Environmental Screening and CEQA Determination for Sacramento City Unified School District's 2012 Proposal to Close Freeport Elementary School and Transfer Students to John Still K-8 School and Related Actions

INTRODUCTION

The purpose of this report is to determine the status of the proposed school closures and transfers under the California Environmental Quality Act or CEQA. The CEQA Statutes are included in the California Public Resources Code, Division 13, Environmental Quality. In addition to the CEQA statutes, this review also relies on the guidance of the adopted State CEQA Guidelines which are included in Title 14, Chapter 3 of the California Code of Regulations.

The purpose of CEQA is to identify, disclose and to the extent feasible mitigate any significant physical environmental effects of a proposed project. CEQA focuses on physical environmental effects and does not generally review social or economic effects unless such effects result in a physical environmental impact. Section 21060.5 of the CEQA Statutes defines "Environment" as the "physical conditions which exist within the area which will be affected by a proposed project, including land, air, water, minerals, flora, fauna, noise, objects of historic or aesthetic significance." Thus, for example, the transfer of students from one school to another may result in changes in travel patterns from home to school however, this change would not be considered a significant environmental impact unless it would with reasonably certainty create a significant adverse change in noise, traffic or other physical environmental conditions.

SUMMARY OF THE PROPOSED PROJECT

On November 4, 2010, the Sacramento City Unified School District (SCUSD) Board adopted criteria for school consolidation and closures. These review criteria include:

- **Phase 1 Review Considerations:** School capacity, condition and operating costs.
- **Phase 2 Review Considerations:** School site locational accessibility; enrollment data; facility costs; facility usage/efficiency; facility condition and site data and program data.

Subsequently, the Board appointed a Facility Consolidation and Closure or 7-11 Committee to review data and recommend sites for consolidation and closure. This Committee is governed by Education Code sections 17387-17389 regarding Surplus Property and California Education Code Sections 17387-17391 regarding community involvement by attendance area at the district level regarding surplus space. This community involvement should facilitate making the best possible judgments about the use of excess school facilities in each individual situation. The process would allow community involvement before decisions are made about school closure or the use of surplus space, thus avoiding community conflict and assuring building use that is compatible with the community's needs and desires.

The 7-11 Committee met during the spring and summer of 2011 and had their final meeting on August 29, 2011. The Committee completed the following efforts: (a) Reviewed the school enrollment and other data as provided by the district to determine the amount of surplus space and real property (b) Reviewed non-K-12 sites to determine the amount of surplus space and real property (c) Developed a priority list of surplus real property (d) Provided an advisory report recommending closure and/or consolidation of surplus real property.

The 7-11 Committee recommendations were brought to the Board on October 6, 2011.[1] The Board directed the Superintendent to bring a staff analysis of the 7-11 Committee recommendations and his own recommendations with analysis to the Board for consideration. On November 3, 2011, the Board received the "School Closure and Consolidation Recommendations: Options and Opportunities" report[2] which outlined both the 7-11 Committee's recommendations and the Superintendent's recommendations. At that meeting the Board considered several proposed options, among them was the proposal to close Freeport Elementary School and transfer students to the John Still Elementary School located approximately 0.5 miles to the south of the Freeport site. The John Still school site consists of two contiguous schools, John Still Elementary School and John Still Middle School. To accommodate new students and provide more flexibility in the use of space it was further recommended that John Still Elementary and John Still Middle School be consolidated into a K-8 school.

The District held four community meetings on the proposed school consolidation recommendations, among these, a meeting was held at Freeport Elementary School on Tuesday, November 29, 2011, at 6:30 p.m. to hear views of parents, students, staff and the public.

DESCRIPTION OF THE PROPOSED PROJECT

This Initial Study covers the following proposed actions which were recommended both by the 7-11 Committee and the Superintendent in the November 3, 2011, report to the Board entitled *"School Closure and Consolidation Recommendations: Options and Opportunities*":

Freeport Elementary School (Closure). Close facility and reassign students to John Still. Applications from Freeport students to attend other schools will be given priority during the district's Open Enrollment period. John Still Elementary/Middle recommendation below is necessary to accommodate Freeport closure. All three schools are located in the Meadowview area of South Sacramento and are located to the south of Meadowview Road. (See Figure 1).

John Still Elementary/John Still Middle (Consolidation). It is further recommended that John Still Elementary and John Still Middle school be combined into one K-8 with one administration and support staff. This action is also necessary in order to receive students from Freeport Elementary School which is recommended for closure above. As noted above, this school site is located in the Meadowview area of South Sacramento. (See Figure 1).

[1] "Facility Consolidation and Re-use Advisory Committee Report" August 29, 2011, available at: http://www.scusd.edu/BoardofEducation/Meetings/Documents/20111006/item%2010.7.pdf

[2] "School Closure and Consolidation Recommendations: Options and Opportunities" November 3, 2011, available at: http://www.scusd.edu/BoardofEducation/Meetings/Documents/20111103/November%203%20Meeting%20(2).pdf

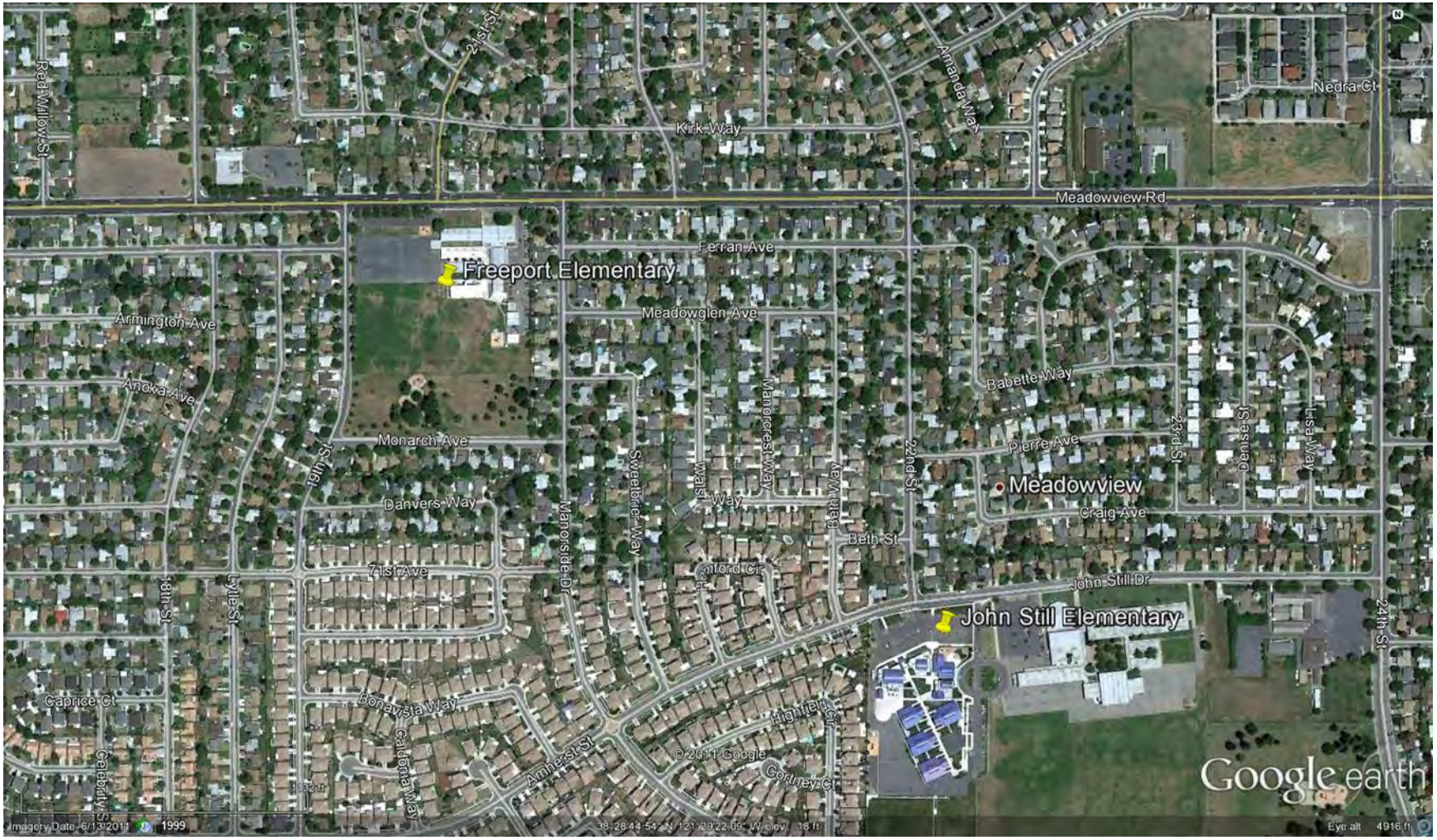
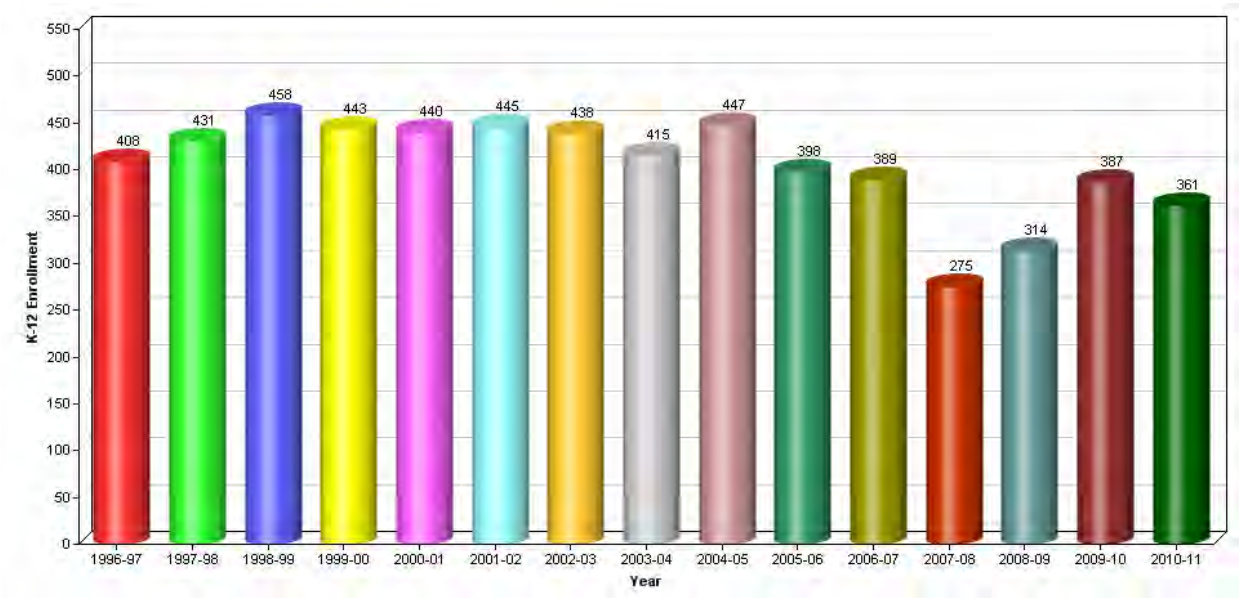


FIGURE 1: Location of Freeport Elementary and John Still Middle School in the Meadowview Area of the City of Sacramento

Freeport Elementary School has experienced some decline in enrollment relative to capacity and historic enrollment patterns. Figure 2 shows the enrollment at Freeport Elementary School over the last 15 years.

