Additionally, other projects would be subject to independent CEQA review, including analysis of impacts to electricity, natural gas, and telecommunication facilities. Implementation of all feasible mitigation measures would be required for any significant impacts identified. Therefore, cumulative impacts would be **less than significant**, and project impacts would not be cumulatively considerable.

Level of Significance Before Mitigation: Less than significant impact.

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5. Environmental Analysis
UTILITIES AND SERVICE SYSTEMS

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5.18 WILDFIRE

This section of the Draft Environmental Impact Report (DEIR) evaluates the potential for implementation of the proposed project to exacerbate wildfires.

5.18.1 Environmental Setting

5.18.1.1 REGULATORY BACKGROUND

Federal

National Fire Protection Association Standards

National Fire Protection Association (NFPA) codes, standards, recommended practices, and guides are developed through a consensus standards development process approved by the American National Standards Institute. NFPA standards are recommended (advisory) guidelines in fire protection but are not laws or "codes" unless adopted or referenced as such by the California Fire Code (CFC) or local fire agency. Specific standards applicable to wildland fire hazards includes, but are not limited to:

- **NFPA 1142,** Water Supplies for Suburban and Rural Fire Fighting
- **NFPA 1143,** Wildland Fire Management
- **NFPA 1144,** Reducing Structure Ignition Hazards from Wildland Fire
- **NFPA 1710,** Standard for the Organization and Development of Fire Suppression Operations, Emergency Medical Operations

State

CAL FIRE

The California Department of Forestry and Fire Protection (CAL FIRE) is dedicated to the fire protection and stewardship of over 31 million acres of California's wildlands. The Board of Forestry and Fire Protection is a regulatory body within CAL FIRE. It is responsible for developing the general forest policy of the state, determining the guidance policies of the department, and representing the State's interest in federal forestland in California. The Board of Forestry and Fire Protection also promulgates regulations and reviews general plan safety elements that are adopted by local governments for compliance with statutes. Together, the Board and CAL FIRE protect and enhance the forest resources of all the wildland areas of California that are not under federal jurisdiction.

Office of State Fire Marshal

The California Office of the State Fire Marshal supports the mission of CAL FIRE by focusing on fire prevention. Its fire safety responsibilities include: regulating buildings in which people live, congregate, or are confined; controlling substances and products that may, in and of themselves, or by their misuse, cause injuries, death, and destruction by fire; providing statewide direction for fire prevention in wildland areas; regulating hazardous liquid pipelines; developing and reviewing regulations and building standards; and providing training

and education in fire protection methods and responsibilities. These achievements are accomplished through major programs, including engineering, education, enforcement and support from the State Board of Fire Services.

California Government Code

The State of California maintains responsibility for the prevention and suppression of wildfires on land outside incorporated boundaries of a city. In 1991, the State legislature adopted the Bates Bill (Government Code Sections 51175–51189) after the fires in the Oakland Hills. The bill requires CAL FIRE to identify and classify areas in local responsibility areas (LRA) that have a "very high fire severity" hazard for wildfires. LRAs are areas where local governments have the primary responsibility for preventing and suppressing fires. A local agency is required to adopt CAL FIRE's findings within 120 days of receiving recommendations from CAL FIRE, pursuant to Government Code Section 51178(b), or propose modifications in accordance with state law. The very high fire hazard severity zones (FHSZ) are currently being updated, due in part to the 2017 fire season.

California Fire Code

The CFC is a series of building, property, and lifeline codes in the California Code of Regulations, Title 24, Chapter 9. The CFC contains fire-safety-related building standards, such as construction standards, vehicular and emergency access, fire hydrants and fire flow, sprinkler requirements, etc. Specific chapters relevant to wildfire include Chapter 49, Requirements for Wildland-Urban Interface, and Chapter 7A of the California Building Code, Materials and Construction Methods for Exterior Wildfire Exposure.

Wildland-Urban Interface Areas

Chapter 49 of the California Fire Code, Requirements for Wildland Urban Interface Fire Areas, applies to any geographical area identified as a FHSZ by CAL FIRE. It defines FHSZs, connects to the SRA Fire Safe Regulation requirements for defensible space, and parallels requirements for wildfire protection buildings construction and hazardous vegetation fuel management in other sections of the California Code of Regulations and the Public Resources Code. Chapter 49 of the 2022 California Fire Code, which went into effect January 1, 2023, includes a definition for the Wildland-Urban Interface (WUI) and provides requirements for fire protection plans, landslide plans, long-term vegetation management, and creation and maintenance of defensible space for all new development within the WUI.

California Public Resources Code

The Board of Forestry and Fire Protection is authorized in the Public Resources Code (Sections 4290 and 4291) to adopt minimum fire safety standards for new construction in very high FHSZs in state responsibility areas (SRA). The Board published its fire safety regulations in the California Code Regulations, Title 14 (these standards may differ from those in Appendix D of the CFC). Fire safe regulations currently address:

- Article 1: Administration of ordinance and defensible space measures (Chapter 49)
- Article 2: Emergency access and egress standards (roadways) (Appendix D)
- Article 3: Standards for signs identifying streets, roads, and buildings (Chapter 5)

- Article 4: Emergency water standard for fire use (Appendix B, BB)
- Article 5: Fuel modification standards (Chapter 49)

Local ordinances adopted by local governments cannot be less restrictive than the provisions in state law.

California Building Code

The California Building Code requires the installation and maintenance of smoke alarms in residential dwelling units:

- **CCR Title 24, Part 2, Section 907.2.11.2.** Smoke alarms shall be installed and maintained on the ceiling or wall outside of each separate sleeping area in the immediate vicinity of bedrooms. In each room used for sleeping purposes, and in each story within a dwelling unit. The smoke alarms shall be interconnected.

Local

Amador County Unified School District Comprehensive School Safety Plan

The District has Comprehensive School Safety Plans for its schools. The objectives of these plans are to:

- Protect the life and safety of students and staff.
- Provide a framework for staff, students, parents, and community agencies to respond quickly and effectively to emergency situations, and educate them on their roles and responsibilities before, during, and after an incident.
- Protect school property and environment.
- Foster an awareness of the diverse emergency situations that can occur on or near the school campus.
- Facilitate the use of the school as an emergency facility (e.g., shelter site) at the direction of lawful authority.

Amador County Local Hazard Mitigation Plan

The purpose of hazard mitigation is to reduce or eliminate long-term risk to people and property from hazards. Amador County developed a Local Hazard Mitigation Plan (LHMP) to ensure the County and its residents are prepared for future hazard events (Amador County 2020).

2022 Strategic Fire Plan Amador-El Dorado Unit

The goal of the Amador-El Dorado Unit of CAL FIRE is to reduce the loss of life, property, watershed values, and other assets at risk from wildfire through a focused prefire management program and increased initial attack success (CAL FIRE 2022).

Jackson General Plan

As stated in the Safety Element of the Jackson General Plan (1981), "it is the policy of the City of Jackson to inform the public of the need for prompt removal of trash, grass, weeds, and dry brush that could furnish fuel to a conflagration" (Jackson 1981).

5. Environmental Analysis
WILDFIRE

The City of Jackson is in the process of adopting a General Plan Update that will continue to guide future decisions within the city. Goals, policies, and actions related to fire suppression and wildlife hazards are outlined here (Jackson 2023).

- **Goal SA-4:** Maintain a safe community through adequate levels of efficient and high-quality police, fire, and emergency services.
- **Policy SA 4.1:** Provide adequate funding for fire and law enforcement services, facilities, and personnel to accommodate existing and future citizens' needs to ensure a safe and secure environment for people and property.
- **Policy SA 4.4:** Ensure that adequate water supplies are available for fire suppression throughout the City.
- **Policy SA 4.6:** Require development to construct and fund all fire suppression infrastructure and equipment needed to provide adequate fire protection services.

Ione General Plan

The Noise and Safety and Public Facilities Element of the Ione General Plan identifies the ways to maintain sufficient levels of fire protection within the Ione community (Ione 2009). Goals, policies, and actions to maintain a safe community from wildfires and reduce probability of fire damage to structures include:

- **Policy NS-2.2:** Cooperate and consult with other local, regional, state and federal agencies and with rail carriers in an effort to secure the safety of all residents of the City of Ione.
- **Goal NS-7:** Reduce the probability of fire damage to structures.
- **Policy NS-7.1:** The City shall ensure that the Ione Fire Department has sufficient resources and capabilities to reduce fire hazards, assist in fire suppression, and ensure efficient emergency medical response. (*Cross reference: PF 13.1*)
- **Policy NS-7.2:** All new development shall provide adequate improvements to meet fire flow requirements established by the City. (*Cross reference: PF 1.3, PF 1.3.1*)
- **Policy NS-7.4:** Reduce the risks associated with wildfires in and around the City.
- **Goal PS-13:** Maintain sufficient levels of fire protection and police services to protect public safety and property.
- **Policy PS-13.1:** The City shall strive to maintain a firefighting capability sufficient to maintain a proper fire response time as a general guideline for service provision and locating new fire stations. (*Cross reference: NS 7.1*)

Sutter Creek General Plan

The Safety Element of the Sutter Creek General Plan aims to protect property and the health and safety of persons living in or visiting the City of Sutter Creek (Sutter Creek 2019). Objectives, policies, and implementation measures related to wildland and urban fires include:

- **Policy S-1.4.1:** The Sutter Creek Fire District shall be asked by the City to review development plans, land division projects, and planned developments to ensure compliance with fire suppression and prevention requirements.
- **Policy S-1.4.2:** New development shall ensure there is sufficient water supply and facilities for fire suppression units in the event of a wildland fire.
- **Policy S-1.4.3:** Looped water systems shall be installed within new developments, where feasible, and new water systems shall provide for adequate pressure and volumes at each hydrant installed.
- **Policy S-1.4.4:** In new developments there shall be sufficient access for emergency vehicles and evacuation of residents. Two or more routes of access should be provided, preferably on different sides of the development.
- **Policy S-1.4.7:** Vehicular access shall be provided to within 150 feet of a structure.
- **Policy S-1.4.8:** Buildings in urban-wildland interface areas shall comply with California Department of Forestry and Fire Protection recommendations on defensible space.

5.18.1.2 EXISTING CONDITIONS

City of Jackson

The southeastern portion of the city is within a moderate FHSZ in an SRA, and the city is surrounded by moderate and high FHSZs in SRAs (CAL FIRE 2023). Argonaut HS is not in a wildfire hazard zone.

According to CAL FIRE, the WUI is subdivided into the intermix zone (where houses and wildland vegetation directly mingle), the interface zone (housing adjacent to wildland vegetation, but not mingled with it), and the influence zone (areas of wildfire-susceptible vegetation surrounding the other zones) (CAL FIRE 2019). The interface and intermix zones carry the highest risk for wildfires affecting developed areas. Unlike wildfire in wildland areas, fires in WUI areas are more likely to damage or destroy buildings and infrastructure that support populations, the economy, and key services in the City.

According to Figure 5.18-1, *Wildland Urban Interface,* Argonaut HS is in an interface zone of the WUI.

City of Ione

The northeastern portion of the city is a very high FHSZ in an LRA, and the southeastern and southwestern portions of the city are in a moderate FHSZ in the SRA (CAL FIRE 2023). Ione Junior HS is not in a wildfire hazard zone. According to Figure 5.18-1, Ione Junior HS is not within a WUI.

City of Sutter Creek

Portions of land in the northeastern, eastern, northwester, and southwestern parts of the city are in moderate and high FHSZs in the SRA (CAL FIRE 2023). Sutter Creek ES is not in a wildfire hazard zone. According to Figure 5.18-1, Sutter Creek ES is within an interface zone of the WUI.

5.18.2 Thresholds of Significance

According to Appendix G of the CEQA Guidelines, a project would normally have a significant effect on the environment if located in or near state responsibility areas or lands classified as very high fire hazard severity zones the project would:

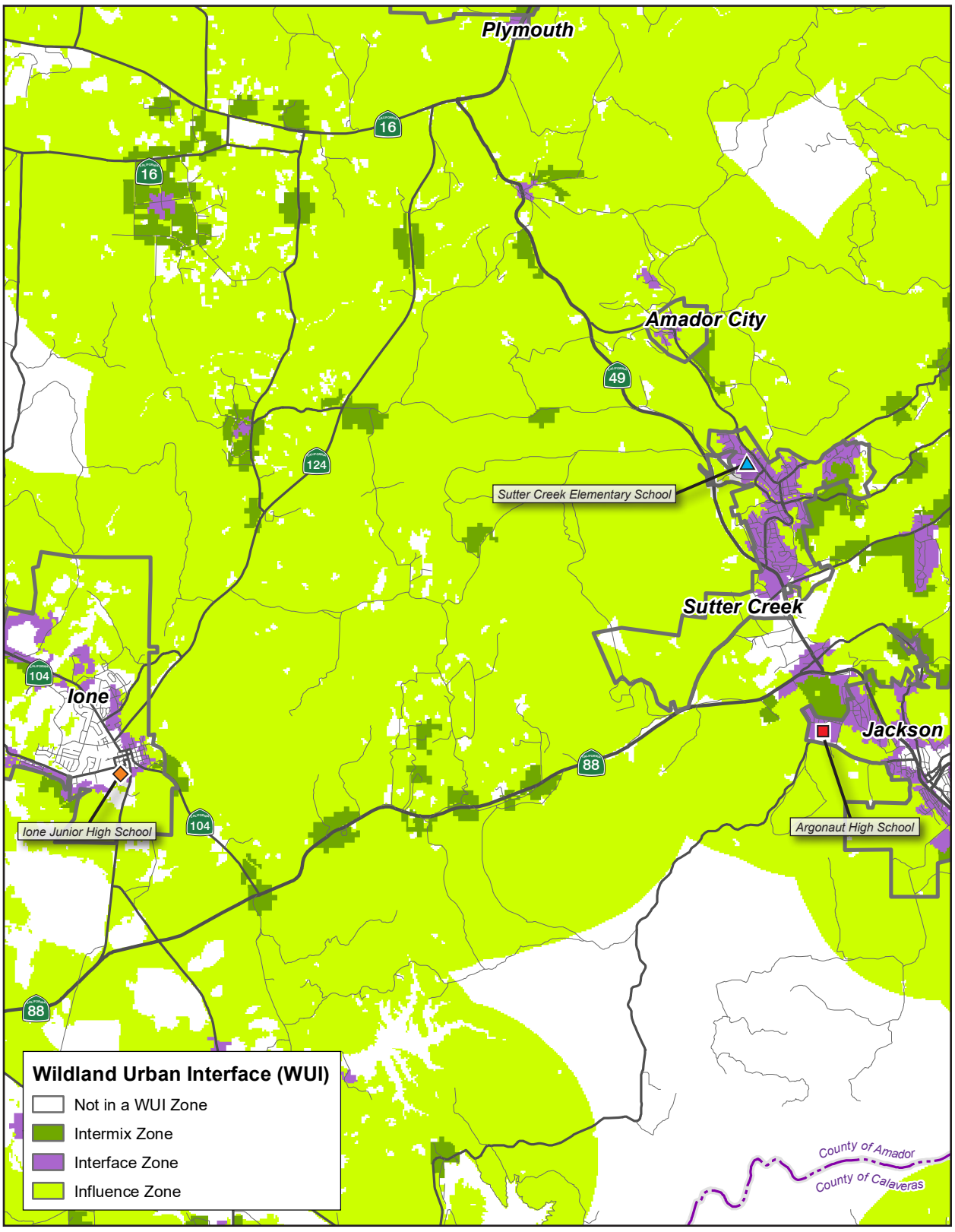
W-1 Substantially impair an adopted emergency response plan or emergency evacuation plan.

W-2 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.

W-3 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.

W-4 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.

Figure 5.18-1 - Wildland Urban Interface



Source: CalFIRE 2019.

5. Environmental Analysis
WILDFIRE

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5.18.3 Environmental Impacts

The applicable thresholds are identified in brackets after the impact statement.

Impact 5.18-1: Implementation of the proposed project would not substantially impair an adopted emergency response plan or emergency evacuation plan. [Threshold W-1]

The proposed project would increase student enrollment capacity at three campuses, including Argonaut HS, Ione Junior HS, and Sutter Creek ES. Student enrollment capacity would not change or would decrease at the other campuses.

Argonaut High School Site Improvements

The proposed project would implement building and site improvements at the campus in order to accommodate students from Amador HS, thereby increasing capacity onsite. The campus is not within a very high FHSZ. The County's LHMP describes the mitigation strategy process and mitigation action plan for the County, which includes communicating hazard information, implementing the action plan recommendations, implementing existing laws and regulations, and monitoring multi-objective management opportunities for funding (Amador County 2020). The proposed project would not conflict with the LHMP; the surrounding roadways would continue to provide emergency access to the campus and surrounding properties during construction and operational activities. The proposed project would construct a new access road connecting to Stony Creek Road, which would reduce congestion and provide additional egress and ingress in the event of an emergency. As part of the project review process, the campus site design and building plans would be reviewed and approved by the DSA. The Jackson Fire Department will review locations of fire hydrants and fire lanes. This process would ensure that the project site includes adequate emergency access and circulation. Therefore, impacts would be **less than significant**.

Ione Junior High School Site Improvements

The proposed project would implement site improvements at the campus in order to accommodate students from Ione ES. The campus is not within a very high FHSZ. The County's LHMP describes the mitigation strategy process and action plan for the County, which includes communicating hazard information, implementing the action plan recommendations, implementing existing laws and regulations, and monitoring multi-objective management opportunities for funding (Amador County 2020). The proposed project would not conflict with the LHMP; the surrounding roadways would continue to provide emergency access to the campus and surrounding properties during construction and operational activities. The proposed project would expand the parent and kindergarten drop-off/pick-up areas, which would reduce congestion on the surrounding roadways in the event of an emergency. As part of the project review process, the campus site design and building plans would be reviewed and approved by the DSA. The Ione Fire Department will review locations of fire hydrants and fire lanes. This process would ensure that the project site includes adequate emergency access and circulation. Therefore, impacts would be **less than significant**.

