



SACRAMENTO CITY UNIFIED SCHOOL DISTRICT BOARD OF EDUCATION

Agenda Item 11.1h

Meeting Date: August 17, 2023

Subject: Approve Resolution No. 3335: Oak Ridge Elementary School Rebuild Project (MND)

- Information Item Only
- Approval on Consent Agenda
- Conference (for discussion only)
- Conference/First Reading (Action Anticipated: _____)
- Conference/Action
- Action
- Public Hearing

Division: Facilities Support Services

Recommendation: Receive for review the Initial Study/Mitigated Negative Declaration (MND), including the public comments received, and the Mitigation Monitoring and Reporting Program (MMRP) for the Oak Ridge Elementary School Rebuild Project. The California Environmental Quality Act (CEQA) requires the adoption of such a resolution for this project. Resolution No. 3335 is attached which approves the MND and mitigation measures included in the MMRP.

Background/Rationale: The Oak Ridge Elementary School Rebuild Project is one of the three initial large projects using Measure H bond funds. The project will allow for the development of a larger multipurpose room that can more easily house indoor recess in inclement weather, provide adequate play yard and outdoor physical activity space, and address all six of the petals outlined within the District's Educational Specifications as part of the Facilities Master Plan.

The proposed project is subject to review under CEQA. For every non-exempt public project, CEQA generally requires the Lead Agency to prepare an Initial Study in order to determine the level of environmental review that is required for CEQA compliance. If the Initial Study indicates that the project will not result in significant environmental impacts, the Lead Agency may adopt a "negative declaration" rather than preparing a full Environmental Impact Report (Pub. Res. Code Section 21080 (c)). If the Initial Study reveals substantial evidence that significant environmental impacts might occur, but also identifies mitigation measures that reduce those impacts to a level of less than significant, the lead agency may satisfy CEQA obligations with a "Mitigated Negative Declaration" (Pub. Res. Code Section 21064.5 & Section 21080 (d)).

Consistent with this process, an Initial Study was prepared which determined that the proposed project may result in significant environmental impacts, but that the mitigation measures would

reduce those impacts to a level of less than significant. Therefore, a Mitigated Negative Declaration (MND) was prepared. In compliance with CEQA Guidelines 15072 & 15073, the District provided notice of and circulated the MND for public review. The Notice of Availability was published in a local newspaper with a general circulation within the District and mailed to residents immediately adjacent to the Oak Ridge property.

The District received three (3) letters of comment which are included in the attached Errata for the Board's review. Of these, one (1) letter was received from the Central Valley Regional Water Quality Control Board, one (1) letter was received from the Sacramento Municipal Utility District, and one (1) letter was received from Civic Thread. None of these letters raised an issue related to the adequacy of the MND under CEQA.

The MND, the Appendices, and the MMRP represents the proposed final environmental document for the Project. The approval of Resolution No. 3335 will approve the MND, and adopt the MMRP which will satisfy the District's obligation under CEQA and is a prerequisite to final District approval of the Project.

Financial Considerations: None.

LCAP Goal(s): Operational Excellence

Documents Attached:

1. Resolution No. 3335
2. Initial Study/Mitigated Negative Declaration for the Nicholas Elementary School Replacement Project and Technical Appendix for MND Link: <https://www.scusd.edu/mnd-oak-ridge-rebuild-project>
3. Mitigation Monitoring and Reporting Program
4. Errata containing public comments and responses

Estimated Time of Presentation: N/A

Submitted by: Nathaniel Browning, Director of Facilities

Approved by: Lisa Allen, Interim Superintendent

**SACRAMENTO CITY UNIFIED SCHOOL DISTRICT
BOARD OF EDUCATION RESOLUTION NO. 3335**

**RESOLUTION OF THE SACRAMENTO CITY UNIFIED SCHOOL DISTRICT
ADOPTING THE MITIGATED NEGATIVE DECLARATION AND APPROVING THE
MITIGATION REPORTING PROGRAM FOR THE OAK RIDGE ELEMENTARY
SCHOOL REBUILD PROJECT**

WHEREAS, the Board of Education (“Board”) of the Sacramento City Unified School District (the "District") has received an initial Study/Mitigated Negative Declaration (“MND”) dated June 2023, prepared for the Oak Ridge Elementary School Rebuild Project (“Project”) in accordance with the California Environmental Quality Act (“CEQA”) (Public Resources Code [PRC] Section 21000 et seq.) and the State CEQA Guidelines (14 California Code of Regulations [CCR] Section 15000 et seq.);

WHEREAS, the Project consists of rebuilding the Oak Ridge Elementary School (“Oak Ridge”) site;

WHEREAS, on the basis of the initial study (“IS”), the District has determined that there will not be significant environmental effects in this case because revisions in the proposed Project, in the form of mitigation measures, were made by the project proponent (the District) prior to the release of the document for public review, and will avoid the effects or mitigate the effects to a less than significant level making the preparation of a MND appropriate;

WHEREAS, on June 16, 2023, the District published the Notice of Availability and Intent to Adopt the MND in The Daily Recorder;

WHEREAS, on June 12, 2023, the District posted the Notice of Availability and Intent to Adopt the MND and the MND in its entirety on the District’s website;

WHEREAS, on June 21, 2023, the District also filed a Notice of Completion with the State Clearinghouse allowing the State to circulate copies of the MND to any affected State agencies for comment;

WHEREAS, the public comment period on the MND commenced on June 21, 2023, and ended on July 20, 2023, following said notice to the public and all public agencies;

WHEREAS, the District received three (3) written comments on the MND from the public and reviewing public agencies during the public review period and any comment that raised an issue related to the adequacy of the environmental document was responded to;

WHEREAS, such comments and responses thereto have been incorporated into the MND through an Errata which contains the summary of comments;

WHEREAS, all actions required to be taken by applicable law relating to the preparation, circulation, and review of the MND have been taken;

WHEREAS, the Board has reviewed and considered the MND (including the Appendices, the Summary of Responses to Comments) and has evaluated and considered the comments received from persons who have reviewed the MND and any written responses thereto;

WHEREAS, the Board has reviewed and considered the mitigation measures identified in the MND and listed in the Mitigation Monitoring and Reporting Program (“MMRP”) set forth in Exhibit A; and

WHEREAS, the facts and findings regarding the Project set forth in this Resolution are supported by substantial evidence in the administrative record and by the MND; and

WHEREAS, the MND has identified all significant environmental effects of the Project and all significant and known potentially significant impacts; and

WHEREAS, the MND has described reasonable mitigation measures that will reduce potentially significant impacts to less than significant; and

WHEREAS, the MND reflects the Board’s independent judgment and analysis on the potential for environmental impacts from the Project.

NOW, THEREFORE, BE IT RESOLVED by the Sacramento City Unified School District Board of Education at the meeting held on August 17, 2023 the following:

SECTION 1: The foregoing recitals are true and correct and made part of this Resolution.

SECTION 2: For every non-exempt public project, the California Environmental Quality Act (“CEQA”) generally requires the lead agency to prepare an initial study in order to determine the level of environmental review required for CEQA compliance. If the initial study indicates that the project will not result in significant adverse environmental impacts, the lead agency may adopt a “negative declaration” (Pub. Res. Code § 21080(c). If the initial study reveals substantial evidence that significant environmental impacts might occur, but also identifies mitigation measures that reduce those impacts to a level of less than significant, the lead agency may satisfy CEQA obligations with a “Mitigated Negative Declaration” (Pub. Res. Code §§ 21064.5 & 21080(d)).

SECTION 3: As set forth in the Recitals, in compliance with CEQA, the District prepared the MND and circulated it for public review.