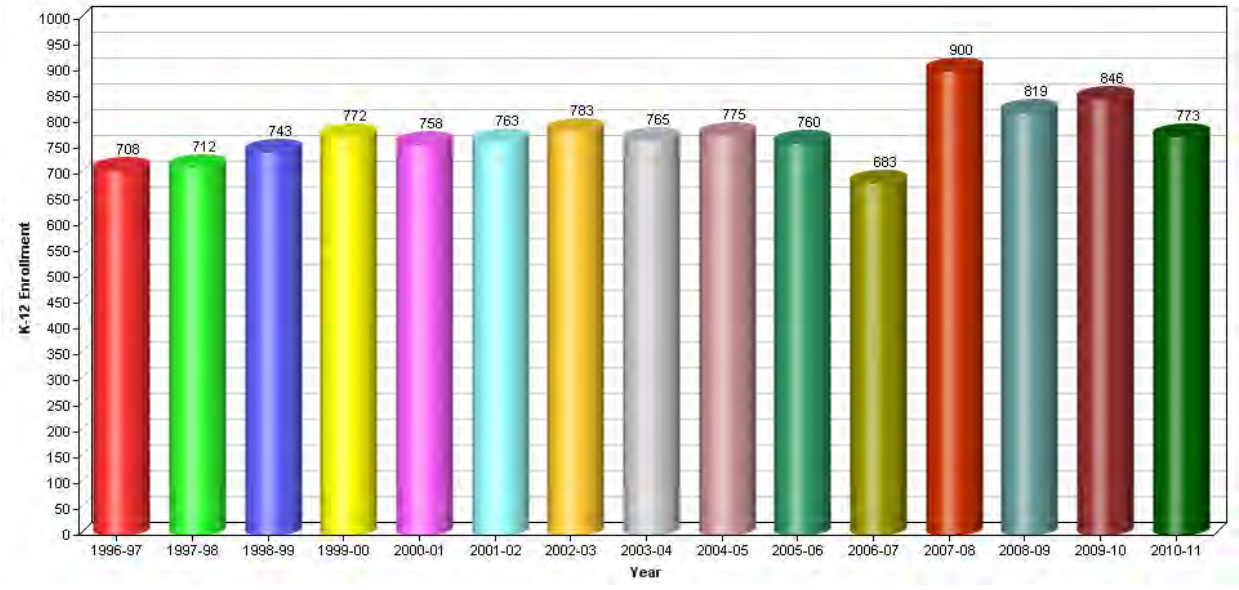
FIGURE 2: Freeport Elementary School Enrollment Graph



Source: California Department of Education (CDE) Data Quest, http://dq.cde.ca.gov/dataques

Similarly, John Still Elementary and Middle School enrollment has fluctuated over the years from a high of 900 students at the site to a low of 683 students (Figure 3). The reported 2010-2011 enrollment at the site according to the State Department of Education was 773. Current (2011-2012) enrollment based on District records is 817 and the school has K-8 capacity for 1,936 students.

FIGURE 3: John Still K-8 School Enrollment Graph



Source: California Department of Education (CDE) Data Quest, http://dq.cde.ca.gov/dataquest

PROCESS FOR DETERMINING THE STATUS OF A PROJECT UNDER THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

The CEQA Guidelines outline a basic process for assessing the type of environmental review required for a project. This process generally requires that the lead agency undertake the following steps:

Define the Action and Determine if it is a Project Under CEQA. Generally CEQA defines a project as any action that requires discretionary approval by the lead agency. In this case, the District's Board of Education is required to use their discretion to approve or disapprove any closures of schools, and the related transfers of students. Thus, the proposed closure of schools would be considered a project under CEQA.

Determine if the Project is Exempt from CEQA by Statute or Category of Action. Section 15061(a) of the CEQA Guidelines states that once a lead agency has determined that an activity is a project subject to CEQA, a lead agency shall determine whether the project is exempt from CEQA. The CEQA statutes and guidelines include a listing of activities which are considered to be exempt from CEQA. Some activities are exempted specifically by statute and others are exempted based on the category of activity. If the lead agency determines that a proposed project is exempt, then a Notice of Exemption is approved by the lead agency for the project and no further environmental review is required.

CEQA EXEMPTIONS APPLICABLE TO THE PROJECT

Section 21080.18 of the CEQA Statutes states that CEQA "does not apply to the closing of any public school in which kindergarten or any of grades 1 through 12 is maintained or the transfer of students from that public school to another school if the only physical changes involved are categorically exempt under Chapter 3 (commencing with Section 15000) of Division 6 of Title 14 of the California Administrative Code." Section 15314, Chapter 3, of Division 6 of Title 14 of the California Administrative Code, defines the categorical exemption for minor additions to schools and states:

"Class 14 consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less. The addition of portable classrooms is included in this exemption."

Table 1 presents an analysis of the proposed consolidation, closures and transfers and compares the resulting enrollment to the school student capacity. John Still Elementary School has a current enrollment estimated at 494 students and a capacity to serve 792 students. John Still Middle School has a current enrollment estimated at 323 students and a capacity to serve 1144 students. If consolidated, the school would have a combined estimated enrollment of K-8 grades of 817 students. As a consolidated K-8, John Still School could accommodate existing enrollment and would still have capacity to serve an additional 1119 students.

Freeport Elementary School has 351 students. These students would be transferred to John Still site (once consolidated as a K-8 site. The combined enrollment of John Still's students (K-6 plus middle school students) at the John Still site is 817 students. As a consolidated K-8, John Still will have the capacity to serve the existing enrollment and an additional unused capacity to serve up to 1119 students. The consolidated John Still site will therefore have more than enough available capacity (1119 student spaces) to house the estimated 351 students which would transfer from Freeport Elementary School.

TABLE 1: CHANGES IN ENROLLMENT COMPARED TO CAPACITY AS A RESULT OF THE PROPOSED ACTIONS

Schools Affected	Year 2011-2012 Enrollment (District Count September 16, 2011)*	Capacity of Schools Receiving Assigned Students	Available Capacity for New Students	New Enrollment Exceed Capacity?
CONSOLIDATE:				
John Still Elementary	494	792	298	
John Still Middle School	323	1144	821	
Totals	*817*	*1936*	*1119*	*No*
CLOSE: Freeport Elementary School. Assign Students To:	351			
John Still K-8 (after consolidation)	817	1936	1119	
Totals	*1168*	*1936*	*1119*	*No*
**Enrollment information from the Enrollment and Capacity Table from the November 3, 2011, "SCHOOL CLOSURE AND CONSOLIDATION RECOMMENDATIONS: OPTIONS AND OPPORTUNITIES" Report to the Board of Education. Capacity Information is based on 100% of capacity included in the Enrollment and Capacity Table.*				

PROCESS FOR SCREENING FOR PHYSICAL OR ENVIRONMENTAL IMPACTS

The CEQA Guidelines Section 15300.2 provide: "A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances." In this context, an unusual circumstance refers to condition which is unusual related to similar school consolidation projects involving transfer of students. Significant is defined as an impact that exceeds an established threshold of significance and which has an adverse impact upon the environment of persons in general.

It is important to also note that an environmental assessment under CEQA is not required to review economic or social effects. Section 15131 of the CEQA Guidelines states that:

> "Economic or social effects of a project shall not be treated as significant effects on the environment. An EIR may trace a chain of cause and effect from a proposed decision on a project through anticipated economic or social changes resulting from the project to physical changes caused in turn by the economic or social changes. The intermediate economic or social changes need not be analyzed in any detail greater than necessary to trace the chain of cause and effect. The focus of the analysis shall be on the physical changes."

Thus, the focus of the environmental screening is on unusual and significant physical effects resulting from the project. In summary, although school consolidations often result in changes to the walking path of travel of students, some traffic or other effects, the challenge of CEQA is to determine if these are unusual for a school consolidation project, and if so, is the change a significant physical effect to the general environment.