Sutter Creek Elementary School Site Improvements

The proposed project would implement site improvements at the campus in order to accommodate students in grades TK through six, thereby increasing the capacity at the school. The campus is not within a very high FHSZ. The County's LHMP describes the mitigation strategy process and mitigation action plan for the County, which includes communicating hazard information, implementing the action plan recommendations, implementing existing laws and regulations, and monitoring multi-objective management opportunities for funding (Amador County 2020). The proposed project would not conflict with the LHMP; the surrounding roadways would continue to provide emergency access to the campus and surrounding properties during construction and operational activities. As part of the project review process, the campus site design and building plans would be reviewed and approved by the DSA. The Sutter Creek Fire Department will review locations of fire hydrants and fire lanes. This process would ensure that the project site includes adequate emergency access and circulation. Therefore, impacts would be **less than significant**.

Level of Significance Before Mitigation: Less than Significant Impact.

Impact 5.18-2: The proposed project would not exacerbate wildfire risks due to slope, prevailing winds, and other factors, thereby exposing project occupants to elevated particulate concentrations from a wildfire. [Threshold W-2]

Argonaut High School Site Improvements

The campus is developed with the existing Argonaut HS. As discussed in Section 5.6, *Geology and Soils*, the project site has a gentle topography with slight grade changes across the campus. The City of Jackson does not have high-speed prevailing winds, and average wind speeds are approximately six miles per hour during the windiest time of year (Weather Spark 2023a). Neither the campus nor surrounding area is within a very high FHSZ. However, Argonaut HS is within an interface zone of the WUI, and therefore, future development under the proposed project would be required to comply with the requirements outlined in Chapter 49 of the California Fire Code, including requirements for fire protection plans. Adherence to the applicable requirements of the California Fire Code will be ensured through the DSA's review of building permits. Development of the site improvements at Argonaut HS would not exacerbate wildfire risks due to slope and prevailing winds that would expose project occupants to elevated particulate concentrations. A **less than significant impact** would occur.

Ione Junior High School Site Improvements

The campus is developed with the existing Ione Junior HS. As discussed in Section 5.6, *Geology and Soils*, the project site has a gentle topography with slight grade changes across the campus. The City of Ione does not have high-speed prevailing winds, and average wind speeds are approximately six miles per hour during the windiest time of year (Weather Spark 2023b). Neither the campus nor surrounding area is within a very high FHSZ. Additionally, Ione Junior HS is not within a WUI. Development of the site improvements at Jackson Junior HS would not exacerbate wildfire risks due to slope and prevailing winds that would expose project occupants to elevated particulate concentrations. A **less than significant impact** would occur.

Sutter Creek Elementary School Site Improvements

The campus is developed with the existing Sutter Creek ES. As discussed in Section 5.6, *Geology and Soils*, the project site has a gentle topography with slight grade changes across the campus. The project site at Sutter Creek ES is generally flat. The City of Sutter Creek does not have high-speed prevailing winds, and average wind speeds are approximately six miles per hour during the windiest time of year (Weather Spark 2023c). Neither the campus nor surrounding area is within a very high FHSZ. However, Sutter Creek ES is within an interface zone of the WUI, and therefore, future development under the proposed project would be required to comply with the requirements outlined in Chapter 49 of the California Fire Code, including requirements for fire protection plans. Adherence to the applicable requirements of the California Fire Code will be ensured through the DSA's review of building permits. Development of the site improvements at Sutter Creek ES would not exacerbate wildfire risks due to slope and prevailing winds that would expose project occupants to elevated particulate concentrations. A **less than significant impact** would occur.

Level of Significance Before Mitigation: Less than Significant Impact.

Impact 5.18-3: The proposed project would not require the installation and maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) and therefore would not exacerbate fire risk or result in temporary or ongoing impacts to the environment. [Threshold W-3]

Argonaut High School Site Improvements

The campus is developed with the existing Argonaut HS and is not within a very high FHSZ. The proposed project would be served by the existing utilities, including water sources and power lines, that currently serve the campus. The proposed project would not require roads, fuel breaks, emergency water sources. Therefore, the proposed project would not require installation of new infrastructure that may exacerbate fire risk. No impact would occur.

Ione Junior High School Site Improvements

The campus is developed with the existing Ione Junior HS and is not within a very high FHSZ. The proposed project would be served by the existing utilities, including water sources and power lines, that currently serve the campus. The proposed project would not require roads, fuel breaks, emergency water sources. Therefore, the proposed project would not require installation of new infrastructure that may exacerbate fire risk. No impact would occur.

Sutter Creek Elementary School Site Improvements

The campus is developed with the existing Sutter Creek ES and is not within a very high FHSZ. The proposed project would be served by the existing utilities, including water sources and power lines, that currently serve the campus. The proposed project would not require roads, fuel breaks, emergency water sources. Therefore, the proposed project would not require installation of new infrastructure that may exacerbate fire risk. No impact would occur.

Level of Significance Before Mitigation: No Impact.

Impact 5.18-4: The proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, postfire slope instability, or drainage changes. [Threshold W-4]

Argonaut High School Site Improvements

The campus is developed with the existing Argonaut HS campus and is not within a very high FHSZ. The campus has a gentle topography and is not within a landslide hazard area or floodplain (Amador County 2016). Construction activities related to the proposed project would be subject to compliance with the California Building Code (CBC) and CFC and would include best management practices, which may include, but are not limited to, covering the soil, use of dust-inhibiting material, landscaping, and grading in a pattern that slows stormwater flow and reduces the potential for erosion, landslides, and downstream flooding. Therefore, the proposed project would not 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. A **less than significant impact** would occur.

Ione Junior High School Site Improvements

The campus is developed with the existing Ione Junior HS campus and is not within a very high FHSZ. The campus has a gentle topography and is not within a landslide hazard area or floodplain (Amador County 2016). Construction activities related to the proposed project would be subject to compliance with the CBC and CFC and would include best management practices, which may include, but are not limited to, covering the soil, use of dust-inhibiting material, landscaping, and grading in a pattern that slows stormwater flow and reduces the potential for erosion, landslides, and downstream flooding. Therefore, the proposed project would not 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. A **less than significant impact** would occur.

Sutter Creek Elementary School Site Improvements

The campus is developed with the existing Sutter Creek ES campus and is not within a very high FHSZ. The campus has a gentle topography and is not within a landslide hazard area or floodplain (Amador County 2016). Construction activities related to the proposed project would be subject to compliance with the CBC and CFC and would include best management practices, which may include, but are not limited to, covering the soil, use of dust-inhibiting material, landscaping, and grading in a pattern that slows stormwater flow and reduces the potential for erosion, landslides, and downstream flooding. Therefore, the proposed project would not 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. A **less than significant impact** would occur.

Level of Significance Before Mitigation: Less than Significant Impact.

5.18.4 Mitigation Measures

No mitigation measures are required.

5.18.5 Level of Significance After Mitigation

Impacts would be less than significant prior to mitigation, and no mitigation is required.

5.18.6 Cumulative Impacts

None of the campuses are in or near a very high FHSZ. Ione Junior HS is not within a WUI; Argonaut HS and Sutter Creek ES are within an interface zone of the WUI. Future development, such as the Wicklow Way Specific Plan to the west of Argonaut HS, would develop currently undeveloped land and thereby reducing the risk of wildfires. The proposed project, as well as all other projects in the county, would be required to comply with the CBC, CFC, and implement applicable best management practices during construction and operation. For projects within a WUI, compliance the requirements outlined in Chapter 49 of the CDC would reduce impacts associated with the WUI. As part of the project review process for projects in the county, building plans would be reviewed by the applicable fire department to ensure adequate emergency access. Because the proposed project is a school project, the DSA would review the building and site plans. Therefore, the proposed project would not contribute to a cumulative impact; cumulative impacts would be less than significant.

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6. Significant Unavoidable Adverse Impacts

At the end of Chapter 1, *Executive Summary*, is a table that summarizes the impacts, mitigation measures, and levels of significance before and after mitigation. Mitigation measures would reduce the level of impact, but the following impacts would remain significant, unavoidable, and adverse after all feasible mitigation measures are applied:

Noise

- **Cumulative Traffic Noise**

  Implementation of the proposed project would change traffic patterns associated with the operation of ACUSD which in turn affects traffic noise patterns. As shown in Table 5.11-18 in Section 5.11, *Noise*, the proposed project on its own would not exceed any of the noise thresholds. However, the proposed project would contribute to a cumulative operational traffic noise impact that would exceed thresholds. The District would continue to implement its busing program with the implementation of the proposed project. The proposed project would implement Mitigation Measure T-1, which would include the preparation of a transportation demand management plan that would encourage alternatives to single-occupancy vehicles. However, there are no feasible mitigation measures that would reduce cumulative operational traffic noise, and impact would remain significant and unavoidable.

Transportation

- **Impact 5.15-2: The proposed project would conflict or be inconsistent with CEQA Guidelines § 15064.3, subdivision (b).**

  The proposed project would consolidate eight campuses into six would result in VMT per student increasing from 10.8 miles to 11.4 miles representing a 5.2 percent increase. Implementation of Mitigation Measure T-1 would require the preparation of transportation demand management plan, which would reduce VMT to the extent feasible. The District currently has a busing program, and the District would continue to provide busing program with the implementation of the proposed project. Nevertheless, the proposed project would increase VMT compared to existing conditions. Therefore, Impact 5.15-2 would remain significant and unavoidable.

- **Cumulative Vehicle Miles Traveled**

  The proposed project would increase VMT per student compared to existing conditions. As discussed above, the proposed would incorporate Mitigation Measure T-1 to reduce VMT to the extent feasible. The proposed project result in a cumulatively considerable impact to VMT in the area.

6. Significant Unavoidable Adverse Impacts

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7. Alternatives to the Proposed Project

7.1 INTRODUCTION

7.1.1 Purpose and Scope

The California Environmental Quality Act (CEQA) requires that an environmental impact report (EIR) include a discussion of reasonable project alternatives that would "feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any significant effects of the project, and evaluate the comparative merits of the alternatives" (CEQA Guidelines § 15126.6[a]). As required by CEQA, this chapter identifies and evaluates potential alternatives to the proposed project.

Section 15126.6 of the CEQA Guidelines explains the foundation and legal requirements for the alternatives analysis in an EIR. Key provisions are:

- "[T]he discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly." (15126.6[b])

- "The specific alternative of 'no project' shall also be evaluated along with its impact." (15126.6[e][1])

- "The no project analysis shall discuss the existing conditions at the time the notice of preparation is published, or if no notice of preparation is published, at the time environmental analysis is commenced, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services. If the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives." (15126.6[e][2])

- "The range of alternatives required in an EIR is governed by a 'rule of reason' that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project." (15126.6[f])

- "Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries…, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent)" (15126.6[f][1]).

- "Only locations that would avoid or substantially lessen any of the significant effects of the project need be considered for inclusion in the EIR." (15126.6[f][2][A])

- "An EIR need not consider an alternative whose effect cannot be reasonably ascertained and whose implementation is remote and speculative." (15126.6[f][3])

For each development alternative, this analysis:

- Describes the alterative.
- Analyzes the impact of the alternative as compared to the proposed project.
- Identifies the impacts of the project that would be avoided or lessened by the alternative.
- Assesses whether the alternative would meet most of the basic project objectives.
- Evaluates the comparative merits of the alternative and the project.

According to Section 15126.6(d) of the CEQA Guidelines, "[i]f an alternative would cause…significant effects in addition those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed."

7.1.2 Project Objectives

As described in Section 3.2, the following objectives have been established for the proposed project and will aid decision makers in their review of the project, the project alternatives, and associated environmental impacts.

- Enhance educational opportunities, counseling, and other support services by focusing resources on fewer facilities.
- Maintain District financial stability by consolidating resources for efficient program administration.
- Address enrollment fluctuations by consolidating schools and closing two schools.

7.2 ALTERNATIVES CONSIDERED AND REJECTED

The following is a discussion of the land use alternatives considered during the scoping and planning process and the reasons why they were not selected for detailed analysis in this EIR.

7.2.1 Maintaining Ione Elementary School Open

The District explored maintaining the existing Ione Elementary School open; however, this would result in inefficient staffing ratios at other schools within the District. Additionally, aging facilities on the existing Ione ES campus would require additional necessary improvements. Over 50 percent of critical needs costs are concentrated at Ione Elementary and Jackson Jr. High. This option was ultimately rejected because it would be infeasible and would result in greater construction impacts on an additional District campus. For these reasons, this alternative was not considered further.

7.3 ALTERNATIVES SELECTED FOR FURTHER ANALYSIS

Based on the criteria listed above, the following three alternatives have been determined to represent a reasonable range of alternatives which have the potential to feasibly attain most of the basic objectives of the project but which may avoid or substantially lessen any of the significant effects of the project. These alternatives are analyzed in detail in the following sections.

- Alternative 1: No Project Alternative
- Alternative 2: School Consolidation at Ione Junior High School, Amador High School, and Argonaut High School
- Alternative 3: School Consolidation at Amador High School and Argonaut High School

An EIR must identify an "environmentally superior" alternative and where the No Project Alternative is identified as environmentally superior, the EIR is then required to identify as environmentally superior an alternative from among the others evaluated. Each alternative's environmental impacts are compared to the proposed project and determined to be environmentally superior, neutral, or inferior. Section 7.7 identifies the Environmentally Superior Alternative. The preferred land use alternative (proposed project) is analyzed in detail in Chapter 5 of this DEIR.

7.3.1 Alternatives Comparison

Table 7-1, *Alternatives Buildout Summary,* provides a summary of the student population and buildout projections determined by the four alternatives, including the proposed project. The following statistics were developed as a tool to understand better the difference between the alternatives analyzed in the DEIR.

7. Alternatives to the Proposed Project

Table 7-1 Alternatives Buildout Summary

	Proposed Project	Alternative 1	Net Change from Proposed Project	Alternative 2	Net Change from Proposed Project	Alternative 3	Net Change from Proposed Project
Argonaut High School							
Enrollment	1,263	536	-727	1,263	0	928	-335
Capacity	1,325	925	-400	1,325	0	975	-350
Teaching Stations	53	37	-16	53	0	39	-14
Grades	9-12	9-12	-	9-12	-	10-12	-
Ione Junior High School							
Enrollment	649	393	-256	767	118	649	0
Capacity	801	775	-26	801	0	801	0
Teaching Stations	33	31	-2	33	0	33	0
Grades	TK-6	6-8	-	TK-8	-	TK-6	-
Sutter Creek Elementary School							
Enrollment	388	204	-184	204	-184	204	-184
Capacity	625	325	-300	325	-300	325	-300
Teaching Stations	25	13	-12	13	-12	13	-12
Grades	TK-6	3-6	-	3-6	-	3-6	-
Amador High School							
Enrollment	603	702	99	485	-118	938	335
Capacity	875	875	0	875	0	975	100
Teaching Stations	35	35	0	35	0	39	4
Grades	7-8	9-12	-	7-8	-	7-9	-

7.4 NO PROJECT ALTERNATIVE

The CEQA Guidelines require analysis of a No Project Alternative. The purpose of this Alternative is to describe and analyze a scenario under which the proposed project is not implemented so that decision makers can compare the impacts of approving the proposed project with the impacts of not approving the proposed project. The No Project Alternative analysis must discuss the existing site conditions as well as what would reasonably be expected to occur in the foreseeable future based on any current plans, and it must be consistent with available infrastructure and community services.

Under the No Project Alternative, the proposed consolidation and closure of schools, as well as site improvements would not occur; all schools would remain as-is. More specifically, Amador and Argonaut High Schools would not be combined at Argonaut High School, Ione Elementary School would not move to Ione Junior High School to accommodate preschool and TK through sixth grade students, and Sutter Creek Elementary School would not expand to create a TK through sixth grade campus.

7.4.1 Aesthetics

Argonaut High School

Under this Alternative, the existing facilities at Argonaut High School would remain as-is. As no physical or operational changes would occur at the site, this impact would result in no new impacts to visual/aesthetic resources. As site improvements that would visually improve the site, such as landscaping, new buildings, and new paving, would not occur under this Alternative, impacts would be greater than the proposed project. Aesthetic impacts under this Alternative would be less than significant.

Ione Junior High School

Under this Alternative, the existing facilities at Ione Junior High School would remain as-is. As no physical or operational changes would occur at the site, this impact would result in no new impacts to visual/aesthetic resources. As site improvements that would visually improve the site, new buildings, and new paving, would not occur under this Alternative, impacts would be greater than the proposed project. Aesthetic impacts under this Alternative would be less than significant.

Sutter Creek Elementary School

Under this Alternative, the existing facilities at Sutter Creek Elementary School would remain as-is. As no physical or operational changes would occur at the site, this impact would result in no new impacts to visual/aesthetic resources. As site improvements that would visually improve the site, new buildings, and new paving, would not occur under this Alternative, impacts would be greater than the proposed project. Aesthetic impacts under this Alternative would be less than significant.

7.4.2 Air Quality

Argonaut High School

Under this Alternative, no construction would occur, and no new emissions would be generated. As such, this Alternative would result in less impacts to air quality than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

Ione Junior High School

Under this Alternative, no construction would occur, and no new emissions would be generated. As such, this Alternative would result in less impacts to air quality than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

Sutter Creek Elementary School

Under this Alternative, no construction would occur, and no new emissions would be generated. As such, this Alternative would result in less impacts to air quality than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

School Closure/Consolidation Program

Alternative 1 would not decrease VMT per student compared to the proposed project. Therefore, operational air quality impacts under the *School Closure/Consolidation Program* would be greater under Alternative 1, compared to the proposed project.