SECTION 4: The Board hereby certifies that all comments received in response to the MND and responses thereto have been considered by the Board, which comments and responses are included in the Errata. Further, for the purposes of CEQA and the findings set forth herein, the record of proceedings for the District decision on the Project includes, but is not limited to all information in the administrative record including but not limited to the MND, all public notices related to the Project; all comments submitted by any agencies and members of the public; all reports, studies memoranda (excluding confidential memoranda) and other documents relevant to the Project prepared by the District; the District’s consultants, or responsible or trustee agencies with respect to the District compliance with the requirements of CEQA and with respect to the

District's action on the Project; any documentary or other evidence submitted to the District at public meetings or hearings related to the Project; and matters of common knowledge to the District. The materials in the record are located at and available upon request at the District Facilities Office located at 425 1st Avenue in the City of Sacramento.

SECTION 5: The MND for the Project has been completed and is in compliance with the provisions of CEQA, with State and local Guidelines implementing CEQA, and all other applicable laws and regulations.

SECTION 6: In accordance with CEQA, the Board determines that the findings made in the MND with respect to the potential environmental impacts of the Project and the proposed mitigation measures are complete and accurate and hereby incorporates such findings of the MND by reference.

SECTION 7: The Board finds and declares that the MND for the Project was presented to the Board and the Board independently reviewed and considered the information contained in the MND prior to approving the Project, as the Project is defined in the MND.

SECTION 8: Based on its review of the MND, the Board finds that the MND for the Project is an adequate assessment of the potentially significant environmental impacts of the Project, as described in the MND.

SECTION 9: The Board has reviewed the findings of the Project, comments regarding the Project, and other relevant Project records. Based on the evidence contained therein, the Board finds and determines that, following implementation of the mitigation measures set forth in the MND, there is no substantial evidence of a significant, unmitigated environmental impact caused by the Project.

SECTION 10: The Board hereby adopts the Mitigated Negative Declaration as complete and adequate under CEQA, and certifies that the MND represents the independent judgment of the Board.

SECTION 11: The MMRP has been prepared to meet the requirements of Public Resources Code Section 21081.6. This program is designed to ensure compliance with Project changes and mitigation measures imposed to avoid or substantially lessen the significant effects identified in the MND. The Board hereby adopts the Mitigation Reporting Program and incorporates the Mitigation Reporting Program into the Project.

SECTION 12: The MND and the MMRP are on file and available at the Facilities Office for the Sacramento City Unified School District. The custodian of the documents and records referred to herein shall be the Director of Capital Projects, Facilities, and Resource Management, Facility Support Services and shall be located at 425 1st Avenue, Sacramento, CA.

SECTION 13. The Board approves the Project as specifically described in the Final MND.

SECTION 14. The Board directs the Superintendent and/or his/her designee to take any and all required or appropriate actions necessary to proceed with the Project.

SECTION 15. This Resolution shall take effect immediately upon its adoption.

PASSED AND ADOPTED by the Sacramento City Unified School District Board of Education on this date August 17, 2023, by the following vote:

AYES:

NOES:

ABSTAIN:

ABSENT:

ATTESTED TO:

Chinua Rhodes
President of the Board of Education

Lisa Allen
Interim Superintendent

August 2023 | Mitigation Monitoring and Reporting Program
State Clearinghouse No. 2023060577

OAK RIDGE ELEMENTARY SCHOOL REBUILD PROJECT

Sacramento City Unified School District

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MITIGATION MONITORING AND REPORTING PROGRAM

Oak Ridge Elementary School Rebuild Project

CEQA ACTION. Mitigated Negative Declaration (MND)

PROJECT LOCATION: The 7.77-acre site encompasses the Oak Ridge Elementary School property at 4501 Martin Luther King Jr. Boulevard in the City of Sacramento. The Assessor's Parcel Number (APN) for Oak Ridge Elementary School is 020-0220-004.

PROJECT DESCRIPTION: The Sacramento City Unified School District (District) plans fully redesign and reconstruct Oak Ridge Elementary School on its existing site. The capacity of the proposed new school would be 650 students and access to the site would be via Martin Luther King Jr. Boulevard on the southwest corner of the site and a second access point on Mendocino Boulevard would allow access for emergency vehicles and pedestrians.

The District seeks to submit plans to California Division of the State Architect (DSA) in February, 2023 for the demolition and site work portions of the project and October, 2023 for the buildings/final site development work. Construction is estimated to start in approximately September 2023 and construction activities would end in approximately September 2025.

Terms and Definitions

- 1. Property Owner:** Sacramento City Unified School District
- 2. Timing:** This is the point where a mitigation measure must be monitored for compliance. When multiple action items are indicated, it is the first point where compliance associated with the mitigation measure must be monitored.
- 3. Responsibility for Monitoring:** Shall mean that compliance with the mitigation measures shall be reviewed and determined adequate by all parties listed in the table for each mitigation measure. Outside public agency review is limited to those public agencies specified in the Mitigation Monitoring and Reporting Program which have permit authority in conjunction with the mitigation measure.
- 4. Ongoing Mitigation Measures:** The mitigation measures that are designated to occur on an "ongoing basis" as part of this Mitigation Monitoring and Reporting Program will be monitored in the form of an annual letter from the District or contractor in January of each year demonstrating how compliance with the measures has been achieved. When compliance with a measure has been demonstrated for a period of one year, monitoring of the measure will be deemed to be satisfied and no further monitoring will occur. For measures that are to be monitored "Ongoing During Construction," the annual letter will review those measures only while construction is occurring; monitoring will be discontinued after construction is complete. A final letter will be provided at the close of construction.

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Responsibility for Implementation	Implementation Phase	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
AIR QUALITY				
<p>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:</p> <ul style="list-style-type: none"> • Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads. • Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered. • Use wet power vacuum street sweepers to remove any visible trackout mud or dirt onto adjacent public roads at least once a day. Use of dry power sweeping is prohibited. • Limit vehicle speeds on unpaved roads to 15 miles per hour (mph). • All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used. • Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [California Code of Regulations, Title 13, sections 2449(d)(3) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site. • Provide current certificate(s) of compliance for CARB's In-Use Off-Road Diesel-Fueled Fleets Regulation [California Code of Regulations, Title 13, sections 2449 and 2449.1]. • Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated. 	Sacramento City Unified School District	During Construction Activities	District Staff, Construction Contractor	
<p>AQ-2 Construction contractors shall, at minimum, use equipment that meet the United States Environmental Protection Agency's (EPA) Tier 4 Interim emissions standards for off-road diesel-powered construction equipment of 50 horsepower, unless it can be demonstrated to the Sacramento Unified School District that such equipment is not commercially available. For purposes of this mitigation measure, "commercially available" shall mean the availability of Tier 4 Interim engines similar to the availability for other large-scale construction projects in the city occurring at the same time and taking into consideration factors such as (i) potential significant delays to critical-path timing of construction and (ii) geographic proximity to the project site of Tier 4 Interim equipment. Where such</p>	Sacramento City Unified School District	During Construction Activities	District Staff, Construction Contractor	