ENVIRONMENTAL SCREENING CHECKLIST (INITIAL STUDY)

Attachment 1 is the Environmental Screening Checklist and narrative. This checklist is based on Appendix G of the State CEQA Guidelines as amended. For this review, the Standards of Significance are derived from the City of Sacramento, County of Sacramento and City of Rancho Cordova standards where the affected schools and neighborhoods are located. The Environmental Checklist and Screening was completed using best available information. Sources consulted and incorporated by reference include:

- County of Sacramento General Plan, 2005-2030, adopted by the Board of Supervisors of the County of Sacramento, November 9, 2011. Sacramento, CA.
- Final Environmental Impact Report for the County of Sacramento General Plan, 2005-2030, certified November 9, 2011. Sacramento, CA.
- City of Sacramento *General Plan 2030*, City of Sacramento, March 2009 Sacramento, CA.
- City of Sacramento General Plan 2030, Draft and Final Master Environmental Impact Report, March 2009. Sacramento, CA.
- City of Sacramento General Plan, Technical Background Reports, March 2009. Sacramento, CA.
- City of Sacramento *Register of Historical and Cultural Resources*, City of Sacramento, 2005. Sacramento, CA.
- *Land Use Planning Policy Within the 100-Year Floodplain* (M89-054) adopted by the City Council on February 6, 1990. Sacramento, CA.
- City of Sacramento. *Zoning Ordinance*, Chapter 17.28.30. City of Sacramento, CA.
- 2*010 Sacramento City/County Bikeway Master Plan DEIR*, Sacramento, CA, 2005. Sacramento, CA.
- Sacramento Metropolitan Air Quality Management District CEQA Guide December 2009 Revised April 2011. Sacramento, CA.
- California Governor's Office of Planning and Research. 2003. *Guidelines for the Preparation and Content of the Noise Element of the General Plan*. Appendix A in State of California General Plan guidelines. Sacramento, CA.
- Executive Airport Comprehensive Land Use Plan (CLUP), May 1999 as amended, prepared by the Airport Land Use Commission for Sacramento, Sutter, Yolo and Yuba Counties, and the Sacramento Area Council of Governments.

SUMMARY OF FINDINGS FROM THE ENVIRONMENTAL SCREENING

No significant or unusual physical environmental impacts were identified in the screening process. This does not imply that there will not be any physical environmental changes as a result of the action, but rather that the identified changes would not be considered unusual for similar school consolidation projects and the change would not exceed established thresholds of significance. For example, the screening discloses that there may be some increase in traffic congestion resulting from an increase in enrollment at schools to receive transfer students. Currently most schools experience congestion at peak drop-off and pick-up times. However, the expected congestion will not exceed the design capacity of the school or be in excess of the type of congestion experienced during historic periods of high enrollment. The congestion to be experienced is expected to be periodic and not expected to exceed the City of Sacramento's threshold for significance for roadway level of service.

DETERMINATION

The proposed project would not increase the enrollment of any affected school beyond the original capacity of that school nor would the proposed action require any school to add more than 10 classrooms. Based on this analysis, the proposed project qualifies for a statutory exemption under Section 21080.18. This section

exempts "closing of any public school in which kindergarten or any of grades 1 through 12 is maintained or the transfer of students from that public school to another school if the only physical changes involved are categorically exempt under Chapter 3 (commencing with Section 15000) of Division 6 of Title 14 of the California Administrative Code." No physical changes to the affected schools are required to accommodate re-assigned students. No additions to the existing schools to receive transfer students will be require which would increase the enrollment at that school beyond the original capacity of the school and no new classrooms or portables are required to accommodate the transfer of students.

Attachment 1:

CEQA ENVIRONMENTAL SCREENING CHECKLIST

I.	AESTHETICS Would the project:	Potentially Significant Impact	Less than Significant Impact	No Impact
a)	Have a substantial adverse effect on a scenic vista?			X
b)	Substantially degrade the existing visual character or quality of the site and its surroundings?			X
c)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway.			X
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			X

ENVIRONMENTAL SETTING

The proposed project affects school sites located in the Meadowview neighborhood of the City of Sacramento within the Sacramento City Unified School District boundaries. The schools to be closed and or consolidated are all existing developed facilities. All of the schools include some open space area in the form of playgrounds and athletic fields. For school sites, the District maintains a joint use agreement with the municipal jurisdiction in which the site is located to allow for both school and public use of the school facilities. The proposed project would not change these existing agreements. At this time, there is no proposal to modify the structures of the schools to be closed or consolidated.

ASSESSMENT AND FINDINGS

I a) Views, Vistas and Visual Resources

The Meadowview neighborhood where the schools are located has level terrain and is an existing developed suburban neighborhood. The schools sites are not located near nor do the sites offer views of any significant scenic resources such as major rivers and parkways, unimproved creek corridors, or significant view corridors. An impact to a visual resource would result if the project obscured a significant view or vista or introduced incompatible uses which would degrade the scenic quality of the visual resource. The proposed project does not involve any physical or visual changes to the school properties. Therefore, there are no designated view corridors or vistas which would be affected by proposed actions.

I b) Visual Character

No physical alteration of any of the affected school sites is proposed. Therefore, the visual character of all affected school sites would remain the same and no impacts are anticipated to occur as a result of the project.

I.c) Scenic Resources

All designated Scenic Highways in the County are located outside of the Sacramento City School District Boundaries and are remote from the subject school sites. Scenic Highways in Sacramento County include Garden Highway, the southern portion of Route 160 River Road located generally to the south of the Town of Freeport, and Isleton Road. None of the school sites are located on or would affect a designated Scenic Highway. There are no unusual rock outcroppings on or near either the school sites to be closed or those to receive transfer students. Therefore, no impacts to scenic resources are anticipated.

I.d) Light and Glare

The proposed project does not include any new lighting or new buildings with highly reflective materials. As such, no impacts related to light and glare are expected.

CONCLUSION. The action would not impact visual quality or scenic resources.

II. AGRICULTURAL AND FORESTRY RESOURCES Would the project:	Potentially Significant Impact	Less than Significant Impact	No Impact
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non- agricultural use?			X
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?			X
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?			X
d) Result in the loss of forest land or conversion of forest land to non-forest use?			X
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?			X

ENVIRONMENTAL SETTING

The subject sites are located in the developed urban areas of the City of Sacramento... The California Farmland Mapping and Monitoring Program (CFMMP) of the California Resources Agency is used to identify, map and monitor important agricultural lands in the State. For purposes of CEQA, the California Department of Conservation Farmland Monitoring and Mapping Program (FMMP) is typically used to identify the agricultural value of the land. The categories used in FMMP are briefly described in Table 2. There are relatively few areas within developed areas of the County of Sacramento which are identified by CFMMP as areas of Prime, Unique or Important Farmlands by the FMMP. None of the school sites are located on lands designated as farmlands on the FMMP map.

ASSESSMENT AND FINDINGS

II a) Prime Agricultural Lands

There are no lands designated as Prime Farmlands and Farmlands of Statewide Importance shown of the CFMMP map in the vicinity of the affected school sites. All school sites are currently designated "Urban and Built-Up Lands" on the CFMMP map. As such, the proposed project is estimated to have a *no impact* on Prime Farmlands and Farmlands of Statewide Importance.

TABLE 2: CALIFORNIA FARMLAND MONITORING AND MAPPING PROGRAM DESIGNATIONS

P **Prime Farmland:** Land which has the best combination of physical and chemical characteristics for the production of crops. It has the soil quality, growing season, and moisture supply needed to produce sustained high yields of crops when treated and managed, including water management, according to current farming methods. Prime farmlands must have been in production of irrigated crops at some time during the update cycles prior to the mapping date.

S **Farmland of Statewide Importance:** Farmland of Statewide Importance is similar to Prime Farmland but with minor shortcomings, such as greater slopes or less ability to hold and store moisture. Lands of Statewide Importance must have been in production of irrigated crops at some time during the update cycles prior to the mapping date.

U **Unique Farmland:** This is land of lesser quality soils used for the production of specific high economic value crops (as listed in the California Department of Food and Agriculture *California Agriculture* publication) at some time during the update cycles prior to the mapping date. Examples of Unique Farmlands include oranges, olives, avocados, rice, grapes, and cut flowers.

L **Farmland of Local Importance**: These are farmlands of importance to the local agricultural economy as determined by each County=s board of supervisors and local advisory committees.

G **Grazing Lands**: This is land on which the existing vegetation, whether grown naturally or through management, is suitable for grazing or browsing of livestock. The minimum mapping unit is 40 acres.

D **Urban and Built-up Lands:** This includes lands used for residential, industrial, commercial, construction, institutional, public administrative purposes, railroad yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment plants, water control structures and other development purposes.
The building density for residential must be at least 1 structure per 1.5 acres. Vacant non- agricultural land surrounded by all sides by urban development and which is less than 40 acres in size is considered urban and built-up land.

X **Other Land:** This includes lands such as rural development which is less than 1 structure per 1.5 acres; brush, timberlands, wetlands and other lands not suitable for livestock grazing; vacant non agricultural lands greater than 40 acres in size and surrounded on all sides by urban development, strip mines, borrow pits, large bodies of water over 40 acres, and other rural land uses.

II b) Agricultural Zoning and the Williamson Act

There are no Williamson Act contracts located in the vicinity of the affected school sites. Additionally, none of the affected sites are designated by zoning or the General Plan of the City of Sacramento for agriculture. Therefore, the project will have no impact related to conversion of lands designated under the Williamson Act or zoned for agriculture.

II c) Conflict with Farmland or Forestry Zoning

None of the school sites are located on or adjacent to active farmlands or any lands designated for agriculture on the General Plan or by zoning. The proposed actions will not convert any existing cultivated farmlands to other uses. Therefore, the project has no impact and will not cause the conversion of farmlands.

II d) Result in Conversion of Forest Lands to Other Uses

None of the affected school sites are located on or adjacent to 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)). Therefore, the project will not result in the conversion of forest lands to other uses.

II e) Other Environmental Impacts to Agricultural Lands or Forestry Lands

The proposed project is not located in the vicinity of either farmlands or forestry lands and as such no other impacts to such lands are expected from the project.

CONCLUSION. The action would not impact agricultural resources or forestry lands.

III.	AIR QUALITY Would the project:	Potentially Significant Impact	Less than Significant Impact	No Impact
a)	Conflict with or obstruct implementation of applicable air quality plan?			X
b)	Violate any air quality standard or contribute substantially to an existing or projected air quality violation?			X
c)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?			X
d)	Expose sensitive receptors to substantial pollutant concentrations?			X
e)	Create objectionable odors affecting a substantial number of people?			X

ENVIRONMENTAL AND REGULATORY SETTING

The project site lies within the urbanized area of Sacramento in the Sacramento Valley Air Basin (SVAB), and is subject to federal, state, and local air quality regulations. The project site is in Sacramento County, under the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD). The SMAQMD is responsible for implementing emissions standards and other requirements of federal and state laws.