7.4.3 Biological Impacts

Argonaut High School

Under this Alternative, no construction would occur, and therefore, no impacts to biological resources would occur. As such, this Alternative would result in less impacts to biological resources than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

Ione Junior High School

Under this Alternative, no construction would occur, and therefore, no impacts to biological resources would occur. As such, this Alternative would result in less impacts to biological resources than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

Sutter Creek Elementary School

Under this Alternative, no construction would occur, and therefore, no impacts to biological resources would occur. As such, this Alternative would result in less impacts to biological resources than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

7.4.4 Cultural Resources

Argonaut High School

Under this Alternative, no construction would occur, and therefore, no impacts to cultural resources would occur. As such, this Alternative would result in less impacts to cultural resources than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

Ione Junior High School

Under this Alternative, no construction would occur, and therefore, no impacts to cultural resources would occur. As such, this Alternative would result in less impacts to cultural resources than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

Sutter Creek Elementary School

Under this Alternative, no construction would occur, and therefore, no impacts to cultural resources would occur. As such, this Alternative would result in less impacts to cultural resources than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

7.4.5 Energy

Argonaut High School

Under this Alternative, no construction would occur, and there would be no physical or operational changes at the site. Amador and Argonaut High Schools would not be combined, and therefore, energy usage would not be consolidated under this Alternative. Additionally, buildings onsite would be less energy efficient than the proposed buildings under the proposed project as implementation of the latest building and energy codes would not occur. Overall, this Alternative would result in greater impacts to energy than the proposed project; impacts would be less than significant.

Ione Junior High School

Under this Alternative, no construction would occur, and there would be no physical or operational changes at the site. Ione Elementary School and Ione Junior High School would not be combined, and therefore, energy usage would not be consolidated under this Alternative. Additionally, buildings onsite would be less energy efficient than the proposed buildings under the proposed project as implementation of the latest building and energy codes would not occur. Overall, this Alternative would result in greater impacts to energy than the proposed project; impacts would be less than significant.

Sutter Creek Elementary School

Under this Alternative, no construction would occur, and there would be no physical or operational changes at the site. Buildings onsite would be less energy efficient than the proposed buildings under the proposed project as implementation of the latest building and energy codes would not occur. Overall, this Alternative would result in greater impacts to energy than the proposed project; impacts would be less than significant.

7.4.6 Geology and Soils

Argonaut High School

Under this Alternative, no ground-disturbing or construction activities would occur. Therefore, no changes to the geologic conditions of the site, nor potential to discover paleontological resources would occur. Therefore, impacts under this Alternative would be less than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

Ione Junior High School

Under this Alternative, no ground-disturbing or construction activities would occur. Therefore, no changes to the geologic conditions of the site, nor potential to discover paleontological resources would occur. Therefore, impacts under this Alternative would be less than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

Sutter Creek Elementary School

Under this Alternative, no ground-disturbing or construction activities would occur. Therefore, no changes to the geologic conditions of the site, nor potential to discover paleontological resources would occur. Therefore, impacts under this Alternative would be less than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

7.4.7 Greenhouse Gas Emissions

Argonaut High School

Under this Alternative, no construction would occur, and no new emissions that could contribute to climate change would be generated. Additionally, no increases to VMT would occur under this Alternative as no schools would be closed/consolidated. As such, this Alternative would result in less greenhouse gas emissions impacts than the proposed project. No impacts would occur under this Alternative.

Ione Junior High School

Under this Alternative, no construction would occur, and no new emissions that could contribute to climate change would be generated. Additionally, no increases to VMT would occur under this Alternative as no schools would be closed/consolidated. As such, this Alternative would result in less greenhouse gas emissions impacts than the proposed project. No impacts would occur under this Alternative.

Sutter Creek Elementary School

Under this Alternative, no construction would occur, and no new emissions that could contribute to climate change would be generated. Additionally, no increases to VMT would occur under this Alternative as no schools would be closed/consolidated. As such, this Alternative would result in less greenhouse gas emissions impacts than the proposed project. No impacts would occur under this Alternative.

School Closure/Consolidation Program

Alternative 1 would not decrease VMT per student compared to the proposed project. Therefore, operational GHG emission impacts under the *School Closure/Consolidation Program* would be greater under Alternative 1, compared to the proposed project.

7.4.8 Hazards and Hazardous Materials

Argonaut High School

Under this Alternative, no construction activities would occur, and therefore, hazards to the public or environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials during construction activities would not occur. Therefore, impacts as a result of hazards and hazardous materials would be less than the proposed project, and no impacts would occur.

Ione Junior High School

Under this Alternative, no construction activities would occur, and therefore, hazards to the public or environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials during construction activities would not occur. Therefore, impacts as a result of hazards and hazardous materials would be less than the proposed project, and no impacts would occur.

Sutter Creek Elementary School

Under this Alternative, no construction activities would occur, and therefore, hazards to the public or environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials during construction activities would not occur. Therefore, impacts as a result of hazards and hazardous materials would be less than the proposed project, and no impacts would occur.

7.4.9 Hydrology and Water Quality

Argonaut High School

Under this Alternative, there would be no changes to drainage patterns, permeable surfaces, or flood flows, and no construction activities, erosion, or release of pollutants that could potentially impact water quality, deplete groundwater supplies, or increase runoff. Therefore, impacts under this Alternative would be less than the proposed project, and would not be significant.

Ione Junior High School

Under this Alternative, there would be no changes to drainage patterns, permeable surfaces, or flood flows, and no construction activities, erosion, or release of pollutants that could potentially impact water quality, deplete groundwater supplies, or increase runoff. Therefore, impacts under this Alternative would be less than the proposed project, and would not be significant.

Sutter Creek Elementary School

Under this Alternative, there would be no changes to drainage patterns, permeable surfaces, or flood flows, and no construction activities, erosion, or release of pollutants that could potentially impact water quality, deplete groundwater supplies, or increase runoff. Therefore, impacts under this Alternative would be less than the proposed project, and would not be significant.

7.4.10 Land Use and Planning

Argonaut High School

Neither this Alternative nor the proposed project would physically divide an established community or conflict with any land use plan, policy, or regulation. Therefore, land use and planning impacts under this Alternative would be similar to the proposed project and less than significant.

Ione Junior High School

Neither this Alternative nor the proposed project would physically divide an established community or conflict with any land use plan, policy, or regulation. Therefore, land use and planning impacts under this Alternative would be similar to the proposed project and less than significant.

Sutter Creek Elementary School

Neither this Alternative nor the proposed project would physically divide an established community or conflict with any land use plan, policy, or regulation. Therefore, land use and planning impacts under this Alternative would be similar to the proposed project and less than significant.

7.4.11 Noise

Argonaut High School

Under this Alternative, construction-related noise would be eliminated and no new operational noise, including traffic noise, would occur under this Alternative. Therefore, compared to the proposed project, this Alternative would result in less noise impacts and would remain less than significant.

Ione Junior High School

Under this Alternative, construction-related noise would be eliminated and no new operational noise, including traffic noise, would occur under this Alternative. Therefore, compared to the proposed project, this Alternative would result in less noise impacts and would remain less than significant.

Sutter Creek Elementary School

Under this Alternative, construction-related noise would be eliminated and no new operational noise, including traffic noise, would occur under this Alternative. Therefore, compared to the proposed project, this Alternative would result in less noise impacts and would remain less than significant.

School Closure/Consolidation Program

Alternative 1 would not decrease transportation impacts compared to the proposed project. Therefore, operational noise impacts under the *School Closure/Consolidation Program* would be greater under Alternative 1, compared to the proposed project.

7.4.12 Population and Housing

Argonaut High School

Neither this Alternative nor the proposed project would directly or indirectly induce population growth. However, this Alternative would not create new temporary construction jobs. Like the proposed project, this Alternative would not displace housing or people. Impacts are considered greater under this Alternative as temporary employment opportunities would not be created, however, as with the proposed project, impacts would be less than significant.

Ione Junior High School

Neither this Alternative nor the proposed project would directly or indirectly induce population growth. However, this Alternative would not create new temporary construction jobs. Like the proposed project, this Alternative would not displace housing or people. Impacts are considered greater under this Alternative as temporary employment opportunities would not be created, however, as with the proposed project, impacts would be less than significant.

Sutter Creek Elementary School

Neither this Alternative nor the proposed project would directly or indirectly induce population growth. However, this Alternative would not create new temporary construction jobs. Like the proposed project, this Alternative would not displace housing or people. Impacts are considered greater under this Alternative as temporary employment opportunities would not be created, however, as with the proposed project, impacts would be less than significant.

7.4.13 Public Services

Argonaut High School

This Alternative would not result in an increase in demand for fire, police, school, and library services in the City. While impacts to public services under the proposed project were determined to be less than significant, this Alternative would eliminate these impacts. Therefore, no impacts to public services would occur under this Alternative.

Ione Junior High School

This Alternative would not result in an increase in demand for fire, police, school, and library services in the City. While impacts to public services under the proposed project were determined to be less than significant, this Alternative would eliminate these impacts. Therefore, no impacts to public services would occur under this Alternative.

Sutter Creek Elementary School

This Alternative would not result in an increase in demand for fire, police, school, and library services in the City. While impacts to public services under the proposed project were determined to be less than significant, this Alternative would eliminate these impacts. Therefore, no impacts to public services would occur under this Alternative.

7.4.14 Recreation

Argonaut High School

Neither this Alternative nor the proposed project would result in direct or indirect population growth. As such, students are expected to use parks and recreational facilities near their existing residences. While this Alternative would eliminate the potential for students to use parks and recreational facilities surrounding the project site, such impacts under the proposed project would be nominal. As such, impacts to recreational facilities under this Alternative would be similar to the proposed project and less than significant.

Ione Junior High School

Neither this Alternative nor the proposed project would result in direct or indirect population growth. As such, students are expected to use parks and recreational facilities near their existing residences. While this Alternative would eliminate the potential for students to use parks and recreational facilities surrounding the project site, such impacts under the proposed project would be nominal. As such, impacts to recreational facilities under this Alternative would be similar to the proposed project and less than significant.

Sutter Creek Elementary School

Neither this Alternative nor the proposed project would result in direct or indirect population growth. As such, students are expected to use parks and recreational facilities near their existing residences. While this Alternative would eliminate the potential for students to use parks and recreational facilities surrounding the project site,

such impacts under the proposed project would be nominal. As such, impacts to recreational facilities under this Alternative would be similar to the proposed project and less than significant.

7.4.15 Transportation

Argonaut High School

Under this Alternative, Amador and Argonaut High Schools would not be combined and therefore, no increases to VMT would occur. Therefore, this Alternative would result in less impacts to transportation than the proposed project and impacts would be less than significant.

Ione Junior High School

Under this Alternative, Amador and Argonaut High Schools would not be combined and therefore, no increases to VMT would occur. Therefore, this Alternative would result in less impacts to transportation than the proposed project and impacts would be less than significant.

Sutter Creek Elementary School

Under this Alternative, Amador and Argonaut High Schools would not be combined and therefore, no increases to VMT would occur. Therefore, this Alternative would result in less impacts to transportation than the proposed project and impacts would be less than significant.

School Closure/Consolidation Program

Alternative 1 would not decrease transportation impacts compared to the proposed project. Therefore, operational transportation impacts under the *School Closure/Consolidation Program* would be greater under Alternative 1, compared to the proposed project.

7.4.16 Tribal Cultural Resources

Argonaut High School

Under this Alternative, no construction would occur, and therefore, no impacts to tribal cultural resources would occur. As such, this Alternative would result in less impacts to tribal cultural resources than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

Ione Junior High School

Under this Alternative, no construction would occur, and therefore, no impacts to tribal cultural resources would occur. As such, this Alternative would result in less impacts to tribal cultural resources than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

Sutter Creek Elementary School

Under this Alternative, no construction would occur, and therefore, no impacts to tribal cultural resources would occur. As such, this Alternative would result in less impacts to tribal cultural resources than the proposed project, and would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

7.4.17 Utilities and Service Systems

Argonaut High School

Under this Alternative, no new development would occur. Therefore, there would be no increases in water demand, wastewater generation, storm drainage runoff, or solid waste disposal. Overall, this Alternative would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

Ione Junior High School

Under this Alternative, no new development would occur. Therefore, there would be no increases in water demand, wastewater generation, storm drainage runoff, or solid waste disposal. Overall, this Alternative would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

Sutter Creek Elementary School

Under this Alternative, no new development would occur. Therefore, there would be no increases in water demand, wastewater generation, storm drainage runoff, or solid waste disposal. Overall, this Alternative would eliminate the proposed project's potentially significant impacts. No mitigation measures would be required under this Alternative as no impacts would occur.

School Closure/Consolidation Program

Additionally, operational impacts to utilities and service systems under the *School Closure/Consolidation Program* would be greater under Alternative 1, compared to the proposed project.

7.4.18 Wildfire

Argonaut High School

Under this Alternative, site improvements, such as constructing a new access road connecting to Stony Creek Road, would not occur. Therefore, this Alternative would not result in improvements needed to reduce congestion and ensure additional egress/ingress in the event of an emergency. Additionally, as no new buildings would be constructed under this Alternative, compliance with the building and fire codes would not occur. Wildfire impacts under this Alternative would be greater than the proposed project, however, as with the proposed project, impacts would be less than significant.

Ione Junior High School

Under this Alternative, site improvements, such as expanding the parent and kindergarten drop-off/pick-up areas, would not occur. Therefore, this Alternative would not result in improvements needed to reduce congestion in the event of an emergency. Additionally, as no new buildings would be constructed under this Alternative, compliance with the building and fire codes would not occur. Wildfire impacts under this Alternative would be greater than the proposed project, however, as with the proposed project, impacts would be less than significant.

Sutter Creek Elementary School

As no new buildings would be constructed under this Alternative, compliance with the building and fire codes would not occur. Wildfire impacts under this Alternative would be greater than the proposed project, however, as with the proposed project, impacts would be less than significant.

7.4.19 Conclusion

The No Project Alternative would lessen impacts to air quality, biological resources, cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, noise, public services, transportation, tribal cultural resources, and utilities and service systems. This Alternative would increase impacts to aesthetics, energy, population and housing, and wildfire. This Alternative would result in similar impacts to land use and planning and recreation.

This Alternative would result in no changes to existing conditions, and there would be no closure, consolidation, or improvements made to the schools within the District's jurisdiction. Therefore, this Alternative would not meet any of the project objectives.

7.5 ALTERNATIVE 2. SCHOOL CONSOLIDATION AT IONE JUNIOR HIGH SCHOOL, AMADOR HIGH SCHOOL, AND ARGONAUT HIGH SCHOOL

Under Alternative 2, the District would consolidate students onto three ACUSD campuses which would include Ione Junior High School, Amador High School, and Argonaut High School. Under this Alternative, students from preschool through 8th grade would attend school at the Ione Junior High School campus. This would relocate students from Ione Elementary School to the Ione Junior High School campus, creating a comprehensive campus, and allowing students to stay until 8th grade. The enrollment capacity at Ione Junior HS would remain the same as the proposed project; however, the anticipated student population at the Ione Junior High School campus under this Alternative would be approximately 767 students, an increase of approximately 118 students compared to the proposed project. However, the campus would not require the construction beyond what was identified for the proposed project.

Under Alternative 2, Amador High School would serve additional county students in grades 7 and 8. Similar to the proposed project, this change would not affect the capacity of 875 students on the campus. The anticipated student population at Amador HS under this Alternative would decrease to approximately 485 students; thus,

this Alternative would not affect the number of teaching stations. No building or site improvements would be proposed at the campus.

Argonaut High School would serve all county students in grades 9 through 12 under Alternative 2. Similar to the proposed project, this would change the enrollment capacity on the campus from 925 students to 1,325 students and increase the number of teaching stations from 37 to 53. This campus would require site improvements to accommodate the increase in enrollment.

Under Alternative 2, Sutter Creek Elementary School would be the same as existing conditions. It would serve students in grade 3 through 6. The student enrollment capacity would decrease by 300 students and enrollment at Sutter Creek Elementary would decrease by approximately 184 students, compared to the proposed project, for a total population of 204 students. This Alternative would not affect the number of teaching stations compared to existing conditions, and no building or site improvements would be proposed at the campus. Sutter Creek Primary would remain open.

Improvements to all other District campuses, would remain the same as the proposed project.

7.5.1 Aesthetics

Ione Junior High School

Improvements to at Ione Junior HS would be made on the existing school campus and would be consistent with the visual appearance of the campus currently, similar to the proposed project. Development of the site improvements would not substantially alter views of the campus nor of the surrounding visual character. Under Alternative 2, the campus would not require additional construction of any new teaching stations on the campus to accommodate the new student population, compared to the proposed project. Similar to the proposed project, all new proposed building would be similar in height and design as the existing buildings onsite. Although Alternative 2 would introduce new light and glare sources to the area, the new light and glare sources would be similar to existing conditions and to neighboring uses. Considering the existing sources of light and glare in the surrounding area and currently onsite, the potential light and glare from site improvements would not be substantially greater or different from existing lighting in the surrounding area. Therefore, aesthetic impacts at Ione Junior Hight School under Alternative 2 would be less than significant.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus, and the number of teaching stations on the campus would remain the same as the proposed project. Therefore, no additional aesthetic impacts would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Under Alternative 2, the proposed improvements would be made on the existing school campus and would maintain the design features and visual appearance of the campus and surrounding areas, similar to the proposed project. The addition of a new 2-story building would be similar in height and design to the multi-

purpose room and other two-story buildings already on campus and similar in height to the two-story residences in the surrounding neighborhood. The proposed building would be located towards the middle of campus and would be surrounded by existing campus buildings. Thus, the proposed building would be similar in height and design as the existing buildings onsite. Other proposed improvements would be within the existing campus and would mostly involve new asphalt pavement and minimal grading which would not affect views. Additionally, building design, materials, and landscaping would be consistent with the existing school buildings and campus.

The combination of building materials along with its location on the campus, the proposed building would not generate a new substantial source of light or glare that could affect surrounding properties. Although the proposed project would introduce new light and glare sources to the area, the new light and glare sources would be similar to existing conditions and to neighboring uses. Therefore, aesthetic impacts at Argonaut Hight School under Alternative 2 would be less than significant.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus. Therefore, no additional aesthetic impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

7.5.2 Air Quality

Ione Junior High School

Under Alternative 2, the construction of new classroom buildings would require activities which inherently generate fugitive dust emissions (e.g., demolition, site preparation, grading). Since Alternative 2 would result in a slight increase in the student population on the Ione Junior HS campus compared to the proposed project, construction impacts are anticipated to be similar to the proposed project. Construction improvements at Ione Junior HS would require the implementation of Mitigation Measures AQ-1 and AQ-2 to reduce potentially significant impacts related to construction fugitive dust and criteria pollutants to a less-than-significant level. Although student enrollment and staffing on the Ione Junior HS campus would increase, similar to the proposed project; operational air quality impacts would remain less than significant.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional air quality impacts would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Under Alternative 2, construction of the new two-story classroom building, relocation of five portable classrooms, conversion of school buildings, and renovation of the gymnasium locker rooms would require activities which inherently generate fugitive dust emissions (e.g., demolition, site preparation, grading), similar

to the proposed project. Thus, construction improvements at Argonaut HS would require the implementation of Mitigation Measures AQ-1 and AQ-2 to reduce potentially significant impacts related to construction fugitive dust and criteria pollutants to a less-than-significant level.