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Responsibility for Implementation	Implementation Phase	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>equipment is not commercially available, as demonstrated by the construction contractor, Tier 3 equipment retrofitted with a California Air Resources Board's Level 3 Verified Diesel Emissions Control Strategy (VDECS) shall be used. This requirement shall apply to all activities (e.g., foundation, pile driving, vertical construction) related to construction of the proposed project.</p> <p>In addition, the following shall also be completed:</p> <ul style="list-style-type: none"> • Prior to construction, the project engineer shall ensure that all construction (e.g., grading and building) plans clearly show the requirement for EPA Tier 4 Interim emissions standards for construction equipment of 50 horsepower or more. • The construction equipment list shall state the makes, models, Equipment Identification Numbers, Engine Family Numbers, and number of construction equipment on-site. Equipment shall be properly serviced and maintained in accordance with the manufacturer's recommendations. • To the extent that equipment is available and cost-effective, contractors shall use electric, hybrid, or alternate-fueled off-road construction equipment. • Contractors shall use electric construction tools, such as saws, drills, and compressors, where grid electricity is available. • Construction contractors shall ensure that all nonessential idling of construction equipment is restricted to five minutes or less in compliance with Section 2449 of the California Code of Regulations, Title 13, Article 4.8, Chapter 9. 				
BIOLOGICAL RESOURCES				
<p>BIO-1 During construction activities, the following standards shall be required to preserve the trees located on surrounding private properties (i.e., tag numbers 21, 33, 34, 35, 36, 37, 46, and 47):</p> <ul style="list-style-type: none"> • Avoid grade cuts greater than 1 foot within the driplines of preserved trees and within 5 feet of their trunks. • Avoid fill greater than 1 foot within the driplines of preserved trees and any placement of fill within 5 feet of their trunks. • Avoid trenching within the driplines of preserved trees. If it is absolutely necessary to install underground utilities within the driplines of a preserved tree, it is recommended that the trench be either bored or drilled. • Avoid installing irrigation systems within the driplines of preserved tree(s) as it may be detrimental to the long-term survival of the preserved tree(s). • Limit landscaping beneath preserved trees be limited to non-plant materials such as boulders, cobbles, wood chips, etc., or plant species tolerant of the natural semi-arid environs of the trees. 	Sacramento City Unified School District	During Construction Activities	District Staff, Construction Contractor	

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Responsibility for Implementation	Implementation Phase	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<ul style="list-style-type: none"> Drip irrigation should be limited to approximately twice per summer for the understory plants. 				
<p>BIO-2 For grading activities that would occur below the driplines of trees located in the surrounding private properties (i.e., tag numbers 21, 33, 34, 35, 36, 37, 46, and 47), the following standards shall be required to avoid damage to the applicable trees:</p> <ul style="list-style-type: none"> Major roots 2 inches or greater in diameter encountered within the tree's dripline in the course of excavation from beneath trees that are not to be removed should be kept moist and covered with earth as soon as feasible. Roots 1 inch to 2 inches in diameter that are severed should be trimmed, treated with pruning compound, and covered with earth as soon as possible. Support roots that are inside the dripline of the tree should be protected to the extent feasible. Hand-digging is recommended in the vicinity of major trees to prevent root cutting and mangling by heavy equipment. 	Sacramento City Unified School District	During Grading Activities	District Staff, Construction Contractor	
CULTURAL RESOURCES				
<p>CUL-1 Prior to grading activities, a qualified archaeological monitor shall be identified to be on call during ground-disturbing activities. If archeological resources are discovered during excavation and/or construction activities, construction shall stop within 100 feet of the find, and the qualified archaeologist shall be consulted to determine whether the resource requires further study. The archaeologist shall make recommendations to the District to protect the discovered resources.</p> <p>If the resources are deemed to be non-tribal, the archaeological resources recovered shall be provided to the North Central Information Center and California State University, Sacramento Natural History Museums, or any other local museum or repository willing and able to accept and house the resource to preserve for future scientific study.</p> <p>If the resources are deemed to be tribal-related, the Wilton Rancheria will be contacted to assess the significance of any find as well, in order to obtain recommendations on how best to proceed. Tribal-related archaeological resources discovered will be left in place in order to minimize handling until consultation with the qualified archaeological monitor and the Wilton Rancheria can be arranged in order to determine the appropriate next steps. Continued work in the area of the archaeological find will only proceed after authorization from the District in coordination with the Wilton Rancheria and the qualified archaeological monitor. The preferred contact for the Wilton Rancheria contact information is as follows:</p> <p>Wilton Rancheria – Cultural Preservation Department Tel: 916.683.6000</p>	Sacramento City Unified School District	Prior to Grading Activities	District Staff with Qualified Archaeologist, Wilton Rancheria Tribal Monitor, if Warranted	

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures		Responsibility for Implementation	Implementation Phase	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
cpd@wiltonrancheria-nsn.gov					
GEOLOGY AND SOILS					
GEO-1	Prior to construction, the District shall identify a qualified paleontologist to be on-call. If unique paleontological resources are discovered during excavation and/or construction activities, construction shall stop within 50 feet of the find, and the qualified paleontologist shall be consulted to determine whether the resource requires further study. The paleontologist shall make recommendations to the District to protect the discovered resources. Any paleontological resources recovered shall be provided to the North Central Information Center and California State University, Sacramento Natural History Museums, or repository willing and able to accept and house the resource to preserve for future scientific study.	Sacramento City Unified School District	During Construction Activities	District Staff with Qualified Paleontologist, if Warranted	
GREENHOUSE GAS EMISSIONS					
GHG-1	The project shall comply with the applicable 2022 California Green Building Standards Code (CALGreen) Tier 2 standards which are a requirement under the Sacramento Metropolitan Air Quality Management District (SMAQMD) Greenhouse Gas (GHG) Best Management Practices (BMPs). Plans shall identify the number of EV parking spaces with chargers that meet the 2022 CALGreen Tier 2 standards.	Sacramento City Unified School District	During Design Phase	District Staff, Construction Contractor	
NOISE					
N-1	The Sacramento Unified School District shall adopt a Construction Noise Control Plan, including, but not be limited to the following: <ul style="list-style-type: none"> Limit construction to the hours that are allowed by Sacramento County, per Section 6.68.090 of the County Municipal Code. At least 30 days prior to the start of construction activities, all off-site businesses and residents within 300 feet of the project site shall be notified of the planned construction activities. The notification shall include a brief description of the project, the activities that would occur, the hours when construction would occur, and the construction period's overall duration. The notification shall include the telephone numbers of the Sacramento Unified School District's and contractor's authorized representatives that are assigned to respond in the event of a noise or vibration complaint. At least 10 days prior to the start of construction activities, a sign shall be posted at the entrance(s) to the job site, clearly visible to the public, that includes permitted construction days and hours, as well as the Sacramento Unified School District Facility Department's project hotline number and contractor's authorized representatives contact information that are assigned to respond in the event of a noise or vibration complaint. If the authorized contractor's representative receives a complaint, he/she shall 	Sacramento City Unified School District	Prior to Construction Activities	District Staff, Construction Contractor	

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Responsibility for Implementation	Implementation Phase	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>investigate, take appropriate corrective action, and report the action to the Sacramento Unified School District.</p> <ul style="list-style-type: none"> • During the entire active construction period, equipment and trucks used for project construction shall utilize the best available noise control techniques (e.g., improved mufflers, equipment re-design, use of intake silencers, ducts, engine enclosures, and acoustically attenuating shields or shrouds). • Require the contractor to use impact tools (e.g., jack hammers and hoe rams) that are hydraulically or electrically powered wherever possible. Where the use of pneumatic tools is unavoidable, an exhaust muffler on the compressed air exhaust shall be used along with external noise jackets on the tools. • During the entire active construction period, stationary noise sources shall be located as far from sensitive receptors as possible, and they shall be muffled. • During the entire active construction period, noisy operations shall be combined so that they occur in the same time period as the total noise level produced would not be significantly greater than the level produced if the operations were performed separately (and the noise would be of shorter duration). • Select haul routes that avoid the greatest amount of sensitive use areas. • Signs shall be posted at the job site entrance(s), within the on-site construction zones, and along queueing lanes (if any) to reinforce the prohibition of unnecessary engine idling. All other equipment shall be turned off if not in use for more than 5 minutes. • During the entire active construction period and to the extent feasible, the use of noise-producing signals, including horns, whistles, alarms, and bells, shall be for safety warning purposes only. The construction manager shall use smart back-up alarms, which automatically adjust the alarm level based on the background noise level or switch off back-up alarms and replace with human spotters in compliance with all safety requirements and laws. • Implementation of a temporary sound barrier along the southern project site boundary adjacent to the single-family residences which would be required to achieve at least a direct line of sight reduction of 10 dBA and is at least 10 feet high. 				
<p>N-2 The Sacramento Unified School District shall ensure the following occur during construction activities:</p> <ul style="list-style-type: none"> • Vibratory compaction that is within 55 to 140 feet of any surrounding residential structure shall use a static roller in lieu of a vibratory roller. At a distance greater than 25 feet, a vibratory roller would no longer exceed 0.20 in/sec PPV but would exceed 72 VdB. Therefore, a static roller shall be used 	Sacramento City Unified School District	During Construction Activities	District Staff, Construction Contractor	