Both federal and State Ambient Air Quality Standards (AAQS) have been established for criteria air pollutants, with the California AAQS (CAAQS) being more stringent than federal AAQS. While federal and State standards are set to protect public health, adverse health effects still result from air pollution. Table 3 summarizes attainment status for Sacramento County with regards to the CAAQS.

Ozone

The concentration of ground level ozone, commonly referred to as smog, is greatest on warm, windless, sunny days. Ozone is not emitted directly into the air, but forms through a complex series of chemical reactions between two directly emitted ozone precursors – reactive organic gases (ROG) and nitrogen oxides (NOx). These reactions occur over time in the presence of sunlight. The principal sources of the ozone precursors (ROG and NOx) are the combustion of fuels and the evaporation of solvents, paints, and fuels. As a cumulative result of Sacramento regional development patterns, however, motor vehicles produce the majority of ozone precursor emissions. In fact, over 70% of the NOx produced in the region is from motor vehicles. Recognizing the health impacts of day-long ozone exposure, the EPA promulgated an 8-hour standard for ozone in 1997 as a successor to the 1-hour standard.

TABLE 3
AIR QUALITY STANDARDS ATTAINMENT STATUS CHART
for Sacramento County

Parameter	California Standard	Federal Standard
Ozone	Non-Attainment Classification = Serious (1 hour and 8 hour Standards)	Non-Attainment Classification = Serious (8 hour Standard)
Particulate Matter- 10 Micron	Non-Attainment (24 hour Standard and Annual Mean)	Non-Attainment*, Classification = Moderate (24 hr std)
Particulate Matter- 2.5 Micron	Non-Attainment (Annual Standard)	Attainment/Unclassified (24 hour Standard and Annual Mean)
Carbon Monoxide	Attainment (1 hour and 8 hour Standards)	Attainment (1 hour and 8 hour Standards)
Nitrogen Dioxide	Attainment (1 hour Standard)	Attainment (Annual Standard)
Sulfur Dioxide	Attainment (1 hour and 24 hour Standards)	Attainment (3 hour, 24 hour, and Annual Standards)
Lead	Attainment (30 Day Standard)	Attainment (Calendar Quarter)
Visibility Reducing Particles	Unclassified (8 hour Standard)	No Federal Standard
Sulfates	Attainment (24 hour Standard)	No Federal Standard
Hydrogen Sulfide	Unclassified (1 hour Standard)	No Federal Standard

Particulates

Airborne dust contains fine particulate matter (PM10 and PM 2.5) includes a wide range of solid or liquid particles, such as smoke, dust, aerosols and metallic oxides. PM10 (particles with aerodynamic diameters less than 10 microns) can remain in the atmosphere for up to seven days before it is removed from rainout, washout, and gravitational settling. The level of fine particulate matter in the air is a public health concern because PM10 can bypass the body's natural filtration system more easily than larger particles, and can lodge deep in the lungs. The health effects vary depending on a variety of factors, including the type and size of particles. Research has demonstrated a correlation between high PM10 concentrations and increased mortality rates. Elevated PM10 concentrations can also aggravate chronic respiratory illnesses such as bronchitis and asthma.

Carbon Monoxide (CO)

CO is an odorless, colorless gas that is formed by the incomplete combustion of fuels. Motor vehicle emissions are the dominant source of CO in the Sacramento region. At high concentrations, CO reduces the oxygen-carrying capacity of the blood and can cause dizziness, headaches, unconsciousness, and even death. CO can also aggravate cardiovascular disease. CO emissions and ambient concentrations have decreased significantly in recent years. These improvements are due largely to the introduction of cleaner burning motor vehicles and motor vehicle fuels. The Sacramento region has attained the State and federal CO standard. The records from the region's monitoring stations show that the CO standard has not been exceeded since 1999.

STANDARDS OF SIGNIFICANCE

In accordance with the Sacramento Metropolitan Air Quality Management District (SMAQMD) *CEQA Guide December 2009,* a project is considered to have a significant air quality impact if any of the following quantitative conditions occur:

- Ozone: The project will increase nitrogen oxide levels above 85 pounds per day for short term construction effects. The project increases either ozone precursors, nitrogen oxides (NOx) or reactive organic gases (ROG) above 65 pounds per day for long-term effects (operation of the project).
- Particulate Matter (PM10): The project emits pollutants at a level equal to, or greater than five percent of the CAAGS (50 micrograms/cubic meter for 24 hours) if there is an existing or projected violation. However, if a project is below the ROG and NOx thresholds, it is assumed that the project is below the PM 10 thresholds as well.
- Carbon Monoxide (CO): The project results in CO concentrations that exceed the 1-hour State ambient air quality standard of 20.0 parts per million (ppm) or the 8 hour State ambient standard of 9.0 ppm.

The SMAQMD CEQA Guide December 2009 includes both operational and construction period screening tables to determine if a proposed project is anticipated to exceed any of the above thresholds. For operational impacts, the CEQA Guide December 2009 generally considers that the following school uses would <u>not result</u> in significant operational impacts:

- Elementary school with less than 2,320 students
- Junior high school with less than 2,120 students
- High school with less than 2,100 students

ASSESSMENT AND FINDINGS

<u>III. a) and b) Air Quality Standards</u>

Long Term Operational Emissions. Long term emissions relate to air quality emissions from the operation of a project. The amount of operational emissions that result from a project such as a school is largely based on the number of new vehicle trips resulting. In this case, the proposed project may result in minor increases in vehicle trips to the school site receiving transfer students, but would also result in a comparable reduction of vehicle trips to the school site to be closed. Relative to the overall air basin, the net effect of neighborhood level changes in vehicle patterns is not expected to be significant on a project or cumulative basis.

The SMAQMD CEQA Guide December 2009 includes both operational screening tables to determine if a proposed project is anticipated to exceed any of the air quality thresholds. Table 4 shows the estimated maximum enrollment expected at each of the school sites to receive transfer students and compares that enrollment number to the operational screening criteria.

TABLE 4 Air Quality Operational Screening Assessment for Affected School Sites			
School To Receive Re-Assigned Students	**Estimated Maximum Enrollment (Students)****	**Applicable SMAQMD Operational Screening Threshold**	**Exceed SMAQMD Screening Criteria?**
John Still Elementary	792	Elementary school with less than 2,320 students	No
John Still Middle School	1144	Junior high school with less than 2,120 students	No
Total Enrollment as a K-8 at Capacity	*1936*	Elementary school with less than 2,320 students or Junior high school with less than 2,120 students.	No
** Based on enrollment at school capacity which is an enrollment larger than anticipated by the proposed project.			

Short Term, Construction Period Emissions. No construction is proposed as part of this project, therefore, no construction period emissions are anticipated.

III. c) Cumulative Air Quality Impacts

The proposed project will not individually or cumulatively result in substantial new air emission which would exceed the thresholds of significance identified by the SMQAMD.

III. d) Exposure to Substantial Pollutant Concentrations

Because the proposed action does not exceed any of the threshold criteria established by SMAQMD, it is not anticipated that would be a change in substantial pollutant concentrations.

III. e) Odors

The proposed project does not include any activities such that would result in objectionable odors. As such, no odor impacts are anticipated.

CONCLUSION. The proposed action does not exceed any of the SMAQMD's thresholds for significance and therefore, any air quality impacts are not expected to be significant.

IV.	BIOLOGICAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant Impact	No Impact
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?			X
c)	Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?			X
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?			X
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?			X
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?			X

ENVIRONMENTAL SETTING

The affected school sites are located in the Sacramento Valley bio-region of California, a low-lying area, subject to flooding from a variety of rivers that traverse the valley. Specifically, the school sites are located in the Meadowview neighborhood of South Sacramento. This neighborhood is a developed suburban neighborhood within the City of Sacramento.

Vegetative Communities and Habitats. The affected school sites are located in urbanized and developed areas of the City of Sacramento which generally include ornamental or ruderal habitats. The Meadowview community is a suburban neighborhood with ornamental landscaping which consists of areas supporting introduced or non-native trees, shrubs, flowers, and turf grass. Typical species include London Plane tree, European hackberry, ginkgo, sweetgum, gum trees, pepper trees, Canary Island date palm and Mexican fan palm. Despite their highly-manicured and intensively-maintained appearance, urban landscapes offer local wildlife populations a surprising variety of habitat types for exploiting food, nesting, and cover resources. Wildlife species observed throughout ornamental landscaped areas included, raccoon, black tailed hare, opossum, Anna's humming bird, northern flicker, dark- eyed junco, mallard, wood duck, great blue heron, Canada goose, American robin, and western scrub jay, red-tailed hawk, and red-shouldered hawk.

Ruderal habitats are characterized by plant species adapted to continued disturbance (e.g., mowing,

spraying, grading) and are largely composed of non-native annuals that have displaced the more conservative, native perennial species. Non-native species typically observed within these areas include common sow-thistle, white sweet clover, rip-gut brome, wild oat, Bermuda grass, foxtail fescue, Italian rye- grass, wild radish, bur-clover, common plantain, milk thistle, common groundsel, cudweed, filaree, spring vetch, common knotweed, prickly lettuce, red clover, shepherd's purse and bull thistle. Native species observed included fiddleneck, fireweed, horseweed, miniature lupine, and toad-rush. Although not as ecologically diverse as other habitat types, many wildlife species use ruderal communities for all or part of their life cycle. Mammals typically found in these communities include Botta's pocket gopher, California vole, black-tailed hare, California ground squirrel, and western harvest mouse. These rodent populations provide prey for mammalian predators, such as coyote, and avian predators such as American kestrel, red-tailed hawk, barn owl, and great horned owl. Additional species found in this habitat type include killdeer, American crow, mourning dove, savannah sparrow, western meadowlark, gopher snake and striped skunk.