This alternative would have the same enrollment capacity and staffing as the proposed project, and operational air quality impacts would remain less than significant, as with the proposed project. Air quality impacts during operation of this alternative would remain the same compared to the proposed project. Therefore, Alternative 2 would not increase the impacts to air quality during construction or operation, compared to the proposed project.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus. This alternative would continue operating similar to existing conditions. Therefore, no additional air quality impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

School Closure/Consolidation Program

Alternative 2 would decrease VMT per student by approximately 2.6 percent compared to the proposed project. Therefore, operational air quality impacts under the *School Closure/Consolidation Program* would be reduced under Alternative 2, compared to the proposed project.

7.5.3 Biological Resources

Ione Junior High School

Construction of Alternative 2 at Ione Junor HS would be limited to the BSA on the campus. Similar to the proposed project, there are seven special status animals that have the potential to occur within the Ione Junior HS BSA—Nuttall's woodpecker, yellow-billed magpie, oak titmouse, Lawrence's goldfinch, Bullock's oriole, pallid bat, and Townsend's big-eared bat. Therefore, similar to the proposed project, Alternative 2 would require the implementation of Mitigation Measure BIO-1 though BIO-3, which would ensure adherence to regulatory compliance measures, and reduce potential impacts to any special status animals to a less-than-significant level.

Alternative 2 would not result in any additional impacts riparian habitats, wetlands, or any native wildlife nursery sites, compared to the proposed project.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional impacts to biological resource would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Construction of Alternative 2 at Argonaut HS would be limited to the BSA on the campus. Similar to the proposed project, there are seven special status animals that have the potential to occur within the Argonaut BSA—Nuttall's woodpecker, yellow-billed magpie, oak titmouse, Lawrence's goldfinch, Bullock's oriole, pallid bat, and Townsend's big-eared bat. Therefore, similar to the proposed project, Alternative 2 would require the implementation of Mitigation Measure BIO-1 through BIO-3, which would ensure adherence to regulatory compliance measures, and reduce potential impacts to any special status animals to a less-than-significant level.

Alternative 2 would not result in any additional impacts riparian habitats, wetlands, or any native wildlife nursery sites, compared to the proposed project.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6. Alternative 2 would not result in an increase in capacity, compared to the proposed project and would continue operating similar to existing conditions. No building or site improvements would be proposed at the campus. Therefore, no additional impacts to biological resources would occur at Sutter Creek ES under Alternative 2.

7.5.4 Cultural Resources

Ione Junior High School

The Archaeological Resources and Architectural History Inventory and Evaluation Report evaluated the resource using the NRHP and CRHR eligibility criteria and found that Ione Junior HS is not eligible for the NRHP nor CRHR listing. Therefore, similar to the proposed project, Alternative 2 would not cause a change in significance of a historical resource at Ione Junior HS. Although no known archaeological resources have been recorded at the project site, ground-disturbing construction activities (e.g., site preparation, grading, excavation, and trenching for utilities) associated with Alternative 2 may result in unanticipated discoveries of archaeological resources or human remains. Therefore, as with the proposed project, construction activities during Alternative 2 would require the implementation of Mitigation Measure TCR-1, to reduce potentially significant impacts related to the accidental discovery of archaeological resources and human remains to a less-than-significant level.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional impacts to cultural resources would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

The Argonaut HS built environment does not exceed 50 years of age. Therefore, none of the buildings on the Argonaut HS campus meet the eligibility criteria for listing in the NRHP or CRHR. Although no known

archaeological resources have been recorded at the project site, ground-disturbing construction activities (e.g., site preparation, grading, excavation, and trenching for utilities) associated with Alternative 2 may result in unanticipated discoveries of archaeological resources or human remain. Therefore, as with the proposed project, construction activities during Alternative 2 would require the implementation of Mitigation Measure TCR-1, to reduce potentially significant impacts related to the accidental discovery of archaeological resources and human remains to a less-than-significant level.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6. Alternative 2 would not result in an increase in capacity, compared to the proposed project and would continue operating similar to existing conditions. No building or site improvements would be proposed at the campus. Therefore, no additional impacts to cultural resources would occur at Sutter Creek ES under Alternative 2.

7.5.5 Energy

Ione Junior High School

Under Alternative 2, site improvements at Ione Junior HS would require electricity consumption during construction activities. However, electricity demand would be temporary and would cease operating upon completion of the site improvements at the campus. Similar to the proposed project, construction of Alternative 2 would not require the use of natural gas. Construction trips would not result in unnecessary use of energy since Ione Junior HS is served by regional roadways (e.g., State Route 124 and State Route 104). Thus, the construction energy use related to site improvements at Ione Junior HS under Alternative would result in a less than significant impact with respect to construction energy usage.

An increase in building square footage from the site improvements at Ione Junior HS to accommodate the relocation of Ione ES would create additional demands for electricity as compared to existing conditions. The proposed school building at Ione Junior HS would not generate an increase in natural gas since the proposed building would be all-electric. Moreover, the proposed school building would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements, which would generally have a greater energy efficiency than the existing buildings.

Under Alternative 2, the increase in student enrollment at Ione Junior HS would generate more electricity and natural gas demand at campus level. However, since the proposed project would not increase student enrollment within the District, the District's natural gas and electricity demand would remain the same. Therefore, the proposed project would not result in wasteful, inefficient, or unnecessary natural gas and electricity demands.

Ione Junior HS would continue to be local-serving land use for the transferred students from Ione ES only located 0.5 miles away. The site improvements at Ione Junior HS under Alternative 2 would also result in an improvement to access at campus, making the flow of traffic more efficient and decreasing transportation-related energy. Overall, energy impacts at Ione Junior HS during construction and operation of Alternative 2 would be similar to the proposed project; however, impacts related to the consumption of energy under Alternative 2 would be less than significant.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional energy impacts would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Under Alternative 2, site improvements at Argonaut HS would require electricity consumption during construction activities. However, similar to the proposed project, electricity demand, would be temporary would not require the use of natural gas, and would cease operating upon completion of the site improvements at Argonaut HS. Thus, the construction energy use related to site improvements under Alternative 2 would be less than significant.

Under Alternative 2, the proposed school building would be all-electric and would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements, and would be consistent with the City of Jackson's EAP goals to reduce energy consumption and GHG emissions. The increase in student enrollment at Argonaut HS would generate more electricity and natural gas demand at campus level. However, since the proposed project would not increase student enrollment within the District, the District's natural gas and electricity demand would remain the same, similar to the proposed project. Thus, the Alternative 2 would not result in wasteful, inefficient, or unnecessary natural gas and electricity demands.

Additionally, similar to the proposed project, site improvements under Alternative 2 would also result in an improvement to the access and circulation system near the Argonaut HS campus, making the flow of traffic more efficient, which would decrease transportation-related energy by increasing drop-off/pick-up zones on campus and reducing the excessive idling, reducing 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. Overall, energy impacts at Argonaut High School during construction and operation of Alternative 2 would be similar to the proposed project's less-than-significant impact.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no additional energy impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

7.5.6 Geology and Soils

Ione Junior High School

Alternative 2 would occur on the same campus as the proposed project. The geological formation that the site is underlain, Ione Formation, is recognized as one of the great fossil leaf-bearing districts in California. As

such, ground disturbing activities have the potential to uncover paleontological resources at the site. In the unlikely event that construction activities encounter paleontological resources, Alternative 2 shall comply with PRC, Chapter 1.7, Sections 5097.5, which prohibits persons from knowingly and willfully excavating upon, or removing, destroying, injuring, or defacing any vertebrate paleontological site, including fossilized footprints or other paleontological feature. With the implementation of Mitigation Measure GEO-1, impacts under Alternative 2 would be less than significant.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional impacts to geological resources would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Alternative 2 would occur on the same campus as the proposed project. Construction activities and earthwork would be the same under this alternative compared to the proposed project, which would require ground-disturbing activities on the campus; thus, in the unlikely event that construction activities encounter paleontological resources, Alternative 2 shall comply with PRC, Chapter 1.7, Sections 5097.5, which prohibits persons from knowingly and willfully excavating upon, or removing, destroying, injuring, or defacing any vertebrate paleontological site, including fossilized footprints or other paleontological feature. Additionally, similar to the proposed project, implementation of Mitigation Measure GEO-1, would reduce potential impacts to less-than-significant levels.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus. Therefore, no additional impacts to geological resources would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

7.5.7 Greenhouse Gas Emissions

Ione Junior High School

Under Alternative 2, site improvements at Ione Junior HS would produce project-related GHG emissions. However, only mobile emissions would increase due to the increase in VMT per student to relocate to Ione Junior HS (Ione ES located 0.5 miles away) and the net decrease in building square footage associated with the closure of the two ACUSD campuses. The proposed school building at Ione Junior HS would be compliant with SMAQMD's applicable Tier 1 BMP all-electric energy systems. Since the site improvements at Ione Junior HS would be consistent with the Climate Change Scoping Plan by implementing SMAQMD's Tier 1 BMP and not exceed SMAQMD's GHG threshold, the site improvements at Ione Junior HS would not generate a net increase in annual GHG emissions that would exceed the SMAQMD's GHG screening threshold. Operational

GHG emissions associated with the site improvements at Ione Junior HS would not result in cumulative contribution to GHG emissions. Therefore impacts related to GHG emission under Alternative 2 would be less than significant.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no impacts to GHG emissions would occur at Amador HS under Alternative 2.

Argonaut High School

Under Alternative 2, site improvements at Argonaut HS would produce project-related GHG emissions, similar to the proposed project. However, only mobile emissions would increase due to the increase in VMT per student to relocate to Argonaut HS and the net decrease in building square footage associated with the closure of the two ACUSD campuses. Site improvements at Argonaut HS would also result in an improvement to the access and circulation system near the Argonaut HS campus, which would make vehicle flow more efficiently and decrease transportation GHG emissions.

Construction of the proposed school building at Argonaut HS would be compliant with SMAQMD's Tier 1 BMP and not exceed SMAQMD's GHG threshold; thus, site improvements at Argonaut HS would not generate a net increase in annual GHG emissions that would exceed the SMAQMD's GHG screening threshold. Additionally, similar to the proposed project, operational GHG emissions associated with the site improvements at Argonaut HS would not result in cumulative contribution to GHG emissions. Therefore, the impacts associated with GHG emissions under Alternative 2 would be similar during construction and operation, compared to the proposed project's less-than-significant impact.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no additional greenhouse gas emission impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

School Closure/Consolidation Program

Alternative 2 would decrease VMT per student by approximately 2.6 percent compared to the proposed project. Therefore, operational GHG emission impacts under the *School Closure/Consolidation Program* would be reduced under Alternative 2, compared to the proposed project.

7.5.8 Hazards and Hazardous Materials

Ione Junior High School

Construction of Alternative 2 would require the use of hazardous materials during construction, such as vehicle fuels, lubricants, grease, transmission fluids, and paints and coatings. However, the materials used would not be in such quantities or stored in a manner that would pose a significant safety hazard. Their use be short term or one time and would cease upon completion of the Alternative 2's construction phase. The handling, use, transport, and disposal of hazardous materials during the construction phase of the proposed project would comply with existing regulations of several agencies—the EPA, Cal/OSHA, US Occupational Safety and Health Administration (OSHA), and USDOT. Compliance with applicable laws and regulations would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. All contaminated waste would be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, adherence to all emergency response plan requirements of Amador County and the Amador Fire Protection Authority (AFPA) would be required throughout the project construction phase.

Operation of Alternative 2 would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities, such as cleaning and maintenance supplies (cleaners, gasoline, paint, and pesticides). Alternative 2 includes various improvements to campus buildings, circulation improvements, and the addition of new buildings and play equipment that would use cleaners and other chemicals in relatively small quantities, which are not typically considered hazardous materials that could result in a significant hazard to the public or the environment. No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur on the campus. Compliance with applicable federal and State laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Therefore, similar to the proposed project, Alternative 2 would not create substantial hazards to the public or the environment; and impacts would be less than significant.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional impacts to hazardous materials would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Under Alternative 2, construction activities would require the use of hazardous materials such as vehicle fuels, lubricants, grease, transmission fluids, and paints and coatings. However, the materials used would not be in such quantities or stored in a manner that would pose a significant safety hazard. Their use would be short term or one time and would cease upon completion of the proposed project's construction phase. The handling, use, transport, and disposal of hazardous materials during the construction phase of the proposed project would comply with existing regulations of several agencies—the EPA, Cal/OSHA, OSHA, and USDOT.

Compliance with applicable laws and regulations would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. All contaminated waste would be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, adherence to all emergency response plan requirements of Amador County and the AFPA would be required throughout the construction phase for Alternative 2.

Similar to the proposed project, operation of Alternative 2 would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities, such as cleaning and maintenance supplies (cleaners, gasoline, paint, and pesticides). Alternative 2 includes various improvements to campus buildings, the addition of new buildings, and accessibility improvements that would use cleaners and other chemicals in relatively small quantities, which are not typically considered hazardous materials that could result in a significant hazard to the public or the environment. No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur on the campus. Compliance with applicable federal and State laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Therefore, similar to the proposed project, Alternative 2 would not create substantial hazards to the public or the environment; and impacts would be less than significant.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no additional hazards and hazardous materials impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

7.5.9 Hydrology and Water Quality

Ione Junior High School

Erosion and siltation impacts that could result from the alteration of drainage patterns would, for the most part, occur during the proposed project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topography, soil type, wind, and rainfall. Siltation is associated with sediment transport and deposition in waterways. The proposed project would not involve the alteration of any natural drainage channels or any watercourse.

The proposed project's construction activities include grading, utilities trenching, asphalt demolition and building construction. If not controlled, the transport of these materials to local waterways would temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. As discussed in Impact 5.9-1, the proposed project would be required to comply with water quality standards, waste discharge requirements, City of Ione Municipal Code (Section 18.16.180 Stormwater Management), PRDs, and submit a SWPPP to the SWRCB for approval prior to the commencement of construction activities. The SWPPP would specify BMPs for reducing or eliminating soil erosion from the site during project construction and operation. Erosion-control measures implemented as part of BMPs may

include the placement of sandbags around basins; use of proper grading techniques; appropriate sloping, shoring, and bracing of the construction site; using mulch, geotextiles, hydroseeding, swales, and earth dikes; and covering topsoil stockpiles. Implementation of SWPPP BMPs would ensure the proposed project does not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant.

The project site is already built out with the existing Ione Junior HS, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping, track and field, and a baseball field). The proposed project would occur in existing facilities and areas that currently contain hardscape, storage containers, and vegetation (trees and grasses); and the increases in impervious surfaces would be minimal. Nonetheless, the proposed improvements at the campus would increase impervious surfaces, compared to existing conditions, which could contribute runoff that could exceed the capacity of existing or planned stormwater drainage systems. Therefore, implementation of Mitigation Measure USS-2 would still be required under Alternative 2 for the preparation of infrastructure studies at Ione Junior HS that would assess and mitigate any storm drain capacity issues. Thus, impacts would be reduced to less than significant with mitigation.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional impacts to hydrology and water quality would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Erosion and siltation impacts that could result from the alteration of drainage patterns would, for the most part, occur during the proposed project's construction phase, which would include site preparation and grading activities. Environmental factors that affect erosion include topography, soil type, wind, and rainfall. Siltation is associated with sediment transport and deposition in waterways. The proposed project would not involve the alteration of any natural drainage channels or any watercourse. As mentioned above, the National Waters Inventory identified a riverine habitat with intermittent/seasonal flows that runs through the Argonaut HS campus. However, this area of the campus is completely developed with a baseball diamond, disturbed land/turf, and the stadium. The proposed project would continue to operate the campus as a high school and use these areas consistent with existing conditions.

The proposed project's construction includes grading, utilities trenching, asphalt demolition, and building construction. If not controlled, the transport of these materials to local waterways would temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. As discussed in Impact 5.9-1, the proposed project would be required to comply with water quality standards, waste discharge requirements, City of Jackson municipal code (Section 17.40.040.7 Grading Design Plan and Section 17.40.050.15 Stormwater Management and Rainwater Retention), PRDs, and submit a SWPPP to the SWRCB for approval prior to the commencement of construction activities. The SWPPP would specify BMPs for reducing or eliminating soil erosion from the site during project construction and operation. Erosion-control measures implemented as part of BMPs may include the placement of sandbags around basins; use of

proper grading techniques; appropriate sloping, shoring, and bracing of the construction site; using mulch, geotextiles, hydroseeding, swales, and earth dikes; and covering topsoil stockpiles. Implementation of SWPPP BMPs would ensure the proposed project does not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant.