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Responsibility for Implementation	Implementation Phase	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>within 55 to 140 feet where levels would be reduced to 72 VdB or less and mitigate both vibration damage and vibration annoyance impacts.</p> <ul style="list-style-type: none"> • Paving activities within 55 feet of a residential structure will employ self-compacting pea gravel for the base and a concrete finish as to not require vibratory compaction or use of a static roller. • Grading and earthwork activities within 15 feet of adjacent residential structures shall be conducted with off-road equipment that is limited to 100 horsepower or less. • Relocate loaded trucks as far away as feasibly possible from nearby residences (preferably by 80 feet to reduce below 72 VdB) and reduce vehicle idling to prevent vibration annoyance to nearby residences. • Demolition activities within 80 feet of nearby residences shall be required to use small bulldozers in lieu of large bulldozers in order to reduce vibration annoyance levels below 72 VdB, at distances greater than 80 feet from nearby residences a large bulldozer would no longer exceed 72 VdB and would be permissible under FTA guidelines. • For jackhammer use to the north, closest to the church where the existing parking lot resides; use of a single jackhammer will be permitted only at any time for demolition of pavement. If demolition of pavement is required within 20 feet of the Church alternatives that generate less vibration would be necessary (i.e hand tools or a hydro demolition tractor). At distances from 20 to 35 feet a jackhammer would be allowed to operate but would be restricted to 30 events/uses in a day to fall under the FTA infrequent event criterion for institutional land uses. At distances from 30 to 35 feet a jackhammer would be allowed to operate but would be restricted to 30 to 70 events/uses in a day to fall under the FTA occasional event criterion for institutional land uses. At distances greater than 35 feet, impacts from a jackhammer would be less than significant and no restriction would apply. 				
TRIBAL CULTURAL RESOURCES				
<p>TCR-1 Prior to any ground disturbing construction activities, a Wilton Rancheria Native American monitor shall be identified to be on call.</p> <p>Upon discovery of any tribal cultural resources, construction activities shall cease within 100 feet of the find until the tribal monitor can assess the find and provide recommendations. The evaluation of all tribal cultural resources unearthed by project construction activities shall be evaluated by tribal monitor. If the resources are Native American in origin, the tribal monitor shall coordinate with the District regarding treatment of these resources as well as notifying local tribes of the find. Typically, the tribe(s) will request reburial, preservation in place within the landscapes, the minimization of handling of the objects, construction monitoring of any further activities, or returning objects to a location within the project area</p>	Sacramento City Unified School District	Prior to Ground-Disturbing Activities	District staff with a Wilton Rancheria Tribal Monitor	

Table 1. Mitigation Monitoring and Reporting Program

Mitigation Measures	Responsibility for Implementation	Implementation Phase	Responsibility for Monitoring	Monitor (Signature Required) (Date of Compliance)
<p>where they will not be subject to future impacts. The District may continue work on other parts of the project site while evaluation and, if necessary, mitigation takes place (CEQA Guidelines Section 15064.5[f]). Work in the area(s) of the cultural find may only proceed after all necessary investigation and evaluation of the discovery under the requirements of CEQA, including AB 52, have been satisfied, as well as with authorization from the District in coordination with the Tribe. If the tribal monitor determines a resource to constitute a "historical resource" or "unique archaeological resource," time and funding sufficient to allow for implementation of avoidance measures or appropriate mitigation must be available. The treatment plan established for the resources shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and Public Resources Code Section 21083.2(b) for unique archaeological resources.</p> <p>The project contractor shall implement any measures deemed by the District to be necessary and feasible to preserve in place, avoid, or minimize impacts to the resource, including but not limited to, facilitating the appropriate tribal treatment of the find, as necessary. Treatment that preserves or restores the cultural character and integrity of a tribal cultural resource may include tribal monitoring, culturally appropriate recovery of cultural objects, and reburial of cultural objects or cultural soil.</p> <p>If preservation in place is not feasible, treatment may include implementation of archaeological data recovery excavations to remove the resource along with subsequent laboratory processing and analysis for curation, only if specifically requested by the Tribe. The District shall be responsible for ensuring that a public, nonprofit institution with a research interest in the materials, such as the North Central Information Center and California State University, Sacramento Natural History Museums, curate any historic archaeological material that is not Native American in origin if such an institution agrees to accept the material. If no institution accepts the archaeological material, the District shall offer it to a local historical society for educational purposes or retain the material and use it for educational purposes. The Wilton Rancheria contact information is as follows:</p> <p style="padding-left: 40px;">Wilton Rancheria – Cultural Preservation Department Tel: 916.683.6000 cpd@wiltonrancheria-nsn.gov</p>				

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August 2023 | **Errata**
State Clearinghouse No. 2023060577

OAK RIDGE ELEMENTARY SCHOOL REBUILD PROJECT

Sacramento City Unified School District

Prepared for:

Sacramento City Unified School District
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Table of Contents

SECTION	PAGE
1. INTRODUCTION.....	1
1.1 BACKGROUND.....	1
1.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES	1
2. RESPONSE TO COMMENTS	3
3. REVISIONS TO THE IS/MND.....	21
3.1 REVISIONS IN RESPONSE TO WRITTEN COMMENTS	21

Table of Contents

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1. Introduction

1.1 BACKGROUND

This document includes a compilation of the public comments received on the Oak Ridge Elementary School Rebuild Project Initial Study and Mitigated Negative Declaration (collectively, IS/MND; State Clearinghouse No. 2023060577) and the Sacramento City Unified School District's (District's) responses to those comments.

Under the California Environmental Quality Act (CEQA), a lead agency is not required to prepare formal responses to comments on an IS/MND. However, CEQA requires the District to have adequate information on the record explaining why the comments do not affect the conclusion of the IS/MND that there are no potentially significant environmental effects. In the spirit of public disclosure and engagement, the District, as the lead agency, has responded to all written comments submitted on the IS/MND during the 30-day public review period, which began June 21, 2023, and ended June 20, 2023.

1.2 CEQA REQUIREMENTS REGARDING COMMENTS AND RESPONSES

CEQA Guidelines, Section 15204(b), outlines parameters for submitting comments on negative declarations, and reminds persons and public agencies that the focus of review and comment of IS/MNDs should be on the proposed findings that the project will not have a significant effect on the environment. If the commenter believes that the project may have a significant effect, they should: (1) Identify the specific effect, (2) Explain why they believe the effect would occur, and (3) Explain why they believe the effect would be significant.

CEQA Guidelines, Section 15204(c), further advises, "Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence."

Section 15204(d) also states, "Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency's statutory responsibility." Section 15204 (e) states, "This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section."

Finally, CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or demanded by commenters. When responding to comments, lead agencies need only respond to potentially significant environmental issues and do not need to provide all information requested by reviewers, as long as a good-faith effort at full disclosure is made in the environmental document.

1. Introduction

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2. Response to Comments

This section provides all written comments received on the circulated IS/MND and the District's response to each comment.