Sensitive Biological Resource Areas. There are no sensitive biological communities on or immediately adjacent to any of the affected school sites which would be affected by the proposed projects. All school sites are in existing developed suburban areas and all sites are developed as school sites.

STANDARDS OF SIGNIFICANCE

The impact of the project on biological resources was evaluated in terms of mandatory findings of significance at Section 15065 of CEQA and Appendix G of the State CEQA Guidelines. Impacts on biological resources are considered significant if the proposed project would:

- create a potential health hazard, or involve the use, production or disposal of materials that pose a hazard to plant or animal populations in the affected area;
- result in substantial degradation of the quality of the environment or reduction of habitat or population below self-sustaining levels of threatened or endangered species of plant or animal; or
- affect other species of special concern to agencies or natural resource organizations (such as regulatory waters and wetlands); or

ASSESSMENT AND FINDINGS

IV a) Special-Status Species

Special-status species are plants and animals that, because of their recognized rarity or vulnerability to various causes of habitat loss or population decline, are recognized in some fashion by federal, state, or other agencies as deserving special consideration. The City of Sacramento General Plan Master Environmental Impact Report (MEIR, March 2009) provides a map of known sensitive habitat areas which support special status species. The subject school sites are located in developed and urbanized areas and none of the sites are within or adjacent to identified areas which support sensitive species. Since the school sites are existing developed areas which are not located in or adjacent to known habitats of special status species, and since there are no major modifications proposed as part of the project which would physically disrupt or harm known special status species, the project is judged to have no impact.

IV b) Riparian Habitat or other Sensitive Natural Communities

The proposed project would involve the transfer of students to existing developed school sites and would not require any modifications to riparian corridors or sensitive natural communities. As such, the project will have no adverse impact on riparian habitats.

IV c) Jurisdictional Waters and Wetlands

All of the affected school sites are located in developed and urbanized areas and none of the sites are within or adjacent to wetland areas identified in the City of Sacramento 2030 General Plan Master EIR. Since the school sites are existing developed sites which are not located on or within known jurisdictional waters or wetlands, the project is judged to have no impact.

IV. d) Native Resident or Migratory Fish or Nursery Sites

Fisheries are by nature located in and along waterways. None of the affected school sites is located on or immediately adjacent to a waterway with resident or migratory fish or nursery sites. No impact.

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

The proposed project would not conflict with any local policies protecting biological resources. According to the school district, no trees would be removed to as part of the project. Rather, the presence of mature shade trees was used as one of the criteria for selecting school sites to remain open by the 7-11 review committee. Therefore, no impacts are anticipated.

IV f) Habitat Conservation Plans

There is no approved Habitat Conservation Plan (HCP) or other conservation plans that cover the affected school sites. The nearest approved HCP covers North Natomas which is located outside the Sacramento City Unified School District's boundaries. The project will have *no impact* on HCPs or other conservation plans.

CONCLUSION The proposed action would have no significant impact on biological resources.

V.	CULTURAL RESOURCES Would the project:	Potentially Significant Impact	Less than Significant Impact	No Impact
a)	Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?			X
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			X
c)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?			X
d)	Disturb any human remains, including those interred outside of formal cemeteries?			X

ENVIRONMENTAL SETTING

The first settlements in the Sacramento Valley likely occurred during the late Pleistocene and early Holocene (14,000 to 8,000 B.P.) period. Sacramento's location within a great valley and at the confluence of two rivers, the Sacramento River and the American River, shaped its early and modern settlements. It is highly likely that Paleo-Indian populations occupied the area with villages located near watercourses. However, the archaeological record of such use is sparse, probably due to recurring natural flood events.

Prehistoric and Historic Archaeology Sensitivity Areas

Previous surveys since 1930 have recorded approximately 80 archaeological sites within the City of Sacramento. The types of archaeological resources discovered include village sites, smaller occupation or special use sites, and lithic scatters which are generally focused on higher spots along the rivers, creeks and sloughs that provided water and sources of food. The City of Sacramento General Plan Master Environmental Impact Report (MEIR) provides a map of potentially sensitivity for cultural resources. This map categorizes areas of the City by the following sensitivities:

- High sensitivity areas are those known to have recorded prehistoric period archaeological resources present. To obscure the precise location and to protect sites from theft and vandalism, these zones have been enlarged, and the areas in between sites have also been included within the zone. The types of prehistoric sites recorded include large village mounds, small villages, and campsites.
- Moderate sensitivity areas include Creeks, other watercourses, and early high spots near waterways that seem likely to have been used for prehistoric occupation are areas of moderate sensitivity.
- Low sensitivity areas indicate that previous research suggests it is unlikely that sites occur in these areas, or may reflect an area where no previous archaeological work has been conducted. It does not rule out the possibility that a site could exist and be obscured through historic use and development or through natural processes, such as siltation. While it is unlikely that a village

would be found, it is possible a small resource such as a temporary campsite or special use site could exist.

Historic Resources and Landmarks

Recognized historic resources are those listed on the Federal Register or identified by State or local registers. None of the school sites are located within a state, federal or locally identified historic district. Additionally, none of the affected school sites are designated on a local, state or the federal register as a historically significant site.

Thresholds of Significance

The California Environmental Quality Act (CEQA) Guidelines Appendix G identifies examples of a significant effect on historic or cultural resources and states that a project will normally have a significant effect if it will:

- Cause a substantial adverse change in the significance of a historical resource as defined in Section 15064.5.
- Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5.
- Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.
- Disturb any human remains, including those interred outside of formal cemeteries.

Section 15064.5 defines a significant adverse effect to include any activity which would: (1) Create a substantially adverse change in the significance of an historical resource including physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired; and/or (2) alter or materially impair the significance of a historical resource.

ASSESSMENT AND FINDINGS

V a) and b) Historic Resource, Archeological Resources. None of the affected school sites are listed on the Sacramento Register, the State or National Register which lists properties or sites or historic significance. All affected school sites are currently developed and none of the actions would require excavation of soils in archeologically sensitive areas. No impact to historic or archeological resources is anticipated.

V c) Geological or Paleontological Resources. There are no known geological or paleontological resources in the vicinity of the affected school sites. Since no sub- surface excavation work is required for this project, no disturbance of below ground features will occur.

V d) Human Remains. None of the affected school sites are located in known or suspected burial sites. Since no sub-surface excavation work is required for this project, no disturbance of below ground features will occur.

CONCLUSION. The project will not affect historic or cultural resources. None of the affected sites are located in sensitive archeological areas or are designated as historic resources. No physical changes to the school sites are required as part of this project.

VI.	GEOLOGY AND SOILS Would the project:	Potentially Significant Impact	Less than Significant Impact	No Impact
a)	Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving: i) Rupture of a known earthquake fault, as delineated on the most recent Alquist- Priolo Earthquake Fault Zone Map issued by the state Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.			**X**
	ii) Strong seismic ground shaking?			**X**
	iii) Seismic-related ground failure, including liquefaction?			**X**
	iv) Landslides?			**X**
b)	Result in substantial soil erosion or the loss of topsoil?			**X**
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?			**X**
d)	Be located on expansive soil, as defined in Table l8-1-B of the Uniform Building Code (l994), creating substantial risks to life or property?			**X**
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?			**X**

ENVIRONMENTAL SETTING

Geology and Topography

The subject area is located in Sacramento County in part of the Great Valley of California. The Great Valley is a flat alluvial plain approximately 50 miles wide and 400 miles long in the central portion of California. Its northern part is the Sacramento Valley drained by the Sacramento River, and its southern part is the San Joaquin Valley drained by the San Joaquin River. It is surrounded by the Sierra Nevada to the east, the Tehachapi Mountains to the south, Coastal Range to the west, and Cascade Range to the north. The topography of the area is relatively flat.

Earthquake Faults and Seismicity.

There are no known faults within the greater Sacramento region. Faults located closest to the urbanized area of Sacramento are the Bear Mountain and New Melones faults to the east, and the Midland Fault to the west. The Bear Mountains fault is the westerly-most fault within the Foothills fault zone, which consists of numerous northwesterly trending faults along the western edge of the Sierra Nevada. The Foothills fault zone is generally bounded by the Bear Mountains and New Melones fault zones. The Sacramento region has experienced groundshaking originating from faults in the Foothills fault zone. In addition, another possible fault lies northwest of Sacramento called the Dunnigan Hills fault.

The severity of an earthquake generally is expressed in two ways—magnitude and intensity. Magnitude quantitatively measures the strength of an earthquake and the amount of energy released by it. Earthquake intensity in a given locality is typically measured using the Modified Mercalli Intensity (MMI) scale with values of this scale ranging from I to XII. The table below identifies the level of intensity according to the MMI scale and describes that intensity with respect to how it would be received or sensed by its receptors. While an earthquake has only one magnitude, it can have many intensities which typically decrease with distance from the epicenter.

TABLE 5: MODIFIED MERCALLI INTENSITY SCALE

Intensity	Description
I	Detected by only sensitive instruments
II	Felt by a few people at rest
III	Felt noticeably indoors, but not always recognized as a quake; vibration like a passing truck
IV	Felt indoors by many and outdoors by few
V	Felt by most people. Some breakage of windows, dishes, and plaster
VI	Felt by all; falling plaster and chimneys; damage small
VII	Damage to buildings varies; depends on quality of construction
VIII	Walls, monuments, chimneys fall; panel walls thrown out of frames
IX	Buildings shift off foundations; foundations crack; ground cracks;
X	Most masonry and frame structures destroyed; ground cracks; landslides
XI	Ground fissures; pipes break; landslides; rails bent; new structures remain standing
XII	Damage total; waves seen on ground surface; objects thrown into the air

According to the *Probabilistic Seismic Hazard Assessment Maps* (2002) prepared by the CGS, Sacramento is in an area of relatively low severity, characterized by peak ground accelerations between 10 and 20 percent of the acceleration of gravity. This is primarily due the lack of known major faults and low historical seismicity in the region. The maximum earthquake intensity expected from this amount of groundshaking would be between VII and VIII on the Modified Mercalli Scale.