The project site is already built out with the existing Argonaut HS, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping, track and field, baseball, and softball fields). The proposed improvements at the campus would increase impervious surfaces, compared to existing conditions, which could contribute runoff that could exceed the capacity of existing or planned stormwater drainage systems. Thus, implementation of Mitigation Measure USS-2 would still be required under Alternative 2 for the preparation of infrastructure studies at Argonaut HS that would assess and mitigate any storm drain capacity issues. Therefore, impacts would be reduced to less than significant with mitigation.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no hydrology and water quality impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

7.5.10 Land Use and Planning

Ione Junior High School

Implementation of Alternative 2, similar to the proposed project, would include adding classrooms and a playground, converting classrooms and restrooms, expanding the parent drop-off area, expanding the kitchen, and constructing a new play structure on the existing school campus. Alternative 2 would not affect the existing land use designation (Public Services) and zoning designation (Public Facilities), and therefore the site improvements at Ione Junior HS would be consistent with the Ione General Plan and zoning code. Additionally, construction would follow applicable State and local building codes. Therefore, the land use impacts at Argonaut HS under Alternative 2 would be less than significant.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional land use impacts would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Implementation of Alternative 2, similar to the proposed project, would include adding buildings, relocating portables, converting classrooms, renovating and expanding gymnasium locker rooms, renovating and

expanding the kitchen, creating a new parent drop-off, creating a new access road connecting to Stony Creek Road, and improving accessibility compliance on the existing school campus. As part of the Alternative 2, the District would obtain a roadway encroachment permit from the City of Jackson to connect the new driveway to Stony Creek Road. The proposed project would not affect the existing land use designation (Public) and zoning designation (Public), and therefore the site improvements at Argonaut HS would be consistent with the Jackson General Plan and zoning code. Additionally, construction would follow applicable State and local building codes. Therefore, the land use impacts at Argonaut HS under Alternative 2 would be less than significant.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no land use and planning impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

7.5.11 Noise

Ione Junior High School

Under Alternative 2, construction activities would not exceed the applicable noise standards set forth by Section 9.16.040 of the Ione Municipal Code, which prohibits construction activities between the hours of 9:00 p.m. and 7:00 a.m. Monday through Thursday, and between 10:00 p.m. and 7:00 a.m. Friday through Sunday, or any time on federal or state holidays. The project is required to adhere to these limitations. The nearest off-site noise-sensitive receptors to the proposed improvements are residences north of the project site fronting Mills Street, with the closest being 300 feet from the project site center.

Under Alternative 2, the existing Ione Junior HS campus would accommodate students from preschool and TK through eighth grade. Similar to the proposed project, multiple site improvements are being proposed, but the improvements that would impact noise-sensitive receptors in the area surrounding the campus are the expansion of drop-off/pick up areas as well as new play structures and hardcourt areas. However, operational noise under Alternative 2 would not exceed the exterior noise standard at any location in the area, similar to the proposed project. However, the cumulative operational noise from traffic is expected to remain significant and unavoidable.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional noise impacts would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Under Alternative 2, the main noise-producing improvements include the construction of a new 2-story building; new parent drop-off location; and a new access road connecting the campus to Stony Creek Road. According to the Jackson Municipal Code Section 4.48.070, construction is prohibited between the hours of 8:00 p.m. and 7:00 a.m. on weekdays that are not holidays, between 7:00 p.m. and 8:00 a.m. on Saturdays, and between 5:00 p.m. and 9:00 a.m. on Sundays. The project is required to adhere to these construction timing limitations. The nearest off-site noise-sensitive receptors to the proposed improvements are residences north of the project site fronting Westview Drive, with the closest being 400 feet from the project site center. Construction activities would not exceed the applicable noise standards.

Under Alternative 2, the existing Argonaut HS campus would serve all county students in grades 9 through 12. Similar to the proposed project, multiple site improvements are proposed, but the improvement that would impact noise-sensitive receptors in the area surrounding the campus is the construction of a new parent drop-off/ pick-up location. However, operational noise would not exceed the noise standard at any location in the area, similar to the proposed project. However, the cumulative operational noise from traffic is expected to remain significant and unavoidable.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no hydrology and water quality impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

School Closure/Consolidation Program

Alternative 2 would decrease transportation impacts compared to the proposed project. Therefore, operational noise impacts under the *School Closure/Consolidation Program* would be reduced under Alternative 2, compared to the proposed project. However, the cumulative operational noise from traffic is expected to remain significant and unavoidable.

7.5.12 Population and Housing

Ione Junior High School

Construction of Alternative 2 would bring construction workers to the project site at Ione Junior HS, starting with site preparation through the complete buildout of the site improvements. General construction labor is expected to be available from the local and regional labor pool. Additionally, construction jobs are short term, spanning the length of the construction phase. The proposed project's construction would not result in a long-term increase in employment and is therefore not expected to attract new residents to the area.

Alternative 2, similar to the proposed project, is a consolidation program to address the decline in enrollment in the District. The additional students at Ione Junior HS would not be new students to the District but existing

students from Ione ES, which is 0.5 mile away. Because this distance is negligible and ACUSD serves the entire county, students and families already live in ACUSD and are unlikely to move residences to be closer to the school. Teachers and staff would continue working at the District and would be reassigned to a new campus. Therefore, Alternative 2 would not result in unplanned indirect population growth in the project area, and impacts would be less than significant.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional impacts to population and housing would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Construction of Alternative 2 would bring construction workers to the project site at Argonaut HS, starting with site preparation through the complete buildout of the site improvements. General construction labor is expected to be available from the local and regional labor pool. Additionally, construction jobs are short term, spanning the length of the construction phase. The proposed project's construction would not result in a long-term increase in employment and is therefore not expected to attract new residents to the area.

Alternative 2, similar to the proposed project, is a consolidation program to address the decline in enrollment in the District. The increase in students at Argonaut HS would not consist of students new to the area, but existing students from Amador HS, which is 4.6 miles away. Since ACUSD serves the entire county and the extra distance is negligible, students and families already live in the ACUSD boundaries and are unlikely to move residences to be closer to the school. The site improvements at Argonaut HS are needed to serve the increase in enrollment capacity and would not attract new residents to the area. Teachers and staff would continue working at the District and would be reassigned to a new campus. Therefore, Alternative 2 would not result in unplanned indirect population growth in the project area, and impacts would be less than significant.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no population and housing impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

7.5.13 Public Services

Ione Junior High School

Alternative 2 would not change the use of the campus nor introduce incompatible uses to the campus. The construction and operation of the campus would comply with the most current adopted California Fire Code and fire and life safety standards of the State of California. As part of the project review process, the DSA and

Ione Fire Department would require approval of building plans for site plan and emergency access, including fire access, bus access and internal circulation. Additionally, DSA and the Ione Fire Department would review site plans and design plans to ensure adequate fire requirements (e.g., the number and locations of fire hydrants, etc.) and emergency access is met. Alternative 2 would be required to comply with the District's Comprehensive School Safety Plan for the campus, which includes life and safety protection objectives and provides framework for its schools before, during, and after an emergency situation, and includes traffic safety. Overall, impacts to public services under Alternative 2 would be similar to the proposed project.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional impacts to public services would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Alternative 2 would not change the use of the campus nor introduce incompatible uses to the campus. The construction and operation of the campus would comply with the most current adopted California Fire Code and fire and life safety standards of the State of California. As part of the project review process, the DSA and Jackson Fire Department would require approval of building plans for site plan and emergency access. DSA and Jackson Fire Department would review site plans and design plans to ensure adequate fire requirements (e.g., the number and locations of fire hydrants, etc.) and emergency access is met. Additionally, Alternative 2 would be required to comply with the District's Comprehensive School Safety Plan for the campus, which includes life and safety protection objectives and provides framework for its schools before, during, and after an emergency situation, and includes safety. Therefore, impacts to public services under Alternative 2 would be similar to the proposed project.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no public services impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

7.5.14 Recreation

Ione Junior High School

Alternative 2 would construct a new playground for preschool, TK, and Extended Learning; a new play structure; and hardcourt areas that would support onsite physical education and scholastic recreational uses onsite. Implementation of Alternative 2 would not induce population growth, and students would be expected to use parks and recreational facilities near their existing residences and/or facilities at Ione Junior HS. Thus,

Alternative 2 would not require the construction, expansion, or alternation of new or existing parks or recreational facilities which might have an adverse physical effect on the environment. Therefore, impacts would be less than significant.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional recreational impacts would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Alternative 2 would not induce population growth within the City of Jackson and would accommodate existing students from within ACUSD's service boundary. The proposed improvements to the campus include the renovation and expansion of the existing gymnasium locker room that would support onsite physical education and scholastic sports onsite. Similar to the proposed project, Alternative 2 would not induce population growth, and students would be expected to use parks and recreational facilities near their existing residences and/or the facilities on the campus. Therefore, Alternative 2 would not require the construction, expansion, or alternation of new or existing parks or recreational facilities which might have an adverse physical effect on the environment, and impacts would be less than significant.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no recreation impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

7.5.15 Transportation

Ione Junior High School

Alternative 2 would require the mobilization of workers, equipment, and haul trucks to and from Ione Junior HS, which would generate a temporary increase in traffic and may cause delays on roadways adjacent to the school. However, the increase in VMT to and around Ione Junior HS would be temporary and may vary depending on the construction phase. To further reduce the amount of VMT to the project site, the construction management team would include strategies to encourage workers to carpool or use transit when possible and source materials and equipment locally.

For the purposes of this analysis the district as a whole was used to calculate changes in VMT as discussed above under *School Closure/Consolidation Program*. Under Alternative 2, VMT per student is estimated to decrease by approximately 2.6 percent compared to the proposed project (see Appendix L). Therefore, transportation impacts at Ione Junior HS would be reduced under Alternative 2.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional transportation impacts would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Alternative 2 would require the mobilization of workers, equipment, and haul trucks to and from Argonaut HS, which would generate a temporary increase in traffic and may cause delays on roadways adjacent to the school. However, the increase in VMT to and around Argonaut HS would be temporary and may vary depending on the construction phase. To further reduce the amount of VMT to the project site, the construction management team would include strategies to encourage workers to carpool or use transit when possible and source materials and equipment locally.

For the purposes of this analysis the district as a whole was used to calculate changes in VMT as discussed above under *School Closure/Consolidation Program*. Under Alternative 2, VMT per student is estimated to decrease by approximately 2.6 percent compared to the proposed project (see Appendix L). Therefore, transportation impacts at Argonaut Hight School would be reduced under Alternative 2.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no transportation impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

School Closure/Consolidation Program

This alternative would result in a reduction in VMT. Under Alternative 2, VMT per student is estimated to decrease by approximately 2.6 percent compared to the proposed project (see Appendix L). Therefore, transportation impacts would be reduced under Alternative 2. However, Alternative 2 would still result in a significant and unavoidable impact even with the incorporation of Mitigation Measure T-1. Thus, Alternative 2 would result in a cumulatively considerable impact on VMT in the area, similar to the proposed project.

7.5.16 Tribal Cultural Resources

Ione Junior High School

During the construction of the site improvements at Ione Junior HS, specifically ground disturbing activities, there is the potential to discover previously unknown tribal cultural resources which might qualify. No known tribal cultural resources have been identified on the project site, so the site improvements at Ione Junior HS would not cause a substantial adverse change in the significance of a known tribal cultural resource, either listed

in the California Register of Historic Resources or in a local register. However, there is a chance that the construction of the Alternative 2 would discover an unknown tribal cultural resource could be discovered that is eligible for listing in the California Register of Historic Resources or in a local register or significant pursuant to criteria set forth in subdivision I of Public Resources Code § 5024.1. Therefore, implementation of Mitigation Measure TCR-1 would be required to reduce potential impacts associated with tribal cultural resources to a level that is less than significant.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional impacts to tribal cultural resources would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

During the construction of the site improvements at Argonaut HS, specifically ground disturbing activities, there is the potential to discover previously unknown tribal cultural resources which might qualify. No known tribal cultural resources have been identified on the project site, so the site improvements at Argonaut HS would not cause a substantial adverse change in the significance of a known tribal cultural resource, either listed in the California Register of Historic Resources or in a local register. However, there is a chance that the construction of the Alternative 2 would discover an unknown tribal cultural resource could be discovered that is eligible for listing in the California Register of Historic Resources or in a local register or significant pursuant to criteria set forth in subdivision(c) of Public Resources Code § 5024.1. Therefore, implementation of Mitigation Measure TCR-1 would be required to reduce potential impacts associated with tribal cultural resources to a level that is less than significant.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no tribal cultural resources impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

7.5.17 Utilities and Service Systems

Ione Junior High School

Under Alternative 2, site improvements would be required and would therefore necessitate the construction of new, on-site sewer lines, similar to the proposed project. Construction impacts associated with the installation of the sewer lines would primarily involve trenching to place the lines below the surface and would be limited to the project site, with minor off-site work associated with nearby sewer connections. Prior to ground disturbance, project contractors would coordinate with the City of Ione to identify the locations and depth of

all sewer lines. Project contractors would notify the City of Ione in advance of proposed ground disturbance activities to avoid sewer lines and disruption of sewer service, and AWA to avoid water lines and disruption of water service.

While the Ione Junior HS would result in an increase in wastewater generation, Alternative 2 in the City of Ione would generate a net decrease of wastewater due to the closure of Ione ES. Thus, Alternative 2 would require the implementation of Mitigation Measure USS-1 for the preparation of infrastructure studies that would assess the proposed project's wastewater generation and determine appropriate actions to mitigate sewer system capacity issues. Therefore, impacts related to wastewater conveyance would be reduced to less than significant with mitigation.

The project site is already built out with the existing Ione Junior HS, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping, track and field, and a baseball field). Similar to the proposed project, the site improvements at Ione Junior HS under Alternative 2 would occur on largely paved/developed areas, where stormwater is presently flows to pervious areas or into the stormwater system. Portions of the development areas are impervious and include vegetation (trees and grasses). The majority of the campus would remain in its current condition. Therefore, the increases in impervious surfaces from the implementation of the site improvements would be minimal. However, implementation of Mitigation Measure USS-2 would still be required under Alternative 2 for the preparation of infrastructure studies at Ione Junior HS that would assess and mitigate any storm drain capacity issues. Thus, impacts would be reduced to less than significant with mitigation.

No additional impacts to solid waste or other utilities would occur as a result of Alternative 2, and no additional mitigation measures would be required.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional impacts to utilities and services systems would occur at Amador HS under Alternative 2, compared to the proposed project.

Argonaut High School

Alternative 2 would require construction of new, on-site water distribution lines to serve the proposed uses. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below the surface and would be limited to on-site water distribution, with minor off-site work associated with connections to the public main. Prior to ground disturbance, project contractors would coordinate with the City of Jackson to identify the locations and depth of all sewer lines. Project contractors would notify the City of Jackson in advance of proposed ground disturbance activities to avoid sewer lines and disruption of sewer service, and AWA to avoid water lines and disruption of water service.

7. Alternatives to the Proposed Project

Water service to the proposed project would continue to be provided by the City of Jackson for domestic and fire protection uses. Prior to the issuance of building permits, the Jackson Fire Department would be required to grant approval of the final building design, including all fire prevention and suppression systems, which would ensure the proposed project is developed pursuant to Fire Code requirements. In addition, on-site water connections would be constructed, as necessary, to comply with the fire flow set for the proposed project by the Jackson Fire Department during the plan check process. All water distribution system connections would comply with Chapter 13.50 of the City's municipal code. Additionally, during the engineering design and plan check process, the City would assess the infrastructure needs of the proposed project to ensure that adequate water infrastructure is available. The design of the proposed project would meet requirements set forth in CalGreen and AWA water use efficiency measures, including separately metering landscaping greater than 5,000 square feet, and consideration of whether recycled water use is feasible. However even with these requirements, the water distribution system might not be able to handle the increase in water demand. Thus, Alternative 2 would require the implementation of Mitigation Measure USS-1 for the preparation of infrastructure studies that would assess the proposed project's wastewater generation and determine appropriate actions to mitigate sewer system capacity issues. Therefore, impacts related to wastewater conveyance would be reduced to less than significant with mitigation.

The project site is already built out with the existing Argonaut HS, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping, track and field, and a baseball field). Similar to the proposed project, the site improvements at Argonaut HS under Alternative 2 would occur on largely paved/developed areas, where stormwater is presently flows to pervious areas or into the stormwater system. Alternative 2 would increase the impervious surfaces on the project site compared to existing conditions which could generate increased runoff. Thus, implementation of Mitigation Measure USS-2 would still be required under Alternative 2 for the preparation of infrastructure studies at Argonaut HS that would assess and mitigate any storm drain capacity issues. Therefore, impacts would be reduced to less than significant with mitigation.

No additional impacts to solid waste or other utilities would occur as a result of Alternative 2, and no additional mitigation measures would be required.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no utilities and service systems impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

School Closure/Consolidation Program

Additionally, operational impacts to utilities and service systems under the *School Closure/Consolidation Program* would be reduced under Alternative 2, compared to the proposed project.

7.5.18 Wildfire

Ione Junior High School

The existing Ione Junior HS campus is fully developed, and has a gentle topography with slight grade changes across the campus. Neither the campus nor surrounding area is within a very high FHSZ. Development of the site improvements at Ione Junior HS would not exacerbate wildfire risks due to slope and prevailing winds that would expose project occupants to elevated particulate concentrations. Additionally, implementation of Alternative 2 would not conflict with the County's LHMP; the surrounding roadways would continue to provide emergency access to the campus and surrounding properties during construction and operational activities. Therefore, impacts to wildfire under Alternative 2 would be less than significant.

Amador High School

Under Alternative 2, no building or site improvements would be proposed at the campus. This alternative would not affect the enrollment capacity on campus compared to the proposed project, and the number of teaching stations on campus would remain the same as the proposed project. Therefore, no additional wildfire impacts would occur at Amador Hight School under Alternative 2, compared to the proposed project.

Argonaut High School

The existing Argonaut HS campus is fully developed, and has a gentle topography with slight grade changes across the campus. Neither the campus nor surrounding area is within a very high FHSZ. Development of the site improvements at Argonaut HS would not exacerbate wildfire risks due to slope and prevailing winds that would expose project occupants to elevated particulate concentrations. Additionally, implementation of Alternative 2 would not conflict with the County's LHMP; the surrounding roadways would continue to provide emergency access to the campus and surrounding properties during construction and operational activities. Therefore, impacts to wildfire under Alternative 2 would be less than significant.

Sutter Creek Elementary School

Under Alternative 2, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no wildfire impacts would occur at Sutter Creek ES under Alternative 2, compared to the proposed project.

7.5.19 Conclusion

Alternative 2 would result in a lower VMT impact compared to the proposed project, since VMT per student is estimated to decrease by approximately 2.6 percent compared to the proposed project. However, due to the anticipated increase in student population at Ione Junior HS and Argonaut HS and the need for additional classrooms on the campuses, this Alternative would increase impacts to aesthetics, air quality, energy, GHG emissions, hydrology and water quality, noise, and utility and service systems. This Alternative would result in similar impacts to biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, population and housing, public services, recreation, tribal cultural resources, and wildfire.