Comment letters and specific comments within those letters are assigned an alphanumeric designation for reference purposes. Where sections of the IS/MND are excerpted in this document, they are indented. The following is a list of all comment letters received on the circulated IS/MND during the 30-day public review period, which began June 21, 2023, and ended July 20, 2023.

Letter Reference	Commenting Person/Agency	Date of Comment	Page No.
Agencies			
A	Central Valley Regional Water Quality Control Board, Peter Minkel, Engineering Geologist	July 14, 2023	4
B	Sacramento Municipal Utility District, Rob Ferrera, Environmental Services Specialist	July 19, 2023	12
C	Civic Thread, Jordan Grimaldi, Safe Routes to Schools Director	July 20, 2023	16

2. Response to Comments

LETTER A – Central Valley Regional Water Quality Control Board, Peter Minkel, Engineering Geologist (5 pages)



Central Valley Regional Water Quality Control Board

14 July 2023

Nathaniel Browning
Sacramento City Unified School District
425 1st Avenue
Sacramento, CA 95818
Nathaniel-Browning@scusd.edu

Governor's Office of Planning & Research

Jul 17 2023
STATE CLEARINGHOUSE

COMMENTS TO REQUEST FOR REVIEW FOR THE MITIGATED NEGATIVE DECLARATION, OAK RIDGE ELEMENTARY SCHOOL REBUILD PROJECT, SCH#2023060577, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 21 June 2023 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Mitigated Negative Declaration* for the Oak Ridge Elementary School Rebuild Project, located in Sacramento County.

Our agency is delegated with the responsibility of protecting the quality of surface and groundwaters of the state; therefore, our comments will address concerns surrounding those issues.

I. Regulatory Setting

Basin Plan

The Central Valley Water Board is required to formulate and adopt Basin Plans for all areas within the Central Valley region under Section 13240 of the Porter-Cologne Water Quality Control Act. Each Basin Plan must contain water quality objectives to ensure the reasonable protection of beneficial uses, as well as a program of implementation for achieving water quality objectives with the Basin Plans. Federal regulations require each state to adopt water quality standards to protect the public health or welfare, enhance the quality of water and serve the purposes of the Clean Water Act. In California, the beneficial uses, water quality objectives, and the Antidegradation Policy are the State's water quality standards. Water quality standards are also contained in the National Toxics Rule, 40 CFR Section 131.36, and the California Toxics Rule, 40 CFR Section 131.38.

The Basin Plan is subject to modification as necessary, considering applicable laws, policies, technologies, water quality conditions and priorities. The original Basin Plans were adopted in 1975, and have been updated and revised periodically as required, using Basin Plan amendments. Once the Central Valley Water Board has adopted a Basin Plan amendment in noticed public hearings, it must be approved by the State Water Resources Control Board (State Water Board), Office of

A-1

MARK BRADFORD, CHAIR | PATRICK PULUPA, ESQ., EXECUTIVE OFFICER

11020 Sun Center Drive #200, Rancho Cordova, CA 95670 | www.waterboards.ca.gov/centralvalley

2. Response to Comments

Oak Ridge Elementary
School Rebuild Project
Sacramento County

- 2 -

14 July 2023

Administrative Law (OAL) and in some cases, the United States Environmental Protection Agency (USEPA). Basin Plan amendments only become effective after they have been approved by the OAL and in some cases, the USEPA. Every three (3) years, a review of the Basin Plan is completed that assesses the appropriateness of existing standards and evaluates and prioritizes Basin Planning issues. For more information on the *Water Quality Control Plan for the Sacramento and San Joaquin River Basins*, please visit our website:
http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:
https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

Any discharge of waste to high quality waters must apply best practicable treatment or control not only to prevent a condition of pollution or nuisance from occurring, but also to maintain the highest water quality possible consistent with the maximum benefit to the people of the State.

This information must be presented as an analysis of the impacts and potential impacts of the discharge on water quality, as measured by background concentrations and applicable water quality objectives.

The antidegradation analysis is a mandatory element in the National Pollutant Discharge Elimination System and land discharge Waste Discharge Requirements (WDRs) permitting processes. The environmental review document should evaluate potential impacts to both surface and groundwater quality.

II. Permitting Requirements

Construction Storm Water General Permit

Dischargers whose project disturb one or more acres of soil or where projects disturb less than one acre but are part of a larger common plan of development that in total disturbs one or more acres, are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit), Construction General Permit Order No. 2009-0009-DWQ. Construction activity subject to this permit includes clearing, grading, grubbing, disturbances to the ground, such as stockpiling, or excavation, but does not include regular maintenance activities performed to restore the original line, grade, or capacity of the facility. The Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP). For more information on the Construction General Permit, visit the State Water Resources Control Board website at:

A-1
CONT'D

A-2

2. Response to Comments

Oak Ridge Elementary
School Rebuild Project
Sacramento County

- 3 -

14 July 2023

http://www.waterboards.ca.gov/water_issues/programs/stormwater/constpermits.shtml

A-2
CONT'D

Clean Water Act Section 404 Permit

If the project will involve the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be needed from the United States Army Corps of Engineers (USACE). If a Section 404 permit is required by the USACE, the Central Valley Water Board will review the permit application to ensure that discharge will not violate water quality standards. If the project requires surface water drainage realignment, the applicant is advised to contact the Department of Fish and Game for information on Streambed Alteration Permit requirements. If you have any questions regarding the Clean Water Act Section 404 permits, please contact the Regulatory Division of the Sacramento District of USACE at (916) 557-5250.

A-3

Clean Water Act Section 401 Permit – Water Quality Certification

If an USACE permit (e.g., Non-Reporting Nationwide Permit, Nationwide Permit, Letter of Permission, Individual Permit, Regional General Permit, Programmatic General Permit), or any other federal permit (e.g., Section 10 of the Rivers and Harbors Act or Section 9 from the United States Coast Guard), is required for this project due to the disturbance of waters of the United States (such as streams and wetlands), then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities. There are no waivers for 401 Water Quality Certifications. For more information on the Water Quality Certification, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality_certification/

A-4

Waste Discharge Requirements – Discharges to Waters of the State

If USACE determines that only non-jurisdictional waters of the State (i.e., “non-federal” waters of the State) are present in the proposed project area, the proposed project may require a Waste Discharge Requirement (WDR) permit to be issued by Central Valley Water Board. Under the California Porter-Cologne Water Quality Control Act, discharges to all waters of the State, including all wetlands and other waters of the State including, but not limited to, isolated wetlands, are subject to State regulation. For more information on the Waste Discharges to Surface Water NPDES Program and WDR processes, visit the Central Valley Water Board website at: https://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_surface_water/

A-5

Projects involving excavation or fill activities impacting less than 0.2 acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters of the state may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ (General Order 2004-0004). For more information on the General Order 2004-0004, visit the State Water Resources Control Board website at:

2. Response to Comments

Oak Ridge Elementary
School Rebuild Project
Sacramento County

- 4 -

14 July 2023

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wgo/wgo2004-0004.pdf

A-5
CONT'D

Dewatering Permit

If the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Valley Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085. Small temporary construction dewatering projects are projects that discharge groundwater to land from excavation activities or dewatering of underground utility vaults. Dischargers seeking coverage under the General Order or Waiver must file a Notice of Intent with the Central Valley Water Board prior to beginning discharge.