Seismic ground-shaking hazard for the City and County of Sacramento is relatively low, ranking among the lowest in the state. Due to the low probability of groundshaking affecting the policy area, the possibility of seismic-induced ground failure is remote.

Liquefaction occurs where surface soils, generally alluvial soils, become saturated with water and

become mobile during ground-shaking caused by a seismic event. When these soils move, the foundations of structures move as well which can cause structural damage. Liquefaction generally occurs below the water table, but can move upward through soils after it has developed.

ASSESSMENT AND FINDINGS

VI a) Seismic Risks. None of the affected school sites is located on or near a fault. Seismic risks to the affected school site would be similar to the seismic risks of ground shaking experienced by the general Sacramento area.

VI b) Soil Erosion VI c) and d) Unstable Soils or Geological Conditions and Expansive Soils. None of the affected school sites are located in areas of unstable soils. All buildings located on the affected school sites were developed under the State Building Code which requires the preparation of a soils engineering study. The proposed project will not require the physical expansion of any of the school sites.

VI e) Septic Tank Risks. All affected school sites are served by the public sewers and therefore, there is no risk of septic tank failure.

CONCLUSION. No soil hazards or impacts have been identified.

VII. GREENHOUSE GAS EMISSIONS Would the project:	Potentially Significant Impact	Less than Significant Impact	No Impact
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?		X	
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X

ENVIRONMENTAL SETTING

Climate change is a global problem. Greenhouse Gases (GHGs) are global pollutants. Whereas other pollutants with localized air quality effects have relatively short atmospheric lifetimes (about 1 day), GHGs have long atmospheric lifetimes (1 year to several thousand years). GHGs persist in the atmosphere for long enough time periods to be dispersed around the globe. Similarly, impacts of GHGs are also borne globally. The quantity of GHGs that it takes to ultimately result in climate change is not precisely known; however, it is clear that the quantity is enormous, and no single project alone would measurably contribute to a noticeable incremental change in the global average temperature, or to global, local, or micro climate. Therefore, from the standpoint of CEQA, GHG impacts to global climate change are inherently cumulative.

Prominent GHGs of primary concern from land use development projects include carbon dioxide (CO2), methane (CH4), and nitrous oxide (N2O). Other GHGs such as hydrofluorocarbons, chlorofluorocarbons, and sulfur hexafluoride are of less concern because construction and operational activities associated with land use development projects are not likely to generate substantial quantities of these GHGs.

The Sacramento Area Metropolitan Air Quality Management District (SMAQMD) identifies the following types of land use development projects which may typically include the following sources of GHG emissions[3]:

- Construction activities resulting in exhaust emissions of GHGs from fuel combustion for mobile heavy-duty diesel- and gasoline-powered equipment, portable auxiliary equipment, material delivery trucks, and worker commuter trips;
- Motor vehicle trips generated by the particular land use (i.e. vehicles arriving and leaving the project site), including those by residents, shoppers, workers, and vendors;
- Onsite fuel combustion for space and water heating, landscape maintenance equipment, and fireplaces/stoves; and
- Offsite emissions at utility providers associated with the project's electricity and water demands.

The SMAQMD has not developed screening levels for GHG emissions from projects in Sacramento County. The District assumes that projects described in CEQA's categorical and statutory exemption provisions (Articles 18 and 19 of the California Code of Regulations, Title 14) would not interfere with achieving emission reductions from new projects subject to CEQA. The District also assumes that GHG emissions from residential and commercial projects that are described in the categorical exemption language appear to be relatively small from a GHG perspective and are also considered less-than–cumulatively considerable.

[3] Sacramento Metropolitan Air Quality Management District CEQA Guide December 2009, Revised April 2011

ASSESSMENT AND FINDINGS

VII. a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment? As noted above, nearly all uses generate some greenhouse gases. However, the SMAQMD considers activities that are generally either categorical or statutory exempt activities would not be considered significant levels of GHG either individually or cumulatively. The proposed project may have fluctuating levels of vehicle trips depending on weather, community behavior (willingness to carpool) and other factors. However, the vehicle trips would not be greater than the planned capacity of the existing school site or the trips associated with historic periods of high enrollment. GHG emissions are estimated to be less than significant.

VII. b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases? The proposed project is not anticipated to conflict with any policy or regulation adopted for the purposes of GHG emission reduction. Most communities are adopting Climate Action Plans to address GHG. These plans for instance promote maintenance of mature trees and landscaping which reduces greenhouse gases, use of energy efficient materials and equipment and other activities. The proposed project would not conflict with these plans.

CONCLUSION.

The proposed project does not involve the construction of new buildings or the creation of new uses which would create a substantial contribution to GHG emissions.

VIII. HAZARDS AND HAZARDOUS MATERIALS Would the project:		Potentially Significant Impact	Less than Significant Impact	No Impact
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			X
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.			X
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?			X
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			X
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?			X
f)	For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?			X
g)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			X
h)	Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?			X
i)	Other public hazards:			X

REGULATORY SETTING

Hazardous materials storage, transportation, removal and clean-up are highly regulated fields. The federal and state governments have enacted laws that require property owners to pay for the clean-up of hazardous material contamination located on, or originating from their land. Because of potential clean up and health-related liabilities from the presence of hazardous material contamination, environmental assessments are routinely performed prior to land sale and development.

Summarized below are some of the most significant federal, state and local regulations governing hazardous materials handling.

Federal Hazardous Materials Regulations

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLA, commonly referred to as Superfund, was enacted on December 11, 1980. The purpose of CERCLA was to provide authorities the ability to respond to uncontrolled releases of hazardous substances from inactive hazardous waste sites that endanger public health and the environment. CERCLA established prohibitions and requirements concerning closed and abandoned hazardous waste sites, provided for liability of persons responsible for releases of hazardous waste at such sites, and established a trust fund to provide for cleanup when no responsible party could be identified. In addition, CERCLA provided for the revision and republishing of the National Contingency Plan (NCP) that provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, or contaminants. The NCP also provides for the National Priorities List (NPL), a list of national priorities among releases or threatened releases throughout the United States for the purpose of taking remedial action.

The Superfund Amendments and Reauthorization Act (SARA) amended CERCLA on October 17, 1986. This amendment increased the size of the Hazardous Response Trust Fund to $8.5 billion, expanded EPA's response authority, strengthened enforcement activities at Superfund sites; and broadened the application of the law to include federal facilities. In addition, new provisions were added to the law that dealt with emergency planning and community right to know. SARA also required EPA to revise the Hazard Ranking System (HRS) to ensure that the HRS accurately assesses the relative degree of risk to human health and the environment posed by sites and facilities subject to review for listing on the NPL.

Resource Conservation and Recovery Act of 1976 (RCRA) as amended by the Solid Waste Disposal Act of 1980 (HSWA), the Hazardous Waste and Solid Waste Amendments of 1984. RCRA is the nation's hazardous waste control law. It defines hazardous waste, provides for a cradle-to-grave tracking system and imposes stringent requirements on treatment, storage and disposal facilities. RCRA requires environmentally sound closure of hazardous waste management units at treatment, storage, and disposal facilities. The U.S. Environmental Protection Agency is the principal agency responsible for the administration of RCRA, SARA, and CERCLA.

State Hazardous Materials Regulations and Agencies

Hazardous Substance Account Act (1984), California Health and Safety Code Section 25300 et seq. (HSAA). This act, known as the California Superfund, has three purposes: 1) to respond to releases of hazardous substances; 2) to compensate for damages caused by such releases; and 3) to pay the state's 10% share in CERCLA cleanups. Contaminated sites that fail to score above a certain threshold level in the Environmental Protection Agency's (EPA's) ranking system may be placed on the State Superfund list of hazardous wastes requiring cleanup.

The Department of Toxic Substance Control (DTSC) within the California Environmental Protection Agency (Cal/EPA) has regulatory responsibility under 22 CCR for the administration of the state and federal Superfund programs for the management and cleanup of hazardous materials. The enforcement of regulations administered by DTSC has been delegated locally to Sacramento County Environmental Management Department (SCEMD).

The State Water Resources Control Board, acting through the Central Valley Regional Water Quality Control Board (CVRWQCB), regulates surface and groundwater quality pursuant to the

Porter-Cologne Water Quality Act, the federal Clean Water Act, and the Underground Tank Law. Under these laws, CVRWQCB is authorized to supervise the cleanup of hazardous wastes sites referred to it by local agencies in those situations where water quality may be affected.

Depending on the nature of contamination, the lead agency responsible for the regulation of hazardous materials at the site can be the DTSC, CVRWQCB, or both. DTSC evaluates contaminated sites to ascertain risks to human health and the environment. Sites can be ranked by DTSC or referred for evaluation by the CVRWQCB. In general, contamination affecting soil and groundwater is handled by CVRWQCB and contamination of soils is handled by DTSC.

STANDARDS OF SIGNIFICANCE

For the purposes of this document, an impact is considered significant if the proposed project would:

- Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated soil during construction activities;
- Expose people (e.g., residents, pedestrians, construction workers) to asbestos- containing materials; or
- Expose people (e.g., residents, pedestrians, construction workers) to existing contaminated groundwater during dewatering activities.
- Create substantial risk of a hazardous material spill during construction or operation of the project.

ASSESSMENT AND FINDINGS

VII a) and b). Hazardous Material Risks and VII d) Hazardous Materials Sites, None of the affected school sites sponsor or house activities which involve the routine handling, transport, use, or disposal of hazardous materials or emit hazardous emissions. None of the affected school sites are listed on the State Department of Toxic Substances Control's Enviro-store Database of hazardous sites.

VII c) Emissions Near a School. The project does not involve any land uses or practices which would cause hazardous materials or hazardous emissions on or near a school site. With the exception of roadway corridors and freeways which emit vehicle emissions, there are no identified uses which emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of the affected school sites.

VII e) and f) Airport Safety. None of the affected schools sites fall within an Airport Land Use Plan. The nearest airport is the Executive Airport located approximately 1.8 miles to the north of the John Still site and 1.4 miles north of Freeport Elementary School. Neither the Freeport nor the John Still school sites are located in the designated land use planning area of this airport.