Overall, Alternative 2 would decrease VMT per student compared to the proposed project and the cumulative operational traffic noise impacts would be similar. Operational impacts to air quality, GHG, and transportation under the School Closure/Consolidation Program would be reduced under Alternative 2, compared to the proposed project.

This Alternative would result in similar closure, consolidation, or improvements made to the schools within the District's jurisdiction, compared to the proposed project. This Alternative would meet two of the project objectives but to a lesser degree since Ione Junior HS would limit educational opportunities for 7th and 8th grade students; this alternative would not meet the third objective regarding the closure of two schools to address enrollment fluctuations.

7.6 ALTERNATIVE 3. SCHOOL CONSOLIDATION AT AMADOR HIGH SCHOOL AND ARGONAUT HIGH SCHOOL

Under Alternative 3, the District would balance enrollment between two high school campuses, including Amador High School and Argonaut High School. Under this alternative, 7th through 9th grade students would attend Amador HS and 10th through 12th grade students would attend Argonaut High School. Student enrollment and enrollment capacity at Amador HS would be anticipated to increase by 335 students (938 total) and 100 students (975 students), respectively, compared to the proposed project. Thus, Alternative 3 would require the addition of 4 new teaching stations on the campus. Additionally, student enrollment and enrollment capacity at Argonaut HS would be anticipated to decrease by 335 students (928 students total) and 350 (975 students total), respectively, which would decrease the number of required teaching stations from 53 to 39, compared to the proposed project.

The reconfiguration of grades and relocation of students at Amador High School and Argonaut High School would not require additional construction on the campuses beyond the proposed project. Improvements at Argonaut High School under Alternative 3, would require the construction of 4 new classrooms at Amador HS and 2 new classrooms at Argonaut HS. However, Alternative 3 would require the addition of one portable office relocated from Jackson Jr. High School, instead of four portable classrooms.

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. The enrollment capacity at Sutter Creek Elementary would decrease by approximately 300 students, compared to the proposed project, for a total population of 325 students. This Alternative would not affect the number of teaching stations, and no building or site improvements would be proposed at the campus.

Improvements to all other District campuses, including Ione Junior High School, would remain the same as the proposed project. Sutter Creek Primary would remain open under this alternative.

7.6.1 Aesthetics

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, Alternative 3 would require the construction of new classrooms on the campus.

The proposed classrooms would be similar and height to the existing buildings on the campus and would not generate a new substantial source of light or glare that could affect surrounding properties. Although Alternative 3 would introduce new light and glare sources to the area, the new light and glare sources would be similar to existing conditions and to neighboring uses. Therefore, aesthetic impacts at Amador HS under Alternative 3 would be less than significant.

Overall, due to the additional classrooms that would be required on the campus, impacts to aesthetic resources under Alternative 3 would be greater than the proposed project.

Argonaut High School

Under Alternative 3, the proposed improvements would be made on the existing school campus and would maintain the design features and visual appearance of the campus and surrounding areas, similar to the proposed project. The addition of 2 classrooms would be similar in height and design to other buildings already on campus. The proposed classrooms would be located towards the middle of campus and would be surrounded by existing campus buildings, similar to the proposed project. Other proposed improvements would be within the existing campus and would mostly involve new asphalt pavement and minimal grading which would not affect views. Additionally, building design, materials, and landscaping would be consistent with the existing school buildings and campus and similar to the proposed project.

The combination of building materials along with its location on the campus, the proposed classrooms would not generate a new substantial source of light or glare that could affect surrounding properties. Although the Alternative 3 would introduce new light and glare sources to the area, the new light and glare sources would be similar to existing conditions and to neighboring uses. Therefore, aesthetic impacts at Argonaut High School under Alternative 3 would be less than significant. Overall, impacts to aesthetic resources under Alternative 3 would be reduced, compared to the proposed project.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no aesthetics impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.2 Air Quality

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

Construction improvements at Amador HS would require the implementation of Mitigation Measures AQ-1 and AQ-2 to reduce potentially significant impacts related to construction fugitive dust and criteria pollutants to a less-than-significant level.

This alternative would increase enrollment capacity and staffing, and would increase operational air quality impacts, compared to the proposed project. Therefore, Alternative 3 would result in increased impacts to air quality at Amador HS during construction or operation, compared to the proposed project.

Argonaut High School

Under Alternative 3, construction of the 2 classrooms and renovation of the gymnasium locker rooms would require activities which inherently generate fugitive dust emissions (e.g., demolition, site preparation, grading), similar to the proposed project. Thus, construction improvements at Argonaut HS would require the implementation of Mitigation Measures AQ-1 and AQ-2 to reduce potentially significant impacts related to construction fugitive dust and criteria pollutants to a less-than-significant level.

This alternative would have the lower enrollment capacity and staffing compared the proposed project, and operational air quality impacts would be less than the proposed project and remain less than significant. Therefore, Alternative 3 would reduce the impacts to air quality during construction or operation, compared to the proposed project.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no air quality impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

School Closure/Consolidation Program

Alternative 3 would decrease VMT per student by approximately 0.44 percent compared to the proposed project. Therefore, operational air quality impacts under the *School Closure/Consolidation Program* would be reduced under Alternative 3, compared to the proposed project.

7.6.3 Biological Resources

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

As such, Alternative 3 would require the implementation of Mitigation Measure BIO-1 through BIO-3 at Amador HS, which would ensure adherence to regulatory compliance measures, and reduce potential impacts to any special status animals to a less-than-significant level.

Overall, impacts to biological resources at Amador HS under Alternative 3 would be greater than the proposed project. However, with the implementation of Mitigation Measures BIO-1 through BIO-3, potential impacts to riparian habitats, wetlands, or any native wildlife nursery sites, would be reduced to less-than-significant levels.

Argonaut High School

Construction of Alternative 3 at Argonaut HS would be limited to the BSA on the campus. Similar to the proposed project, there are seven special status animals that have the potential to occur within the Argonaut BSA—Nuttall's woodpecker, yellow-billed magpie, oak titmouse, Lawrence's goldfinch, Bullock's oriole, pallid bat, and Townsend's big-eared bat. Similar to the proposed project, Alternative 3 would require the implementation of Mitigation Measure BIO-1 through BIO-3, which would ensure adherence to regulatory compliance measures, and reduce potential impacts to any special status animals to a less-than-significant level. Since construction is reduced under this alternative, potential biological impacts are reduced compared to the proposed project.

Therefore, Alternative 3 would not result in any additional impacts riparian habitats, wetlands, or any native wildlife nursery sites, compared to the proposed project.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no biological resources impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.4 Cultural Resources

Amador High School

Under Alternative 3, the capacity of Amador HS would increase compared to the proposed project, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

As such, Alternative 3 may result in unanticipated discoveries of archaeological resources or human remains. Therefore, construction activities during Alternative 3 would require the implementation of Mitigation Measure TCR-1, to reduce potentially significant impacts related to the accidental discovery of archaeological resources and human remains to a less-than-significant level.

Overall, impacts to cultural resources at Amador HS under Alternative 3 would be greater than the proposed project. However, with the implementation of Mitigation Measure TCR-1, potential impacts to archaeological resources or human remains would be reduced to less-than-significant levels.

Argonaut High School

The Argonaut HS built environment does not exceed 50 years of age. Therefore, none of the buildings on the Argonaut HS campus meet the eligibility criteria for listing in the NRHP or CRHR. Although no known archaeological resources have been recorded at the project site, ground-disturbing construction activities (e.g., site preparation, grading, excavation, and trenching for utilities) associated with Alternative 3 may result in unanticipated discoveries of archaeological resources or human remains. Therefore, as with the proposed project, construction activities during Alternative 3 would require the implementation of Mitigation Measure TCR-1, to reduce potentially significant impacts related to the accidental discovery of archaeological resources and human remains to a less-than-significant level. Since construction is reduced under this alternative, potential impacts to cultural resources are reduced compared to the proposed project.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no cultural resources impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.5 Energy

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, =which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

Project site improvements at Amador HS would require electricity consumption during construction activities, which would not be required under the proposed project. However, construction electricity demand under Alternative 3 would be temporary, would not require the use of natural gas, and would cease upon completion of the site improvements. Thus, the construction energy use related to site improvements under Alternative 3 would be less than significant.

Under Alternative 3, the additional proposed classrooms would be all-electric and would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements, and would be consistent with the City of Jackson's EAP goals to reduce energy consumption and GHG emissions. The increase in student enrollment at Amador HS would generate more electricity and natural gas demand at campus level. However, Alternative 3 would not increase student enrollment within the District; thus, the District's natural gas and electricity demand would remain the same, similar to the proposed project. Therefore, the Alternative 3 would not result in wasteful, inefficient, or unnecessary natural gas and electricity demands and would result in a less-than-significant impact.

Overall, energy impacts at Amador HS during construction and operation of Alternative 3 would be greater than the proposed project.

Argonaut High School

Under Alternative 3, site improvements at Argonaut HS would require electricity consumption during construction activities. However, similar to the proposed project, electricity demand, would be temporary would not require the use of natural gas, and would cease operating upon completion of the site improvements at Argonaut HS. Thus, the construction energy use related to site improvements under Alternative 3 would be less than significant.

Under Alternative 3, the proposed classrooms would be all-electric and would be required to comply with the applicable Building Energy Efficiency Standards and CALGreen requirements, and would be consistent with the City of Jackson's EAP goals to reduce energy consumption and GHG emissions. The increase in student enrollment at Argonaut HS would generate more electricity and natural gas demand at campus level compared to existing conditions. However, since the proposed project would not increase student enrollment within the District, the District's natural gas and electricity demand would remain the same, similar to the proposed project. Thus, Alternative 3 would not result in wasteful, inefficient, or unnecessary natural gas and electricity demands.

Additionally, similar to the proposed project, site improvements under Alternative 3 would also result in an improvement to the access and circulation system near the Argonaut HS campus, making the flow of traffic

more efficient, which would decrease transportation-related energy by increasing drop-off/pick-up zones on campus and reducing the excessive idling, reducing 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. Overall, energy impacts at Argonaut High School during construction and operation of Alternative 3 would be similar to the proposed project's less-than-significant impact.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no aesthetics impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.6 Geology and Soils

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

Construction activities and earthwork would be greater at Amador HS under Alternative 3, compared to the proposed project; thus, in the unlikely event that construction activities encounter paleontological resources, the Alternative 3 shall comply with PRC, Chapter 1.7, Sections 5097.5, which prohibits persons from knowingly and willfully excavating upon, or removing, destroying, injuring, or defacing any vertebrate paleontological site, including fossilized footprints or other paleontological feature. Additionally, implementation of Mitigation Measure GEO-1, would reduce potential impacts to less-than-significant levels.

Argonaut High School

Alternative 3 would occur on the same campus as the proposed project. Construction activities and earthwork would be the less under this alternative compared to the proposed project, which would require ground-disturbing activities on the campus; thus, in the unlikely event that construction activities encounter paleontological resources, the Alternative 3 shall comply with PRC, Chapter 1.7, Sections 5097.5, which prohibits persons from knowingly and willfully excavating upon, or removing, destroying, injuring, or defacing any vertebrate paleontological site, including fossilized footprints or other paleontological feature. Additionally, similar to the proposed project, implementation of Mitigation Measure GEO-1, would reduce potential impacts to less-than-significant levels.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore,

no geology and soils impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.7 Greenhouse Gas Emissions

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

Under Alternative 3, site improvements at Amador HS would produce project-related GHG emissions, which would not occur under the proposed project. However, only mobile emissions associated with this campus would increase due to the increase students to relocating to Amador HS.

Overall, impacts from GHG emissions at Amador HS under Alternative 3 would be greater than the proposed project. However, construction activities at Amador HS would be compliant with SMAQMD's Tier 1 BMP and not exceed SMAQMD's GHG threshold; thus, site improvements at Amador HS would not generate a net increase in annual GHG emissions that would exceed the SMAQMD's GHG screening threshold. Additionally, operational GHG emissions associated with the site improvements at Amador HS would not result in cumulative contribution to GHG emissions. Therefore, the impacts associated with GHG emissions under Alternative 3 would less-than-significant.

Argonaut High School

Under Alternative 3, site improvements at Argonaut HS would produce project-related GHG emissions during construction and operation, similar to the proposed project. Construction of the proposed 2 classrooms school building at Argonaut HS would be compliant with SMAQMD's Tier 1 BMP and not exceed SMAQMD's GHG threshold; thus, site improvements at Argonaut HS would not generate a net increase in annual GHG emissions that would exceed the SMAQMD's GHG screening threshold.

Site improvements at Argonaut HS would also result in an improvement to the access and circulation system near the Argonaut HS campus, which would make vehicle flow more efficiently and decrease transportation GHG emissions. This Alternative results in a reduction of enrollment, compared to the proposed project. Therefore, operational GHG emissions are anticipated to decrease compared to the proposed project. Additionally, similar to the proposed project, operational GHG emissions associated with the site improvements at Argonaut HS would not result in cumulative contribution to GHG emissions. Therefore, the impacts associated with GHG emissions under Alternative 3 would be reduced during construction and operation, compared to the proposed project's less-than-significant impact.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore,

no greenhouse gas emissions impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

School Closure/Consolidation Program

Alternative 3 would slightly decrease VMT per student by approximately 0.44 percent compared to the proposed project. Therefore, operational GHG emission impacts under the *School Closure/Consolidation Program* would be reduced under Alternative 3, compared to the proposed project.

7.6.8 Hazards and Hazardous Materials

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

Construction activities under Alternative 3 would be greater than the proposed project, and would require the use of hazardous materials such as vehicle fuels, lubricants, grease, transmission fluids, and paints and coatings. However, the materials used would not be in such quantities or stored in a manner that would pose a significant safety hazard. Their use would be short term or one time and would cease upon completion of the proposed project's construction phase. The handling, use, transport, and disposal of hazardous materials during the construction phase of Alternative 3 would comply with existing regulations of several agencies—the EPA, Cal/OSHA, OSHA, and USDOT. Compliance with applicable laws and regulations would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. All contaminated waste would be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, adherence to all emergency response plan requirements of Amador County and the AFPA would be required throughout the construction phase for Alternative 3.

Similar to the proposed project, operation of Alternative 3 would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities, such as cleaning and maintenance supplies (cleaners, gasoline, paint, and pesticides). Alternative 3 would include the implementation of new classrooms on the campus would use cleaners and other chemicals in relatively small quantities, which are not typically considered hazardous materials that could result in a significant hazard to the public or the environment. No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur on the campus. Compliance with applicable federal and State laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur.

Overall, impacts related to hazardous materials would be greater at Amador HS during construction of Alternative 3 and similar during operation of Alternative 3, compared to the proposed project. However, Alternative 3 would not create substantial hazards to the public or the environment; and impacts would be less than significant.

Argonaut High School

Under Alternative 3, construction activities would require the use of hazardous materials such as vehicle fuels, lubricants, grease, transmission fluids, and paints and coatings. However, the materials used would not be in such quantities or stored in a manner that would pose a significant safety hazard. Their use would be short term or one time and would cease upon completion of the proposed project's construction phase. The handling, use, transport, and disposal of hazardous materials during the construction phase of the proposed project would comply with existing regulations of several agencies—the EPA, Cal/OSHA, OSHA, and USDOT. Compliance with applicable laws and regulations would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts. All contaminated waste would be collected and disposed of at an appropriately licensed disposal or treatment facility. Furthermore, adherence to all emergency response plan requirements of Amador County and the AFPA would be required throughout the construction phase for Alternative 3.

Similar to the proposed project, operation of Alternative 3 would transport, use, store, and dispose of small amounts of hazardous materials typical of school facilities, such as cleaning and maintenance supplies (cleaners, gasoline, paint, and pesticides). Alternative 3 includes various improvements to campus buildings, the addition of new buildings, and accessibility improvements that would use cleaners and other chemicals in relatively small quantities, which are not typically considered hazardous materials that could result in a significant hazard to the public or the environment. No manufacturing, industrial, or other uses utilizing large amounts of hazardous materials would occur on the campus. Compliance with applicable federal and State laws and regulations governing the use, storage, transport, and disposal of hazardous materials would ensure that all potentially hazardous materials are used and handled in an appropriate manner and would minimize the potential for safety impacts to occur. Therefore, similar to the proposed project, Alternative 3 would not create substantial hazards to the public or the environment; and impacts would be less than significant.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no hazards and hazardous materials impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.9 Hydrology and Water Quality

Amador High School

Under Alternative 3, the capacity of Amador HS would, increase which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

Construction impacts to hydrology and water quality at Amador HS under Alternative 3 would be greater than the proposed project. Erosion and siltation impacts that could result from the alteration of drainage patterns

would primarily occur during the construction phase of Alternative 3, which would include site preparation and grading activities. Environmental factors that affect erosion include topography, soil type, wind, and rainfall. Siltation is associated with sediment transport and deposition in waterways. Alternative 3 would not involve the alteration of any natural drainage channels or any watercourse. Alternative 3 would be required to comply with water quality standards, waste discharge requirements, applicable requirements from the Sutter Creek Municipal Code, PRDs, and submit a SWPPP to the SWRCB for approval prior to the commencement of construction activities. The SWPPP would specify BMPs for reducing or eliminating soil erosion from the site during project construction and operation. Implementation of SWPPP BMPs would ensure that Alternative 3 does not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site. Thus, impacts would be less than significant.

The project site is already built out with the existing Amador HS, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping, track and field, baseball, and softball fields). The proposed improvements under Alternative 3 would increase impervious surfaces at the campus, compared to the proposed project, which could contribute runoff that could exceed the capacity of existing or planned stormwater drainage systems. Thus, implementation of Mitigation Measure USS-2 would be required under Alternative 3 for the preparation of infrastructure studies at Amador HS that would assess and mitigate any storm drain capacity issues.

Overall, construction and operational impacts to hydrology and water quality at Amador HS under Alternative 3 would be greater than the proposed project. However, with the implementation of Mitigation Measure USS-2, impacts would be reduced to less-than-significant levels.