A-6

For more information regarding the Low Threat General Order and the application process, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wgo/wgo2003-0003.pdf

For more information regarding the Low Threat Waiver and the application process, visit the Central Valley Water Board website at:

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/waivers/r5-2018-0085.pdf

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. Dewatering discharges are typically considered a low or limited threat to water quality and may be covered under the General Order for *Limited Threat Discharges to Surface Water* (Limited Threat General Order). A complete Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order. For more information regarding the Limited Threat General Order and the application process, visit the Central Valley Water Board website at:

A-7

https://www.waterboards.ca.gov/centralvalley/board_decisions/adopted_orders/general_orders/r5-2016-0076-01.pdf

NPDES Permit

If the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, the proposed project will require coverage under a National Pollutant Discharge Elimination System (NPDES) permit. A complete Report of Waste Discharge must be submitted with the Central Valley Water Board to obtain a NPDES Permit. For more information regarding the NPDES Permit and the application process, visit the Central Valley Water Board website at: <https://www.waterboards.ca.gov/centralvalley/help/permit/>

A-8

2. Response to Comments

Oak Ridge Elementary
School Rebuild Project
Sacramento County

- 5 -

14 July 2023

If you have questions regarding these comments, please contact me at (916) 464-4684
or Peter.Minkel2@waterboards.ca.gov.

A-8
CONT'D

Peter Minkel

Peter Minkel
Engineering Geologist

cc: State Clearinghouse unit, Governor's Office of Planning and Research,
Sacramento

2. Response to Comments

A. **Response to Comments from Central Valley Regional Water Quality Control Board, Peter Minkel, Engineering Geologist, dated July 14, 2023.**

A-1 The commenter provides background information on the Basin Plan and the Antidegradation policy contained in the Basin Plan.

As indicated in the IS/MND, all construction activities is required to comply with the National Pollutant Discharge Elimination System (NPDES) program, which regulates pollutant discharges. The proposed project will also implement best management practices (BMPs) to control erosion and prevent any discharge of sediments from the site. As the antidegradation analysis is a mandatory element in the NPDES, this analysis will be conducted at the time the NPDES is prepared. As indicated in Section 3.10(a), of the IS/MND, the proposed project will result in a less than significant impact in regard to surface and ground water quality.

A-2 The commenter states that dischargers whose project disturb one or more acres of soil are required to obtain coverage under the General Permit for Storm Water Discharges Associated with Construction and Land Disturbance Activities (Construction General Permit). The commenter states that the Construction General Permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP).

As the proposed project would disturb more than one acre of land, the proposed project is required to be constructed in accordance with the SWPPP which includes BMPs to reduce or eliminate pollutants in stormwater discharges, as indicated in Section 3.9(b) of the IS/MND.

A-3 The commenter states that if the project involves the discharge of dredged or fill material in navigable waters or wetlands, a permit pursuant to Section 404 of the Clean Water Act may be required.

As indicated in Section 3.4(c) of the IS/MND, there are no wetlands onsite. The project site is currently developed with the existing Oak Ridge Elementary School and is located in an urbanized portion of the County. The proposed project consists of rebuilding the elementary school. As the proposed project will not involve the discharge of fill material in navigable waters or wetlands, the proposed project is not subject to the requirements of the 404 Permit.

A-4 The commenter states that if a United States Army Corps of Engineers (USACE) permit, or any other federal permit, is required for the proposed project due to disturbance of waters of the United States, then a Water Quality Certification must be obtained from the Central Valley Water Board prior to initiation of project activities.

2. Response to Comments

The proposed project will not discharge surface waters to a stream or creek or other waters of the State. All surface water not collected and retained onsite in accordance with State and local regulations will be collected and discharged into a Municipal drainage system operated by the Sacramento Area Sewer District. Therefore, the proposed project is not subject to a federal 401 Permit.

- A-5 The commenter states that if USACE determined that only non-jurisdictional waters of the State are present onsite, the proposed project may require a Waste Discharge Requirement permit to be issued by the Central Valley Water Board. The commenter states for projects involving excavation or fill activities impacting less than 0.2-acre or 400 linear feet of non-jurisdictional waters of the state and projects involving dredging activities impacting less than 50 cubic yards of non-jurisdictional waters may be eligible for coverage under the State Water Resources Control Board Water Quality Order No. 2004-0004-DWQ.

The proposed project will not discharge surface waters to non-jurisdictional waters. All surface waters not collected and retained onsite in accordance with State and local regulations, will be collected and discharged into a Municipal drainage system operated by the Sacramento Area Sewer District. Therefore, the proposed project is not subject to the waste discharge requirements and permit.

- A-6 The commenter states that if the proposed project includes construction or groundwater dewatering to be discharged to land, the proponent may apply for coverage under State Water Board General Water Quality Order (Low Threat General Order) 2003-0003 or the Central Water Board's Waiver of Report of Waste Discharge and Waste Discharge Requirements (Low Threat Waiver) R5-2018-0085.

Dewatering is not anticipated for the proposed project as the seasonal high groundwater elevation is estimated to be at least 20 feet below grade and no excavations are planned anywhere near that depth by the proposed project. The project site is currently developed with the existing Oak Ridge Elementary and is located in an urbanized portion of Sacramento. The proposed project consists of rebuilding the elementary school. However, if dewatering activities are needed to construct the proposed project, the District will apply for all applicable permits.

- A-7 The commenter states that if the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will require coverage under a NPDES permit, and a Notice of Intent must be submitted to the Central Valley Water Board to obtain coverage under the Limited Threat General Order.

See response to comment A-6.

2. Response to Comments

A-8 The commenter states that if the proposed project discharges waste that could affect the quality of surface waters of the State, other than into a community sewer system, then a NPDES permit is required, and a Report of Waste Discharge must be submitted to the Central Valley Water Board to obtain a NPDES permit.

The proposed project will not discharge waste that could affect the quality of surface waters. All waste is discharged into a community (Municipal) sewage system operated by the Sacramento Area Sewer District. Therefore, coverage under the NPDES permit would not apply.

2. Response to Comments

LETTER B – Sacramento Municipal Utility District, Rob Ferrera, Environmental Services Specialist (2 pages)



Sent Via E-Mail

July 19, 2023

Nathaniel Browning, Facilities Director
Facilities Support Services
425 1st Avenue, Sacramento, CA 95818
Nathaniel-Browning@scusd.edu

Subject: **Oak Ridge Elementary School Rebuild Project / MND / 20230605771**

Dear Mr. Browning:

The Sacramento Municipal Utility District (SMUD) appreciates the opportunity to provide comments on the Mitigated Negative Declaration (MND) for the Oak Ridge Elementary School Rebuild Project (Project, SCH 2023060577).

As a Responsible Agency, SMUD's review of projects include supporting the goals of our 2030 Zero Carbon Plan. This plan is a flexible road map to eliminate greenhouse gas emissions from our electricity production by 2030, which is the most ambitious goal of any large utility in the United States, while maintaining reliable and affordable service. This ambitious goal puts the Sacramento region on the map as an example to follow and a region where innovative, climate-friendly businesses want to be. As a community-owned, not-for-profit utility, our customers and community are at the heart of all we do. By pursuing zero carbon, we're helping create a cleaner and healthier region for all.

B-1

It is our desire that the Project will acknowledge any impacts related to the following:

- Overhead and or underground transmission and distribution line easements. Please view the following links on smud.org for more information regarding transmission encroachment:
 - <https://www.smud.org/en/Business-Solutions-and-Rebates/Design-and-Construction-Services>
 - <https://www.smud.org/en/Corporate/Do-Business-with-SMUD/Land-Use/Transmission-Right-of-Way>
- Utility line routing
- Electrical load needs/requirements
- Energy Efficiency
- Climate Change
- Cumulative impacts related to the need for increased electrical delivery
- The potential need to relocate and or remove any SMUD infrastructure that may be affected in or around the project area

B-2

B-3

B-4

B-5

2. Response to Comments

More specifically, SMUD would like to have the following details related to the electrical infrastructure considered in the utilities section analysis:

Existing Facilities and Service Arrangements:

- SMUD has an existing overhead (OH) 21 kV circuit along the northern side of the school property. This existing OH line serves both the Oak Ridge Elementary school and church directly north of the Oak Ridge Elementary School.
- SMUD has an existing OH 21 kV circuit along the southern side of the school property.
- SMUD has an existing underground (UG) 21 kV circuit and transformer within the property. This transformer is the current service to Oak Ridge Elementary.