VII g) Emergency Response. The proposed project would not physically interfere with an adopted emergency response plan or emergency evacuation plan.

VII h) Wildlands Fire Risk. Risks of wildfire are minimal. All affected school sites are located in developed residential areas away from open grasslands or hills.

VII i) Other Public Hazards. No other public hazards affecting the site or affected by the project are

known other than those discussed in this document.

CONCLUSION. The proposed action does not pose any new, unusual or significant public hazards.

IX. HYDROLOGY AND WATER QUALITY Would the project:	Potentially Significant Impact	Less than Significant Impact	No Impact
a) Violate any water quality standards or waste discharge requirements?			X
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?			X
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?			X
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?			X
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?			X
f) Otherwise substantially degrade water quality?			X
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?			X
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?			X
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?		X	
j) Inundation by seiche, tsunami, or mudflow?			X

ENVIRONMENTAL SETTING

Surface Water Resources

Major surface water resources in Sacramento include the Sacramento River, the American River and their tributaries. The Sacramento River Basin encompasses about 27,000 square miles and is bounded by the Sierra Nevada to the east, the Coast Ranges to the west, the Cascade Range and Trinity Mountains to the north, and the Delta to the southeast. The Sacramento River Basin is the

largest river in California.

The American River watershed is situated on the western slope of the Sierra Nevada, extending from the spine of the Sierra Nevada westward to the City of Sacramento. Elevations in the watershed range from above 10,000 feet in the high Sierra to 23 feet above mean sea level at the confluence of the American and Sacramento rivers. The river is regulated by dams, canals, pipelines, and penstocks for power generation, flood control, water supply, recreation, and fisheries and wildlife management. The Folsom Dam is located on the American River, owned and operated by the U.S. Bureau of Reclamation. Folsom Lake and its afterbay, Lake Natomas, release water to the lower American River and to the Folsom South Canal. The operation of Folsom Dam directly affects most of the water utilities on the American River system.

Surface Water Quality

The Sacramento and American Rivers have been classified by the Central Valley Regional Water Quality Control Board (CVRWQCB) as having numerous beneficial uses, including providing municipal, agricultural, and recreational water supply. Other beneficial uses include freshwater habitat, spawning grounds, wildlife habitat, navigation on the Sacramento River, and industrial uses on the American River. The reaches of the Sacramento and American Rivers that flow through the Sacramento urban area are considered impaired and listed on the EPA approved 2002 Section 303(d) list of impaired and threatened waters for California. The Sacramento Coordinated Water Quality Monitoring Program (CMP) was formed by the Sacramento Regional County Sanitation District (SRCSD), Sacramento County Water Resources Division, and the City of Sacramento in May of 1991. The CMP began a long-term Ambient Water Quality Monitoring Program for the Sacramento and American Rivers in 1992. Based on the latest available monitoring results, the period of December 1992 through June 2003, ambient water quality characteristics monitored by the Ambient Program showed that water quality consistently met applicable regulatory limits in the both rivers. Based on current water quality reports, the American and Sacramento Rivers are both excellent supplies for drinking water. These rivers can be treated to meet all Title 22 drinking water standards using conventional and direct filtration processes, as well as newer membrane technologies. There are no persistent constituents in the raw waters that require additional treatment processes. However, there are sometimes seasonal treatment requirements for rice herbicides on the Sacramento River, which is addressed through chemical treatment. Turbidity is high when water is not clear or “muddy”.

Ground Water Resources

The aquifer system underlying the City is part of the larger Central Valley groundwater basin. The Sacramento, American, and Cosumnes Rivers are the main surface water tributaries that drain much of Sacramento and recharge the aquifer system. Surface inflows to the east of the City Limits, and deep percolation of precipitation and surface water applied to irrigated crop land recharge the aquifer system. Groundwater is depleted by pumped extraction of groundwater for municipal, industrial, and agricultural purposes.

Water Quality

The water quality of the American River is considered very good. The Sacramento River water is considered to be of good quality also, although higher sediment loads and extensive irrigated agriculture upstream of Sacramento tend to degrade the water quality. During the spring and fall, irrigation tailwaters are discharged into drainage canals that flow to the river. In the winter, runoff flows over these same areas. In both instances, flows are highly turbid and introduce large amounts of herbicides and pesticides into the drainage canals, particularly rice field herbicides in May and June. The aesthetic quality of the river is changed from relatively clear to turbid from irrigation discharges.

The Central Valley Regional Water Quality Control Board (RWQCB) has primary responsibility for protecting the quality of surface and groundwaters within the City. The RWQCB's efforts are generally focused on preventing either the introduction of new pollutants or an increase in the discharge of existing pollutants into bodies of water that fall under its jurisdiction. The proximity of the Sacramento and American rivers to the urbanized area of Sacramento and the existence of both a shallow water table and deep aquifer beneath the area keep the RWQCB interested in activities in the area.

STANDARDS OF SIGNIFICANCE

Water Quality. For purposes of this environmental document, an impact is considered significant if the proposed project would substantially degrade water quality and violate any water quality objectives set by the State Water Resources Control Board, due to increased sediments and other contaminants generated by consumption and/or operation activities.

Flooding. Substantially increase exposure of people and/or property to the risk of injury and damage in the event of a 100-year flood.

ASSESSMENT AND FINDINGS

VIII-a Water Quality and Waste Water

Water quality could be impacted if a proposed project caused a discharge into a waterway or ground water basin. The proposed project does not involve any direct physical changes to the environment which would create new discharges. The project involves transfer of students from some existing schools to other existing schools. In all cases the total enrollment at the receiving school is within the design capacity of the school and thus, the sanitary sewer and domestic water systems are designed for the change in enrollment on campus. All of the affected school sites are located within an area served by the Sacramento Regional Waste Water Treatment Plant (SRWWTP). All affected school sites are currently "hooked" up to this sewer system. The proposed project will not increase water discharges beyond the planned capacity of the school site system or the regional treatment system.

VIII-b. Ground Water Impacts

The proposed project will not involve construction of new facilities which would require new sources of water (new water wells) or generate waste water (septic tanks) that could affect groundwater resources.

VIII-c and d. Drainage and/or Waterway Alterations

The proposed project will not require any alteration of waterways or drainage patterns. Students will be transferred from one existing school sites to other existing school sites, and no discharges or changes to drainage patterns will result from this activity.

VIII- e and f. Run-off and Water Quality

Construction related activities have the potential to impact water quality. Fuel, oil, grease, solvents, concrete wash and other chemicals used in construction activities have the potential of creating toxic problems if allowed to enter a waterway. Construction activities are also a source of various other materials including trash, soap, and sanitary wastes. The proposed project will not require any physical alteration of schools or construction which would create run-off, erosion or affect water quality.

VIII. g, h, and i. Flood Risks

The Sacramento area is a flood prone area. The affected school sites are located within the City of Sacramento within a portion of the 100 year flood plain which is protected by levees. The Federal Emergency Management Agency (FEMA) categorizes the risk of flood by mapping flood zone. The school sites within the City of Sacramento which are also within the 100 year flood plain are designated Zone X or Shaded Zone X on the City of Sacramento Flood Insurance Rate Map (FIRM), current as of December 2008. These zones are protected by levees or other flood control improvements. These zones are defined by FEMA as follows:

> "Zones X and Shaded X correspond to areas of minimal and moderate flood hazard, respectively, both outside the 1-percent annual chance floodplain, 1-percent annual chance sheet flow flooding where average depths are less than 1 foot, 1-percent annual chance stream flooding where the contributing drainage area is less than 1 square mile, or areas protected from the 1-percent annual chance flood by levees. No Base Flood Elevations or depths are calculated within this zone. Flood insurance purchase is not required in these zones."

Since both the school sites to be closed and the school sites to receive the students are located in the same flood zone designation, there is no change in the risk of exposure to flooding as a result of the transfers.

VIII-j. Seismic Hazards and other Water Hazards

There are no known occurrences of inundation by seiche, tsunami, or mudflows on or in the vicinity of any of the affected school sites. No impact is anticipated.

CONCLUSION. No unusual or significant impacts related to water resources or flood hazards have been identified that would occur as a result of the project.

X. LAND USE AND PLANNING Would the project:		Potentially Significant Impact	Less than Significant Impact	No Impact
a)	Physically divide an established community?			X
b)	Conflict with any applicable land use plan, policy, regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?			X
c)	Conflict with any applicable habitat conservation plan or natural community conservation plan?			X

ENVIRONMENTAL SETTING

The affected school sites fall under the land use jurisdiction of the City of Sacramento. The Table 6 below summarizes applicable General Plan and zoning designation for each of the affected school sites.

TABLE 6: General Plan and Zoning Designations for Affected School Sites.

Schools Affected	Planning Jurisdiction	Applicable General Plan	Designation	Zoning	Public School Use Compatible?
Freeport Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
John Still Consolidated K-8	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES

The City of Sacramento General Plan and Zoning. The City's General Plan designates both the Freeport and the John Still School sites as "Public/Quasi Public". The City's General Plan describes this designation as follows:

> "The Public/Quasi-Public designation describes areas with unique uses and typically unique urban forms. These areas host community services and/or educational, cultural, administrative, and recreational facilities often located within a well-landscaped setting. Most of these areas provide a public function and as a result, existing buildings often include a significant amount of surface parking lots and structured parking to accommodate users of the facilities. It should be noted that many Public/Quasi-Public uses are also allowed and are located in other land use and urban form designations. Building forms vary due to the variety of activities, though most buildings tend to be fairly large floor-plate, multi-story structures containing meeting rooms, classrooms, offices, assembly areas, and research space. Generally, automobile access and parking are limited to the periphery of the site in order to create a park-like pedestrian zone. Similarly, recreation facilities such as parks,

greenways, stadiums, tracks, ball fields, and tennis courts are located on the perimeter of the public use."

Public and private schools are allowed uses within the "Public/ Quasi Public" designation. Since public school use is allowed and compatible with this designation, school uses on the above sites are consistent with the City of Sacramento General Plan designation.