Argonaut High School

Erosion and siltation impacts that could result from the alteration of drainage patterns would, for the most part, occur during the construction phase of Alternative 3, which would include site preparation and grading activities. Environmental factors that affect erosion include topography, soil type, wind, and rainfall. Siltation is associated with sediment transport and deposition in waterways. Alternative 3 would not involve the alteration of any natural drainage channels or any watercourse. The National Waters Inventory identified a riverine habitat with intermittent/seasonal flows that runs through the Argonaut HS campus. However, this area of the campus is completely developed with a baseball diamond, disturbed land/turf, and the stadium. Alternative 3 would continue to operate the campus as a high school and use these areas consistent with existing conditions.

Construction of Alternative 3 would include grading, utilities trenching, asphalt demolition, and building construction. If not controlled, the transport of these materials to local waterways would temporarily increase suspended sediment concentrations and release pollutants attached to sediment particles into local waterways. Alternative 3 would be required to comply with water quality standards, waste discharge requirements, City of Jackson municipal code (Section 17.40.040.7 Grading Design Plan and Section 17.40.050.15 Stormwater Management and Rainwater Retention), PRDs, and submit a SWPPP to the SWRCB for approval prior to the commencement of construction activities. The SWPPP would specify BMPs for reducing or eliminating soil erosion from the site during project construction and operation. Erosion-control measures implemented as part of BMPs may include the placement of sandbags around basins; use of proper grading techniques;

appropriate sloping, shoring, and bracing of the construction site; using mulch, geotextiles, hydroseeding, swales, and earth dikes; and covering topsoil stockpiles. Implementation of SWPPP BMPs would ensure the proposed project does not substantially alter the existing drainage pattern of the site in a manner that would result in substantial erosion or siltation on- or off-site. Impacts would be less than significant.

The project site is already built out with the existing Argonaut HS, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping, track and field, baseball, and softball fields). The proposed improvements at the campus would increase impervious surfaces, compared to existing conditions, which could contribute runoff that could exceed the capacity of existing or planned stormwater drainage systems. Thus, similar to the proposed project, implementation of Mitigation Measure USS-2 would be required under Alternative 3 for the preparation of infrastructure studies at Argonaut HS that would assess and mitigate storm drain capacity issues. Therefore, with the implementation of mitigation, impacts would be similar to the proposed project's less than significant levels.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no hydrology and water quality impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.10 Land Use and Planning

Amador High School

Implementation of Alternative 3, would not affect the existing land use designation (Public) and zoning designation (Public), and therefore the site improvements at Amador HS would be consistent with the Jackson General Plan and zoning code. Additionally, construction would follow applicable State and local building codes. Therefore, the land use impacts at Amador HS under Alternative 3 would be less than significant, and no additional land use impacts would occur at Amador HS under Alternative 3, compared to the proposed project.

Argonaut High School

Implementation of Alternative 3, would not affect the existing land use designation (Public) and zoning designation (Public), and therefore the site improvements at Argonaut HS would be consistent with the Jackson General Plan and zoning code. Additionally, construction would follow applicable State and local building codes. Therefore, the land use impacts at Argonaut HS under Alternative 3 would be less than significant, and no additional land use impacts would occur at Argonaut HS under Alternative 3, compared to the proposed project.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no land use and planning impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.11 Noise

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

Alternative 3 would result in construction activities at Amador HS, which would not occur under the proposed project. As such, construction noise impacts under Alternative 3 would be greater than the proposed project. However, Alternative 3 would comply with all construction noise regulations to reduce potential impacts to nearby sensitive receptors. Construction of Alternative 3 would be required to adhere to the construction timing limitations outlined in Sutter Creek Municipal Code (see Table 5.11-3, in Section 5.11, *Noise*); therefore, construction activities would not exceed the applicable noise standards.

This alternative would increase enrollment capacity and staffing, and would increase operational noise impacts, compared to the proposed project; however, operational noise would not be expected to exceed the noise standard at any location in the area, similar to the proposed project. The cumulative operational noise from traffic is expected to remain significant and unavoidable.

Argonaut High School

Under Alternative 3, the main noise-producing improvements include the construction of 2 new classrooms; new parent drop-off location; and a new access road connecting the campus to Stony Creek Road. However, Alternative 3 would comply with all construction noise regulations to reduce potential impacts to nearby sensitive receptors. According to the Jackson Municipal Code Section 4.48.070, construction is prohibited between the hours of 8:00 p.m. and 7:00 a.m. on weekdays that are not holidays, between 7:00 p.m. and 8:00 a.m. on Saturdays, and between 5:00 p.m. and 9:00 a.m. on Sundays. The project is required to adhere to these construction timing limitations. The nearest off-site noise-sensitive receptors to the proposed improvements are residences north of the project site fronting Westview Drive, with the closest being 400 feet from the project site center. Construction activities would not exceed the applicable noise standards.

Under Alternative 3, the existing Argonaut HS campus would serve all county students in grades 10 through 12. Similar to the proposed project, multiple site improvements are proposed, but the improvement that would impact noise-sensitive receptors in the area surrounding the campus is the construction of a new parent drop-

off/pick-up location. However, operational noise would not exceed the noise standard at any location in the area, similar to the proposed project.

Since this alternative would result in a reduction of student enrollment capacity and construction, compared to the proposed project, Alternative 3 would reduce noise impacts compared to the proposed project. The cumulative operational noise from traffic is expected to remain significant and unavoidable.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no noise impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

School Closure/Consolidation Program

Alternative 3 would decrease transportation impacts compared to the proposed project. Therefore, operational noise impacts under the *School Closure/Consolidation Program* would be reduced under Alternative 3, compared to the proposed project. However, the cumulative operational noise from traffic is expected to remain significant and unavoidable.

7.6.12 Population and Housing

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

The increase in students at Amador HS would not consist of students new to the area, but existing students from the District. Since ACUSD serves the entire county and the extra distance is negligible, students and families already live in the ACUSD boundaries and are unlikely to move residences to be closer to the school. The site improvements at Amador HS are needed to serve the increase in enrollment capacity and would not attract new residents to the area. Teachers and staff would continue working at the District and would be reassigned to a new campus. Therefore, Alternative 3 would not result in unplanned indirect population growth in the project area, and impacts would be less than significant. No additional population and housing impacts would occur at Amador HS under Alternative 3, compared to the proposed project. Impacts would be similar to the proposed project.

Argonaut High School

Construction of Alternative 3 would bring construction workers to the project site at Argonaut HS, starting with site preparation through the complete buildout of the site improvements. General construction labor is expected to be available from the local and regional labor pool. Additionally, construction jobs are short term,

spanning the length of the construction phase. The proposed project's construction would not result in a long-term increase in employment and is therefore not expected to attract new residents to the area.

Alternative 3, similar to the proposed project, is a consolidation program to address the decline in enrollment in the District. The increase in students at Argonaut HS would not consist of students new to the area, but existing students from Amador HS, which is 4.6 miles away. Since ACUSD serves the entire county and the extra distance is negligible, students and families already live in the ACUSD boundaries and are unlikely to move residences to be closer to the school. The site improvements at Argonaut HS are needed to serve the increase in enrollment capacity and would not attract new residents to the area. Teachers and staff would continue working at the District and would be reassigned to a new campus. Therefore, Alternative 3 would not result in unplanned indirect population growth in the project area, and impacts would be less than significant. No additional population and housing impacts would occur at Argonaut HS under Alternative 3, compared to the proposed project. Impacts would be similar to the proposed project.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no population and housing impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.13 Public Services

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

Overall, due to the additional construction that would be required at Amador HS under Alternative 3, impacts to public services would be greater than the proposed project. However, Alternative 3 would not change the use of the campus nor introduce incompatible uses to the campus. The construction and operation of the campus would comply with the most current adopted California Fire Code and fire and life safety standards of the State of California. As part of the project review process, the DSA and Sutter Creek Fire Protection District would require approval of building plans for site plan and emergency access. DSA and Sutter Creek Fire Protection District would review site plans and design plans to ensure adequate fire requirements (e.g., the number and locations of fire hydrants, etc.) and emergency access is met. Additionally, Alternative 3 would be required to comply with the District's Comprehensive School Safety Plan for the campus, which includes life and safety protection objectives and provides framework for its schools before, during, and after an emergency situation, and includes safety. Therefore, impacts to public services under Alternative 3 would be less than significant, but greater than the proposed project.

Argonaut High School

Alternative 3 would not change the use of the campus nor introduce incompatible uses to the campus; however, this alternative would have reduced enrollment compared to the proposed project. The construction and operation of the campus would comply with the most current adopted California Fire Code and fire and life safety standards of the State of California. As part of the project review process, the DSA and Jackson Fire Department would require approval of building plans for site plan and emergency access. DSA and Jackson Fire Department would review site plans and design plans to ensure adequate fire requirements (e.g., the number and locations of fire hydrants, etc.) and emergency access is met. Additionally, Alternative 3 would be required to comply with the District's Comprehensive School Safety Plan for the campus, which includes life and safety protection objectives and provides framework for its schools before, during, and after an emergency situation, and includes safety. Therefore, impacts to public services under Alternative 3 would be less than significant, but reduced compared to the proposed project.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no public services impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.14 Recreation

Amador High School

Implementation of Alternative 3 would not induce population growth within the City of Sutter Creek and would accommodate existing students in grades 7 through 9 from within ACUSD's service boundary. Students would be expected to use parks and recreational facilities near their existing residences and/or facilities at Amador HS. Thus, Alternative 3 would not require the construction, expansion, or alternation of new or existing parks or recreational facilities which might have an adverse physical effect on the environment. Therefore, impacts would be less than significant.

Argonaut High School

Alternative 3 would not induce population growth within the City of Jackson and would accommodate existing students from within ACUSD's service boundary. The proposed improvements to the campus include the renovation and expansion of the existing gymnasium locker room that would support onsite physical education and scholastic sports onsite. Similar to the proposed project, Alternative 3 would not induce population growth, and students would be expected to use parks and recreational facilities near their existing residences and/or the facilities at Argonaut HS. Therefore, Alternative 3 would not require the construction, expansion, or alternation of new or existing parks or recreational facilities which might have an adverse physical effect on the environment, and impacts would be less than significant.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no recreation impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.15 Transportation

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

Alternative 3 would require the mobilization of workers, equipment, and haul trucks to and from Amador HS, which would not occur under the proposed project. This would generate a temporary increase in traffic and may cause delays on roadways adjacent to the school. However, the increase in VMT to and around Amador HS would be temporary and may vary depending on the construction phase. To further reduce the amount of VMT to the project site, the construction management team would include strategies to encourage workers to carpool or use transit when possible and source materials and equipment locally.

For the purposes of this analysis the district as a whole was used to calculate changes in VMT as discussed under the School Closure/Consolidation Program. Under Alternative 3, VMT per student is estimated to decrease by approximately 0.44 percent compared to the proposed project (see Appendix L). Therefore, transportation impacts at Amador High School would be reduced under Alternative 3.

Argonaut High School

Alternative 3 would require the mobilization of workers, equipment, and haul trucks to and from Argonaut HS, which would generate a temporary increase in traffic and may cause delays on roadways adjacent to the school. However, the increase in VMT to and around Argonaut HS would be temporary and may vary depending on the construction phase. To further reduce the amount of VMT to the project site, the construction management team would include strategies to encourage workers to carpool or use transit when possible and source materials and equipment locally.

For the purposes of this analysis the district as a whole was used to calculate changes in VMT as discussed under the School Closure/Consolidation Program. Under Alternative 3, VMT per student is estimated to decrease by approximately 0.44 percent compared to the proposed project (see Appendix L). Therefore, transportation impacts at Argonaut High School would be reduced under Alternative 3.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would

be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no transportation impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

School Closure/Consolidation Program

This alternative would result in a reduction in VMT. Under Alternative 3, VMT per student is estimated to decrease by approximately 0.44 percent compared to the proposed project (see Appendix L). Therefore, transportation impacts would be reduced under Alternative 3. However, Alternative 3 would still result in a significant and unavoidable impact even with the incorporation of Mitigation Measure T-1. Thus, Alternative 3 would result in a cumulatively considerable impact on VMT in the area, similar to the proposed project.

7.6.16 Tribal Cultural Resources

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

As such potential construction impacts under Alternative 3 would be greater than the proposed project. During the construction of the site improvements at Amador HS, specifically ground disturbing activities, there is the potential to discover previously unknown tribal cultural resources which might qualify. No known tribal cultural resources have been identified on the project site, so the site improvements at Amador HS would not cause a substantial adverse change in the significance of a known tribal cultural resource, either listed in the California Register of Historic Resources or in a local register. However, there is a chance that the construction of the Alternative 3 would discover an unknown tribal cultural resource could be discovered that is eligible for listing in the California Register of Historic Resources or in a local register or significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. Therefore, implementation of Mitigation Measure TCR-1 would be required to reduce potential impacts associated with tribal cultural resources to a level that is less than significant.

Argonaut High School

During the construction of the site improvements at Argonaut HS, specifically ground disturbing activities, there is the potential to discover previously unknown tribal cultural resources which might qualify. No known tribal cultural resources have been identified on the project site, so the site improvements at Argonaut HS would not cause a substantial adverse change in the significance of a known tribal cultural resource, either listed in the California Register of Historic Resources or in a local register. However, there is a chance that the construction of the Alternative 3 would discover an unknown tribal cultural resource could be discovered that is eligible for listing in the California Register of Historic Resources or in a local register or significant pursuant to criteria set forth in subdivision (c) of Public Resources Code § 5024.1. Therefore, implementation of Mitigation Measure TCR-1 would be required to reduce potential impacts associated with tribal cultural resources to a level that is less than significant. Compared to the proposed project, the reduction in construction

under this alternative would reduce the potential of encountering unknown tribal cultural resources. Therefore, compared to the proposed project, impact would be reduced.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no tribal cultural resources impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.17 Utilities and Service Systems

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

Construction impacts to utilities and service systems at Amador HS under Alternative 3 would be greater than the proposed project. Construction of the Alternative 3 would require new water line nor wastewater line connections. However, it would require extension of electrical lines and stormwater infrastructure to the classrooms.

Water service to the proposed project would continue to be provided by the City of Sutter Creek for domestic and fire protection uses. Prior to the issuance of building permits, the Sutter Creek Fire Protection District would be required to grant approval of the final building design, including all fire prevention and suppression systems, which would ensure the proposed project is developed pursuant to Fire Code requirements. In addition, on-site water connections would be constructed, as necessary, to comply with the fire flow set for the proposed project by the Sutter Creek Fire Protection District during the plan check process. All water distribution system connections would comply with the City's municipal code. Similar to the proposed project, the water distribution system might not be able to handle the increase in water demand. Thus, Alternative 3 would require the implementation of Mitigation Measure USS-1 for the preparation of water/wastewater infrastructure studies. Therefore, impacts related to wastewater conveyance would be reduced to less than significant with mitigation.

The project site is already built out with the existing Amador HS, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping, track and field, and a baseball field). Similar to the proposed project, the site improvements at Amador HS under Alternative 3 would occur on largely paved/developed areas, where stormwater is presently flows to pervious areas or into the stormwater system. Alternative 3 would increase the impervious surfaces on the project site compared to existing conditions which could generate increased runoff. Thus, implementation of Mitigation Measure USS-2 would still be required under Alternative 3 for the preparation of storm drainage infrastructure studies. Therefore, impacts would be reduced to less than significant with mitigation.

No additional impacts to solid waste would occur as a result of Alternative 3, and no additional mitigation measures would be required. Compared to the proposed project, this alternative would result in greater utilities and service systems impacts at Amador HS.

Argonaut High School

Alternative 3 would require construction of new, on-site water distribution lines to serve the proposed uses. Construction impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below the surface and would be limited to on-site water distribution, with minor off-site work associated with connections to the public main. Prior to ground disturbance, project contractors would coordinate with the City of Jackson to identify the locations and depth of all sewer lines. Project contractors would notify the City of Jackson in advance of proposed ground disturbance activities to avoid sewer lines and disruption of sewer service, and AWA to avoid water lines and disruption of water service.

Water service to the proposed project would continue to be provided by the City of Jackson for domestic and fire protection uses. Prior to the issuance of building permits, the Jackson Fire Department would be required to grant approval of the final building design, including all fire prevention and suppression systems, which would ensure the proposed project is developed pursuant to Fire Code requirements. In addition, on-site water connections would be constructed, as necessary, to comply with the fire flow set for the proposed project by the Jackson Fire Department during the plan check process. All water distribution system connections would comply with Chapter 13.50 of the City's municipal code. Additionally, during the engineering design and plan check process, the City would assess the infrastructure needs of the proposed project to ensure that adequate water infrastructure is available. The design of the proposed project would meet requirements set forth in CalGreen and AWA water use efficiency measures, including separately metering landscaping greater than 5,000 square feet, and consideration of whether recycled water use is feasible. However even with these requirements, the water distribution system might not be able to handle the increase in water demand. Thus, Alternative 3 would require the implementation of Mitigation Measure USS-1. Therefore, impacts related to wastewater conveyance would be reduced to less than significant with mitigation.

The project site is already built out with the existing Argonaut HS, which includes impervious surfaces (i.e., classroom buildings and hardscape) and pervious surfaces (landscaping, track and field, and a baseball field). Similar to the proposed project, the site improvements at Argonaut HS under Alternative 3 would occur on largely paved/developed areas, where stormwater is presently flows to pervious areas or into the stormwater system. Alternative 3 would increase the impervious surfaces on the project site compared to existing conditions which could generate increased runoff. Thus, implementation of Mitigation Measure USS-2 would still be required under Alternative 3. Therefore, impacts would be reduced to less than significant with mitigation.

No additional impacts to solid waste or other utilities would occur as a result of Alternative 3, and no additional mitigation measures would be required. Compared to the proposed project, this alternative would result in reduced utilities and service systems impacts at Argonaut HS.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no utilities and service systems impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

School Closure/Consolidation Program

Additionally, operational impacts to utilities and service systems under the *School Closure/Consolidation Program* would be similar under Alternative 3, compared to the proposed project.

7.6.18 Wildfire

Amador High School

Under Alternative 3, the capacity of Amador HS would increase, which would require the addition of 4 new teaching stations on the campus. Thus, unlike the proposed project, Alternative 3 would require construction on the Amador HS campus for the implementation of new classrooms.