B-6

Estimated Proposed Facilities and/or Impacts:

- SMUD may require additional OH and/or UG circuits to feed any new service required of this rebuild.
- SMUD may also require transformer and switch space on the premises, the size and disposition of which will be dependent on the desired service size for the new school.
- The location of these new or additional facilities will be dependent on the desired service location, assuming it is different from the existing location.

SMUD would like to be involved with discussing the above areas of interest as well as discussing any other potential issues. We aim to be partners in the efficient and sustainable delivery of the proposed Project. Please ensure that the information included in this response is conveyed to the Project planners and the appropriate Project proponents.

B-7

Environmental leadership is a core value of SMUD, and we look forward to collaborating with you on this Project. Again, we appreciate the opportunity to provide input on this Project. If you have any questions regarding this letter, please do not hesitate to contact me at 916.732.6676, or by email at rob.ferrera@smud.org.

Sincerely,



Rob Ferrera
Environmental Services Specialist
Sacramento Municipal Utility District
6201 S Street
Sacramento, CA 95817

cc: Entitlements

2. Response to Comments

B. Response to Comments from Sacramento Municipal Utility District, Rob Ferrera, Environmental Services Specialist, dated July 19, 2023.

B-1 The commenter acknowledges Sacramento Municipal Utilities District’s (SMUD) review of the Mitigated Negative Declaration and briefly summarizes the agency’s vision and responsibility to its customers.

This comment does not address the adequacy of the MND; therefore, no further response is required.

B-2 The commenter asks the proposed project to acknowledge impacts related to overhead and underground transmission and distribution line easements and utility line routing.

As noted in Section 3.6(a) of the IS/MND, SMUD would provide electrical service to the site through connections to existing electrical lines and new on-site infrastructure as needed. The impacts regarding this infrastructure have been analyzed as part of the proposed project in this IS/MND and impacts have been determined to be less than significant.

B-3 The commenter asks the proposed project to acknowledge impacts related to electrical load needs/requirements.

The proposed project involves the rebuild of an existing elementary school. As discussed in Section 1.5 of the IS/MND, the proposed project would not increase the capacity of the school. While the total square footage of building area onsite would increase, compliance with the latest California Building Energy Efficiency Standards and California Green Building Standards Code (CALGreen) would decrease the per capita energy consumption of the proposed project when compared to the existing school. Impacts regarding operational electricity usage would be less than significant, as discussed in Section 3.6(a).

B-4 The commenter asks the proposed project to acknowledge impacts related to energy efficiency and climate change.

See Comment B-3. The project’s impacts with regard to energy efficiency are discussed throughout Section 3.6. Project impacts with regard to climate change are discussed in Section 3.8. Energy efficiency and climate change mitigation measures associated with the proposed project include its All-Electric building design, compliance with CALGreen and the California Energy Code, adherence to the Sacramento Metropolitan Air Quality Management District’s (SMAQMD’s) Tier 1 best management practices, and other requirements and provisions of the State law that would reduce greenhouse gas emissions.

B-5 The commenter asks the proposed project to acknowledge cumulative impacts related to the need for increased electrical delivery and need to relocate and or remove any SMUD infrastructure that may be affected in or around the project area.

2. Response to Comments

See Comment B-3. The proposed project would not place substantial new demands on the energy transmission system; therefore, the project would not result in a cumulatively considerable contribution to the energy transmission and distribution system in the project area. To address potential impacts with regard to the relocation or removal of SMUD infrastructure, changes have been incorporated into Section 3.19 of the IS/MND as seen in Section 3.1, *Revisions to the IS/MND*.

- B-6 The commenter provides specific information regarding SMUD’s existing facilities and arrangements as well as the expected facility requirements under the proposed project.

This information has been incorporated into the discussion of utility infrastructure impacts in Section 3.19 of the IS/MND, as seen in Section 3.1 of this document. No facilities would be placed outside of the project study area, and therefore, all impacts associated with the placement of such facilities have been adequately described within the IS/MND.

- B-7 The commenter requests collaboration as project design is advanced and identifies a key staff contact at SMUD for follow up.

The project proponent accepts the benefit for both parties to collaborate going forward. This comment does not otherwise address the adequacy of the IS/MND; therefore, no further response is required.

2. Response to Comments

LETTER C – Civic Thread, Jordan Grimaldi, Safe Routes to Schools Director (4 pages)



July 20, 2023

VIA EMAIL

Nathaniel Browning
Sacramento City Unified School District Facilities Maintenance & Resource Management
425 1st Avenue
Sacramento, CA 95818

RE: Oak Ridge Elementary School Rebuild Project – Mitigated Negative Declaration (MND)

Dear Nathaniel:

Civic Thread (formerly “WALKSacramento”) has recently reviewed the Mitigated Negative Declaration materials for the Oak Ridge Elementary School Rebuild Project and would like to offer the following comments.

Civic Thread supports the proposed plans, designs, and mitigation strategies as outlined in the initial study, particularly as they relate to circulation and transportation elements. As noted in a recent [policy statement](#) from the American Academy of Pediatrics, creating walkable and bikeable communities are just as critical to children’s safety, if not more, than teaching students how to walk and bike safely. Furthermore, as equity is central to Civic Thread’s [mission](#) and one of the Safe Routes Partnership’s “6 E’s,” we support Sacramento City Unified School District (SCUSD) directing investments towards its Title I-designated schools, such as Oak Ridge Elementary. According to the [California Department of Education](#), 95.16% of Oak Ridge students were identified as English Learners and Foster Youth and were eligible for Free/Reduced Price Meals. Oak Ridge Elementary is also situated within Oak Park, a [SB 535 Disadvantaged Community](#).

C-1

The initial plans include several strategies to support safer conditions for students and families opting for active transportation to get to school. First and foremost, decreasing Oak Ridge’s enrollment capacity from 696 students to 650 students will likely work to naturally decrease traffic congestion at/around campus. There are also several preliminary infrastructure designs that support pedestrian and bicyclist safety and circulation:

C-2

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2. Response to Comments

Page 2 of 5

7/20/23

- Reconfiguring the school’s primary ingress to be located at the signalized intersection of 21st Avenue and Martin Luther Kr Jr. (MLK Jr.) Boulevard from its previous location north of the intersection will create more control around a primary crossing for students and families. The Conceptual Site Plan (Figure 5) also notes there will be “upgraded intersection and traffic signal” improvements at this location.
- Connecting new internal/external sidewalks with existing sidewalks will support a safe, connected pedestrian network – of particular importance for young pedestrians.
- Establishing a secondary entrance for bus/emergency vehicle/pedestrian-only use, coupled with reconfiguring the site layout to offset academic buildings, collectively work to increase separation between vehicles and pedestrians. Creating this primary pedestrian entrance at Mendocino Avenue will also likely encourage families to “park-and-walk” from adjacent residential streets, which will reduce congestion in the main pick-up/drop-off loop and provide opportunities for students to practice key pedestrian safety skills who are otherwise typically driven to school.

C-2
(CONT'D)

Beyond traffic safety, Civic Thread supports SCUSD’s efforts to promote student and community wellness through a variety of design and policy strategies through the rebuild. With disproportionate rates of reported Adverse Childhood Experiences (ACE) scores for Sacramento children ages 4+ and other concerning trends in youth mental health, as noted in the [2022 Sacramento County Children’s Report Card](#), creating spaces such as the outdoor “chill zone/quiet individual break area” will be key to fostering student wellness. Creating opportunities for community use of field facilities with reservations coordinated through the District’s civic permits office will also serve to promote physical and mental health for the broader community, which is particularly critical in “park poor” neighborhoods such as Oak Park where greenspace access is disproportionately lower.