The existing Amador HS campus is fully developed. Neither the campus nor surrounding area is within a very high FHSZ. Development of the site improvements at Amador HS would not exacerbate wildfire risks due to slope and prevailing winds that would expose project occupants to elevated particulate concentrations. Additionally, implementation of Alternative 3 would not conflict with the County's LHMP; the surrounding roadways would continue to provide emergency access to the campus and surrounding properties during construction and operational activities. Therefore, impacts to wildfire under Alternative 3 would be less than significant, similar to the proposed project.

Argonaut High School

The existing Argonaut HS campus is fully developed and has a gentle topography with slight grade changes across the campus. Neither the campus nor surrounding area is within a very high FHSZ. Development of the site improvements at Argonaut HS would not exacerbate wildfire risks due to slope and prevailing winds that would expose project occupants to elevated particulate concentrations. Additionally, implementation of Alternative 3 would not conflict with the County's LHMP; the surrounding roadways would continue to provide emergency access to the campus and surrounding properties during construction and operational activities. Therefore, impacts to wildfire under Alternative 3 would be less than significant, similar to the proposed project.

Sutter Creek Elementary School

Under Alternative 3, Sutter Creek Elementary School would serve students in grade 3 through 6, and would not result in an increase in capacity, compared to the proposed project. No building or site improvements would be proposed at the campus, and the campus would continue operating similar to existing conditions. Therefore, no wildfire impacts would occur at Sutter Creek ES under Alternative 3, compared to the proposed project.

7.6.19 Conclusion

Alternative 3 would lessen transportation since VMT per student is estimated to decrease by approximately 0.44 percent compared to the proposed project. Due to the anticipated increase in student population at Amador HS this Alternative would result in increased impacts to aesthetics, air quality, biological resources, cultural resources, energy, geology and soils, GHG emissions, hazards and hazardous materials, hydrology and water quality, public services, noise, tribal cultural resources, and utility and service systems at Amador HS, compared to the proposed project.

However, due to the decrease in student population at Argonaut HS and Sutter Creek ES, this Alternative would result in similar impacts to aesthetics, air quality, biological resources, cultural resources, energy, GHG emissions, geology and soils, hazards and hazardous materials, hydrology and water quality, land use and planning, population and housing, public services noise, recreation, tribal cultural resources, utility and service systems, and wildfire, at Argonaut HS and Sutter Creek ES, compared to the proposed project.

Overall, Alternative 3 would decrease VMT per student compared to the proposed project and cumulative impact related to operational traffic noise would be similar. Therefore, operational impacts to air quality, GHG, and transportation under the School Closure/Consolidation Program would be reduced under Alternative 3, compared to the proposed project.

This Alternative would result in similar closure, consolidation, or improvements made to the schools within the District's jurisdiction, compared to the proposed project. Therefore, this Alternative would two of the project objectives but to a lesser degree. The alignment between 7th, 8th, and 9th-grades academic needs would require more resources and costs than the proposed project to provide a comprehensive and fulfilling learning and social environment and extracurricular opportunities for 9th graders. This alternative would not meet the third objective regarding the closure of two schools to address enrollment fluctuations.

7.7 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA requires a lead agency to identify the "environmentally superior alternative" and, in cases where the "No Project" Alternative is environmentally superior to the proposed project, the environmentally superior development alternative must be identified. One alternative has been identified as "environmentally superior" to the proposed project:

- Alternative 2: School Consolidation at Ione Junior High School, Amador High School, and Argonaut High School

"Among the factors that may be used to eliminate alternatives from detailed consideration in an EIR are: (i) failure to meet most of the basic project objectives, (ii) infeasibility, or (iii) inability to avoid significant environmental impacts" (CEQA Guidelines § 15126.6[c]).

Alternative 2 would lessen transportation since VMT per student is estimated to decrease by approximately 2.6 percent compared to the proposed project, and would result in similar impacts to biological resources, cultural resources, geology and soils, hazards and hazardous materials, land use and planning, population and housing,

public services, recreation, tribal cultural resources, and wildfire. However, due to the anticipated increase in student population at Ione Junior HS and Argonaut HS and the need for additional classrooms on the campuses, this Alternative would increase impacts to aesthetics, air quality, energy, GHG emissions, hydrology and water quality, noise, and utility and service systems.

Although Alternative 2 would reduce some environmental impacts, compared to the proposed project, concerns arise about academic disadvantages for Ione Junior HS students in 7th and 8th grades, where single-subject instruction is lacking due to low student numbers, impacting educational quality for both Ione Junior HS and county students.

Overall, Alternative 2 would decrease VMT per student compared to the proposed project and would have similar cumulative impact related to operational traffic noise. Therefore, operational impacts to air quality, GHG, and transportation under the School Closure/Consolidation Program would be reduced under Alternative 2, compared to the proposed project.

Although Alternative 2 would require additional site improvements at Argonaut HS to accommodate the proposed increase in enrollment, this Alternative would result in similar closure, consolidation, or improvements made to the schools within the District's jurisdiction, compared to the proposed project. However, under this Alternative Ione Junior HS would remain operational for students from preschool through 8th grade. This would relocate students from Ione Elementary School to the Ione Junior High School campus, creating a comprehensive campus, and allowing students to stay until 8th grade.

As such, this Alternative would meet two of the project objectives but to a lesser degree since more cost and resources would be needed to maintain Sutter Creek Primary operational. Therefore, Alternative 2 would maintain Sutter Creek Primary open and it would not meet the third objective of "addressing enrollment fluctuations by consolidating schools and closing two schools".

These factors will be considered by the ACUSD decision makers in determining whether to approve the proposed project or one of the alternatives identified.

8. Impacts Found Not to Be Significant

California Public Resources Code Section 21003 (f) states: "…it is the policy of the state that…[a]ll persons and public agencies involved in the environmental review process be responsible for carrying out the process in the most efficient, expeditious manner in order to conserve the available financial, governmental, physical, and social resources with the objective that those resources may be better applied toward the mitigation of actual significant effects on the environment." This policy is reflected in the State California Environmental Quality Act (CEQA) Guidelines (Guidelines) Section 15126.2(a), which states that "[a]n EIR [Environmental Impact Report] shall identify and focus on the significant environmental impacts of the proposed project" and Section 15143, which states that "[t]he EIR shall focus on the significant effects on the environment." Guidelines Section 15128 requires that an EIR contain a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and were therefore not discussed in detail in the Draft EIR.

As required by Section 15128 of the CEQA Guidelines, an EIR shall contain a brief discussion stating the reasons why various possible significant effects of a project were determined to not be significant and are therefore not discussed in detail in the EIR. In accordance with the CEQA Guidelines, this section discusses the environmental issue areas where impacts were found to not be significant and were therefore not discussed in detail in the Draft EIR. This chapter includes the analysis for the following environmental topics where the project would have no impact:

- Agriculture and Forestry Resources
- Mineral Resources

The following 18 topics are analyzed in Chapter 5 of this EIR.

- Aesthetics
- Air Quality
- Biological Resources
- Cultural Resources
- Energy
- Geology & Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Land Use & Planning
- Noise
- Population & Housing
- Public Services
- Recreation
- Transportation
- Tribal Cultural Resources
- Utilities & Service Systems
- Wildfire

8.1 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.

8. Impacts Found Not to Be Significant

In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board. Would the project:

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

No Impact. The Department of Conservation's Farmland Mapping and Monitoring Program maps California's agricultural resources and determines the suitability of land throughout the state for agriculture purposes. The Department of Conservation (DOC) produces these maps on a statewide level and by county. The eight campuses are in urbanized areas in the cities of Ione, Sutter Creek, and Jackson, and are operated by the Amador County Unified School District. Each campus that would be affected by the proposed project is developed with ACUSD school uses, and as described further in Chapter 3, *Project Description*, and are surrounded by undeveloped land, civic, commercial and residential uses. The campuses do not contain Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (DOC 2023a). Further, the DOC map shows that all eight campuses are located on land identified as "Urban and Built-Up Land" (DOC 2023a).

As described in Chapter 3, *Project Description*, the three project sites that would undergo site improvements as part of the proposed project are currently zoned as Public Service (PS), Public, or Public Facilities, with a land use designation of Public Service (P-S) or Public. None of the project sites are zoned for agriculture. Therefore, implementation of the proposed project and development on the three project sites would not convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a nonagricultural use, and no impact would occur.

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

No Impact. The proposed project would consolidate eight school campuses into six campuses within the ACUSD and add site improvements at three campuses. All campuses are currently developed and operate as schools. The school campuses are not zoned for agricultural uses (Ione 2009, Jackson 2014, Sutter Creek 2016) and do not contain Williamson Act contracts (DOC 2023b). There are two Williamson Act contract properties to the south and north of Argonaut HS; however, the proposed project would not affect these properties. Therefore, the proposed project would not conflict with an existing zone for agricultural use or conflict with a Williamson Act contract. No impact would occur.

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

No Impact. The project sites are in three cities that are mostly urbanized, and there is no forest land or timberland near the project sites. The proposed project would consolidate eight school campuses into six campuses within the ACUSD and add site improvements at three campuses. All campuses are currently

developed and operate as schools. The school campuses are not zoned for forest land nor timberland (Ione 2009, Jackson 2014, Sutter Creek n.d.). The three project sites undergoing improvements are currently zoned Public Service (PS), Public, or Public Facilities, with a land use designation of Public Service (P-S) or Public. None of the associated zoning is used for forest land or timberland. The proposed project would not conflict with existing zoning nor cause the rezoning of forest land or timberland. Therefore, no impact would occur.

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

No Impact. The campuses are within urbanized areas of the Ione, Jackson, and Sutter Creek. The campuses are developed with school uses and do not contain forest land. Therefore, implementation of the proposed project, including the site improvements to the three campuses, would not result in the loss of forest land or the conversion of forest land to nonforest use, and 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. The proposed project would consolidate eight school campuses into six campuses within the ACUSD and add site improvements at three campuses. All campuses are currently developed and operate as schools. The school campuses are not zoned for agricultural, forest land, nor timberland uses (Ione 2009, Jackson 2014, Sutter Creek n.d.) and do not contain Williamson Act contracts. The Farmland Mapping and Monitoring Program characterizes the campuses as "Urban and Built-Up Land" (DOC 2023a). The implementation of the proposed project would not result in the conversion of Farmland to nonagricultural uses nor the conversion of forest land to nonforest uses. Development of the site improvements at Argonaut HS, Ione Junior HS, and Sutter Creek ES would be limited to the project sites as shown in Figures 3-3, 3-4, and 3-5. The site improvements would not result in the conversation of farmland to a non-agricultural use or of forest land to a non-forest use. No impact would occur.

8.2 MINERAL RESOURCES

Would the project:

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

No Impact. The California Geological Survey Mineral Resources Project provides information about California's nonfuel mineral resources. The Mineral Resources Project classifies lands throughout the state that contain regionally significant mineral resources, as mandated by Surface Mining and Reclamation Act of 1975. The California Geological Survey classifies mineral resources area as one of the four Mineral Resource Zones (MRZ). Based on the California Division of Mines and Geology, *Mineral Land Classification Map of the Sutter Creek 15-minute Quadrangle*, Ione ES and Ione Junior HS are within MRZ-2b(i) (DOC 1983). Lands classified as MRZ-2b(i) are areas with underline deposits containing industrial minerals where geologic information indicates significant inferred resources of rock suitable for use as a marketable product are present. The Mineral Land Classification Map identifies Sutter Creek ES, Sutter Creek Primary, Amador HS, Argonaut HS, Jackson

8. Impacts Found Not to Be Significant

Junior HS, and Jackson ES as within MRZ 4(i). Lands classified as MRZ 4(i) are areas where geologic information is insufficient to determine the presence or absence of industrial mineral resources. The eight District campuses are developed with existing school campuses and operate as schools; none of the campuses include mineral extraction activities onsite. Therefore, implementation of the proposed project would not result in the loss of availability of known mineral resources. No impact would occur.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?

No Impact. The project sites are within MRZ-2b(i) and MRZ 4(i), indicating the potential for underlying deposits mineral resources and insufficient information to determine the presence of mineral resources, respectively (DOC 1983). The City of Jackson General Plan land use plan does not designate area for mining or areas of locally important mineral resources (Jackson 2014). The Jackson Junior HS and Jackson ES are designated as public facilities. The City of Ione zoning map identifies land uses designated for Heavy Industrial and Mining (M-2). Ione ES and Ione Junior HS are not zoned M-2; the campuses are designated as Pubic Facilities (PF) (Ione 2009). City of Sutter Creek General Plan Figure LU-1, *Land Use Diagram*, contains a Mining designation (M) for lands with mineral resources. Amador HS, Sutter Creek ES, Sutter Creek Primary, Amador HS have a land use designation of Public Services (PS) and do not have a mining designation (Sutter Creek 2016). All the project sites are developed with school facilities and operate as schools, and no mineral extraction operations occur on the project sites. Therefore, the proposed project would not impact the availability of a locally important mineral resource. No impacts would occur.

8.3 REFERENCES

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Sutter Creek, City of. 2016. Zoning Map. https://www.cityofsuttercreek.org/2016-planning-department/SutterCreekZoningMap.pdf.

8. Impacts Found Not to Be Significant

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9. Significant Irreversible Changes Due to the Proposed Project

Section 15126.2(c) of the CEQA Guidelines requires that an Environmental Impact Report (EIR) describe any significant irreversible environmental changes that would be caused by the proposed project should it be implemented.

> Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highways improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.

In the case of the School Closure/Consolidation Program Project (proposed project), implementation would cause the following irreversible changes:

- Construction of the proposed project would include construction activities that would entail the commitment of nonrenewable and/or slowly renewable energy resources, human resources, and natural resources such as lumber and other forest products, sand and gravel, asphalt, steel, copper, lead, other metals, water, and fossil fuels.

- Operation of the proposed project would also require the use of natural gas and electricity, petroleum-based fuels, fossil fuels, and water.

- Operation of the proposed improvements would require a continued commitment of social services and public maintenance services (e.g., police, fire, electricity, and water and wastewater services).

- Construction activities at the three campuses related to project implementation would entail ground-disturbing activities and increase vehicle trips over the short term. Emissions associated with ground disturbance and vehicle trips would contribute to the Mountain Counties Air Basin's nonattainment designation for ozone (O_3) under the California and National Ambient Air Quality Standards (AAQS), and contribute to PM_{10} and $PM_{2.5}$, ROG, NO_X, and CO levels in the Air Basin.

- Operation of the proposed project would be below the Sacramento Metropolitan Air Quality Management District's significance thresholds. However, 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 over the long term would continue to contribute to the Mountain Counties Air Basin's nonattainment

9. Significant Irreversible Changes Due to the Proposed Project

designation for ozone (O_3) under the California and AAQS, and contribute to PM_{10} and $PM_{2.5}$, ROG, NO_X, and CO levels in the Air Basin.

The commitment of resources required for the construction and operation of the proposed project would limit the availability of such resources for future generations or for other uses during the life of the project. However, the proposed project does not represent an uncommon construction project that uses an extraordinary amount of raw materials in comparison to other development projects of a similar scope and magnitude. Further, the purpose of the proposed project is to consolidate school resources for efficient program administration and focusing resources on fewer facilities, so the operation of the proposed project would more efficiently use natural resources.

10. Growth-Inducing Impacts of the Proposed Project

10.1 INTRODUCTION

Pursuant to Sections 15126(d) and 15126.2(e) of the CEQA Guidelines, this section of the Draft Environmental Impact Report (DEIR) is provided to examine how the proposed project could foster economic or population growth through the construction of additional housing, either directly or indirectly. The analysis considers whether the proposed project would remove obstacles to population growth (such as infrastructure expansions) or encourage/facilitate other activities that could significantly affect the environment. Not all aspects of growth inducement are negative; instead, negative impacts associated with growth inducement occur only where the growth related to the project would cause adverse environmental impacts.

Growth-inducing impacts fall into two categories: direct or indirect. Direct growth-inducing impacts are generally associated with providing urban services to an undeveloped area. Indirect, or secondary, growth-inducing impacts consist of growth-induced in the region by additional demand for housing, goods, and services associated with a population increase caused by or attracted to a new project. This analysis provides an overall discussion of project impacts and considers utility infrastructure and circulation to determine whether the project would result in direct or indirect growth inducement.

10.2 GROWTH-INDUCING EFFECTS

The proposed project includes the implementation, construction, and operation of the School Closure/Consolidation Program Project. The implementation of the proposed project would consolidate school facilities from eight schools onto six existing ACUSD campuses. As part of the proposed project, three campuses would experience an increase in enrollment capacity and would include site improvements to accommodate the increase in enrollment capacity (including Argonaut HS, Ione Junior HS, and Sutter Creek ES). As discussed in Section 5.12, *Population and Housing*, the proposed project would not generate population growth since the proposed project is not adding housing.

The campuses are in urban areas with an established infrastructure system. Site improvements at the three campuses would require local utility lines and hook-ups to the new buildings and connections to existing water and sewer mains. However, no major supporting infrastructure, such as roads, water or sewer mains, wastewater treatment facilities, or landfills, would require expansion to meet the project's needs. Therefore, any improvements associated with the project would directly serve the proposed uses and would not remove obstacles to growth through the construction or extension of major infrastructure that does not presently exist.

10. Growth-Inducing Impacts of the Proposed Project

Further, the purpose of the proposed project is to consolidate school resources for efficient program administration and focusing resources on fewer facilities to better serve staff and students. The site improvements proposed at Argonaut HS, Ione Junior HS, and Sutter Creek ES would serve each respective campus and would not lead to other, off-site induced growth. The proposed project does not involve uses that could directly or indirectly result in growth-inducing impacts or other environmental effects not otherwise disclosed in this DEIR. The proposed project would not affect the development of any other property. The implementation of the proposed project would not indirectly cause growth. Therefore, the proposed project would not result in direct or indirect growth-inducing impacts.

11. Organizations and Persons Consulted

City of Ione

John Alfred, Police Chief, Ione Police Department

Ken Makey, Fire Chief, Ione Fire Department

City of Jackson

Christopher Mynderup, Chief of Police, Jackson Police Department

United States Environmental Protection Agency

John Hillenbrand, Geologist

11. Organizations and Persons Consulted

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12. Qualifications of Persons Preparing EIR

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