C-3

As outlined above, the initial study and preliminary designs for Oak Ridge Elementary’s rebuild project offer promising benefits for student health and safety. In order to maximize these perceived outcomes, SCUSD should pursue policy and funding avenues to implement holistic programming, such as [Safe Routes to Schools](#), at Oak Ridge and the broader district. With elementary school-age students (and their caregivers) in particular, creating safe sidewalks and bike lanes alone is not enough to get people out of their cars. **Infrastructure improvements must be coupled with comprehensive,**

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2. Response to Comments

Page 3 of 5

7/20/23

active programming to result in meaningful and lasting behavior change.¹ The more students walk and bike to school, the greater the academic, health, safety, and environmental benefits for the school community and beyond.² At the very least, SCUSD Facilities Services should support Oak Ridge Elementary’s administration with creating and distributing pick-up/drop-off procedures and pedestrian and cyclist safety tips in the school’s primary languages to ensure families are made aware of updated traffic flows and entrances once construction is complete.

C-3
(CONT'D)

Additional recommendations to maximize the preliminary design’s potential to improve safety and health outcomes include:

- **Install high-quality air filtration systems** in all campus buildings. In addition to Oak Park’s SB 535 status, as noted above, an air quality monitor located at MLK Jr. Boulevard and 22nd Avenue (directly across Oak Ridge Elementary) deployed through the [Sacramento Neighborhoods Activating on Air Quality](#) project was found to have the [highest average and median Air Quality Index](#) out of all ten monitors deployed throughout the neighborhood over a one-year data collection period. This is especially concerning given children are listed as a “vulnerable population” to the health effects of air pollution, according to the US EPA.³ Thus, SCUSD should also consider collaborating with the [Sacramento Metropolitan Air Quality Management District](#) to continue monitoring in this area and even explore educational opportunities for students to learn more about air quality, such as the [air monitoring lab](#) at Fern Bacon Middle School.
- **Include skateboard and scooter racks with bicycle parking.** While initial designs site bicycle parking in an effective location east of the bus-only loop, SCUSD should consider installing supplemental facilities, including skateboard and scooter racks, to offer a wider range of secure parking for students and further encourage active school commuting.

C-4

¹ A [2014 study](#) of 801 schools across three US states and the District of Columbia showed an an average 25% increase in walking and bicycling to school over a five-year period associated with education and encouragement programs, while only an 18% increase in walking and bicycling was found to be associated with infrastructure improvements. Thus, the study concludes, programs that incorporate education and encouragement activities *alongside* infrastructure improvements can see increases in walking or biking *of up to 43%*. **This has major implications for advancing student health and sustainability goals included in SCUSD’s [Student Wellness Policy](#) and [Sustainable Schools Initiative](#).**

² Learn more about the benefits of Safe Routes to School [here](#)

³ [“Research on Health Effects from Air Pollution,”](#) US EPA

2. Response to Comments

Page 4 of 5

7/20/23

- **Coordinate closely with City of Sacramento staff on implementation of active transportation improvements at and around Oak Ridge Elementary.** Oak Ridge Elementary was included as one of 20 school sites in the City’s [Vision Zero School Safety Plan](#). Additional opportunities to coordinate with the City include the “[Streets for People: Sacramento Active Transportation Plan](#)” and [General Plan 2040 Update](#). Close coordination with the City, particularly regarding complete streets improvements along MLK Jr Boulevard, will be key as there have been **41 bicycle and pedestrian collisions within a half mile of the school, including one fatality**, since 2015, according to UC Berkeley’s Transportation Injury Mapping System.⁴ Additional recommendations to improve walkability and bikeability at and around Oak Ridge Elementary are outlined in the attached walk audit report prepared by WALKSacramento in January 2019.

C-4
(CONT'D)

In sum, the initial study’s environmental analysis indicates there will be little-to-no detrimental impact resulting from the Oak Ridge Elementary School Rebuild Project and mitigation measures have been established where appropriate. Preliminary plans offer promising opportunities to model walking and biking-friendly schools for SCUSD’s new construction and renovation projects. Such benefits will be maximized if SCUSD partners with local planning and agency staff to go above and beyond on-campus designs to include expanded educational opportunities and community-wide improvements.

C-5

Thank you for the opportunity to provide comments. Should you have any questions on the recommendations made above, please don’t hesitate to reach out to me at jgrimaldi@civicthread.org. Please notify Civic Thread of future routings or notices for this project.

Sincerely,



Jordan Grimaldi
Safe Routes to Schools Director

⁴ <https://tims.berkeley.edu/tools/srts/>, data accessed on 7/19/23

2. Response to Comments

C. **Response to Comments from Civic Thread, Jordan Grimaldi, Safe Routes to Schools Director, dated July 20, 2023.**

C-1 The commenter introduces the goals and mission of the Civic Thread organization and expresses support for investment in Title I schools including Oak Ridge Elementary.

This comment is noted. As this comment does not address the adequacy of the MND, no further response is required.

C-2 The commenter lists various features of the proposed project that would active transportation options and pedestrian/bicycle safety.

This comment is noted. As this comment does not address the adequacy of the MND, no further response is required.

C-3 The commenter expresses support for other aspects of the project’s design and advises the District to pursue policy and funding avenues for programming such as the Safe Routes to School program. The commenter also recommends that the district create and distribute materials detailing the school’s pick-up/drop-off procedures.

These recommendations are noted and will be taken under consideration by the District. As this comment does not address the adequacy of the MND, no further response is required.

C-4 The commenter provides a list of additional recommendations for the District’s consideration including the installation of air filtration systems, skateboard and scooter parking, and coordination with the City of Sacramento regarding transportation improvements in the vicinity of the project site.

These recommendations are noted and will be taken under consideration by the District. As this comment does not address the adequacy of the MND, no further response is required.

C-5 The commenter summarizes the findings of the IS/MND and notes some of the potential benefits of the proposed project. The commenter also provides contact information and invites further collaboration with Civic Threads on facility programming.

The commenter’s contributions will be taken under consideration by the District. As this comment does not address the adequacy of the MND, no further response is required.

2. Response to Comments

3. Revisions to the IS/MND

3.1 REVISIONS IN RESPONSE TO WRITTEN COMMENTS

This section contains revisions to the IS/MND based upon additional or revised information required to prepare a response to a specific comment. Revisions shown herein do not constitute new significant information, as described in CEQA Guidelines Section 15088.5. That is, the revisions do not result in new significant environmental impacts, do not constitute significant new information, and do not alter the conclusions of the environmental analysis. Changes made to the IS/MND are identified here in ~~strikeout~~ text to indicate deletions and in underlined text to signify additions.

Page 106, Section 3.19, Utilities and Service Systems. The following text is amended and added under Impact 3.19(a).

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

Less Than Significant Impact. The proposed project involves the rebuilding of an existing school. The proposed project would result in no change to student capacity. ~~The proposed project would demolish and reconstruct all utilities onsite. Electricity for the existing Oak Ridge Elementary School is provided by the SMUD. The proposed project would tie into existing SMUD utilities located within the project vicinity. SMUD 21 kilovolt (kV) facilities currently exist within and surrounding the project site. The proposed project may require overhead and underground circuits to feed new service in addition to a transformer and switch space on the site. All utility improvements would occur within the footprint proposed project, as analyzed throughout this IS/MND (or the adjacent right-of-way). Therefore, as utilities would not be expanded or relocated,~~ impacts would be less than significant.

2. Response to Comments

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