Freeport Elementary School and John Still Consolidated K-8 are zoned by the City of Sacramento as "R-1". The City of Sacramento Zoning Title 17, the Comprehensive Zoning Plan of the City of Sacramento defines this zone as "a low density residential zone composed of single-family detached residences on lots a minimum of fifty-two (52) feet by one hundred (100) feet in size. A duplex or halfplex is allowed on a corner lot subject to compliance with specific restrictions. In addition, alternative ownership housing types, such as townhouses, rowhouses, and cluster housing, may be permitted with a special permit to satisfy inclusionary housing requirements. This zone may also include recreational, religious and educational facilities as the basic elements of a balanced neighborhood. Such areas should be clearly defined and without encroachment by uses not performing a neighborhood function. Minimum lot dimensions are fifty-two (52) feet by one hundred (100) feet interior, sixty-two (62) feet by one hundred (100) feet corner. Approximate density for the R-1 zone is six to eight dwelling units per acre." Schools are specifically allowed in this zone.

DISCUSSION OF DETERMINATION

IX a) Physically divide an established community

The proposed project will not physically divide an established community in that no new roads, facilities or barriers are included in the project that physically divide an existing neighborhood. Students to be transferred from Freeport Elementary School would attend John Still School located approximately 0.5 miles south of Freeport School. Both schools are located in the Meadowview neighborhood.

IX b) Conflict with any applicable land use plans, policies, regulations adopted for the purpose of avoiding or mitigating an environmental effect?

The proposed project would not conflict with the General Plan or Community Plans or the policies of those plans. The project would not change the land use of the school sites. The transfer of students to schools with available capacity is consistent with the Public/ Quasi Public land use designation of the General Plan and Community Plans.

IX c) Habitat Conservation Plans

There is no approved Habitat Conservation Plan (HCP) or other conservation plans that cover the affected school sites. The nearest approved HCP is applicable to the North Natomas area which is located outside the Sacramento City Unified School District's boundaries.

CONCLUSION. The proposed action does not pose any significant land use impacts or change the use of a subject site in a manner which would be incompatible with the adopted General Plan or zoning for the site and surrounding area.

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

ENVIRONMENTAL SETTING

The Sacramento area has historically supported sand and gravel mining to support the construction trade. In upstream areas along the American River, gold mining occurs although no gold mines are currently located in urbanized areas of the County. The County of Sacramento's General Plan Conservation Element, provides information about mineral resources in the County. Figures 2 and 3 of the County General Plan, Conservation Element indicate areas where State Aggregate Resource Areas (as defined by State of California Department of Conservation, Division of Mines and Geology) and other mineral resources are located. None of the subject school sites which are located within the City of Sacramento are located in an area with known aggregate or mineral resources.

DISCUSSION OF DETERMINATION

X. a and b Mineral Resources

Freeport Elementary and John Still K-8 schools are located in a developed area of the City of Sacramento. The Meadowview area where the sites are located is not an area of known mineral resources. No significant impact to mineral resources is anticipated to occur as a result of transferring students from one school site to another in the Meadowview area.

CONCLUSION. The proposed action would not result in loss of the availability of existing mineral resources. The proposed action would assign students from one existing school location to another and would not result in the construction of a new school facility located near mining operations or construction of a new school located in areas of existing mineral resources.

XII. NOISE Would the project result in:	Potentially Significant Impact	Less than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?			X
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?			X
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?		X	
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?			X
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?			X

ENVIRONMENTAL SETTING

Noise is defined as unwanted sound. Sound levels are usually measured and expressed in decibels (dB) with 0 dB being the threshold of hearing. Typical examples of decibel levels would be low decibel level of 50 dB for light traffic to a high decibel level of 120 dB for a jet takeoff at 200 feet. Noise levels which exceed 140 dB may cause pain to the person experienced them. There are various methods for assessing noise levels. CNEL refers to Community Noise Equivalent Level which is defined as the 24-hour average noise level with noise occurring during evening hours (7 - 10 p.m.) weighted by a factor of three and nighttime hours weighted by a factor of 10 prior to averaging. Ldn is similar to CNEL however; the weighted measure of noise includes a 10 dB penalty added to noise occurring between 10 p.m. and 7 a.m., when people are generally more sensitive to noise. Schools and residential uses are generally considered sensitive receptors of noise.

The *State of California General Plan Guidelines*, published by the Governor's Office of Planning and Research (2003), provides guidance for the acceptability of projects within specific CNEL or Ldn contours. Generally, residential uses are considered to be acceptable in areas where exterior noise levels do not exceed 60 CNEL or Ldn. Schools are normally acceptable in areas up to 70 dBA CNEL and normally unacceptable in areas exceeding 70 CNEL. The City of Sacramento General Plan Noise Element sets the acceptable standards for noise levels by land use in the City of Sacramento. The City's Noise Element sets a maximum of 70 CNEL for transportation noise exposure to school sites from roadways

and railroads.

Noise Environment of Affected School Sites Subject to the City of Sacramento Noise Element of the General Plan

The City of Sacramento 2030 General Plan Noise Elements sets a noise maximum from major transportation sources of 70 dB or CNEL for school sites. Noise Contour maps were developed as part of the General Plan process for all major transportation sources.

Freeport Elementary School. Freeport Elementary School is located along Meadowview Road where the CNEL may exceed 70dB. Generally, the school buildings and play areas are set back from the roadway and fall with a 60 or 65 CNEL contour which is generally acceptable for school site exposure to transportation noise.

John Still Consolidated K-8. Major transportation noise sources in the Meadowview area surrounding the school include: Meadowview Road and Interstate 5. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this site is outside the 60 CNEL contour for all noise transportation noise sources. Therefore, this site has and will continue to be in an area where the CNEL is 60 dB or less and which is consistent with the City of Sacramento's Noise Element requirement that school sites be located in areas which are not subjected to transportation noise in excess of 70dB. In general, noise exposure at the John Still site is less than that at the Freeport site since the John Still site is surrounded by single family units and quieter residential streets.

STANDARDS OF SIGNIFICANCE

Thresholds of significance are those established by the Title 24 standards and by the General Plan Noise Element for the planning jurisdictions in which the affected school sites are located. Noise impacts resulting from the implementation of the proposed project would be considered significant if they cause:

- Expose sensitive land uses such as schools to unacceptable levels of transportation noise from a major transportation source which would exceed the Noise Element guidelines for that land use (in this case school use).
- Generate new noise sources above the upper value of the normally acceptable category for various land uses caused by noise level increases due to the project;
- Introduce a new land use which is in conflict with an acceptable uses of the Noise Contours of an adopted Airport Community Land Use Plan.

DISCUSSION OF DETERMINATION

XII. a, b, c, and d Noise Exposure from Major Noise Sources

Based on the analysis included in the environmental setting section above, the transfer of students to John Still school site would not result in more students being exposed to noise from major transportation sources which would exceed the established threshold of the City of Sacramento's Noise Element.

XII. c, and d Noise Generation

School sites do generate some noise. Noise impacts related to the project would include minor periodic increases in traffic noise as a result of pick-up and transfer of students. Traffic speeds for drop off of students are generally low speeds. Lower vehicle speeds generally correlates to lower vehicle noise. Other periodic noise may be associated with students playing sports or enjoying recess. For example, at a distance of 100 feet from an elementary school playground being used by 100 students, average and maximum noise levels of 60 and 75 dB, respectively, can be expected. These noise effects would not be unusual or unexpected. The affected school sites to receive transfer or reassigned students will have more students on site during the day; however, the number of students will not exceed the capacity of the site or the historic enrollment at the site. Thus, it is not expected that the significant new sources of noise will be created by the proposed project rather noise levels would be similar to historic noise levels experienced during school sessions when the subject schools had higher enrollment. The proposed project does not include new school facilities (such as stadiums or amphitheaters) which would create significant new sources of noise. No significant new noise generation is expected as a result of this project.

XII. e and f. Exposure to Noise from Aircraft

Both the Freeport and John Still school sites are located outside of the 65 CNEL noise contour of Executive Airport and are located outside of the Executive Airport's Land Use Planning area. As such, the proposed project will not result in unacceptable exposure to aircraft noise or introduce a new use which is incompatible with the noise requirements of an Airport Community Land Use Plan.

CONCLUSION. No significant or unusual noise impacts are expected.

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

ENVIRONMENTAL SETTING

All affected sites are existing developed schools within existing urban or suburban areas. The proposed project would not increase new housing or population growth.

DISCUSSION OF DETERMINATION

XII a) Extension of Services and Growth Inducement

The proposed project does not involve the extension of public services or new growth and development. The project would transfer existing students from an existing school site to another existing school site. No growth inducement impact would occur.

XII b) and c) Displacement of Persons from Existing Housing and Replacement Housing

The project will not require the acquisition of existing housing or the displacement of persons from their housing or the construction of replacement housing. No housing displacement or replacement housing impacts would occur.

CONCLUSION. The proposed project will not result in growth inducement or the displacement of persons from existing housing. Therefore, no impacts would occur.

XV. TRANSPORTATION/TRAFFIC Would the project:		Potentially Significant Impact	Less than Significant Impact	No Impact
a)	Conflict with an applicable plan, ordinance or policy establishing measures of effectiveness for the performance of the circulation system, taking into account all modes of transportation including mass transit and non-motorized travel and relevant components of the circulation system, including but not limited to intersections, streets, highways and freeways, pedestrian and bicycle paths, and mass transit?			X
b)	Conflict with an applicable congestion management program, including, but not limited to level of service standards and travel demand measures, or other standards established by the county congestion management agency for designated roads or highways?			X
c)	Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?			X
d)	Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?			X
e)	Result in inadequate emergency access?			X
f)	Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities			X

ENVIRONMENTAL SETTING

Transportation Setting of Schools Proposed to Be Closed and Schools Proposed to Receive Transfer Students

For school sites which are proposed to be closed, there would be no traffic impacts since the site would no longer generate traffic. For schools to receive students re-assigned from a closed school, concerns to be reviewed include how far away the school site where students will be transferred to is from the site proposed to be closed; whether or not there are controlled (signal or stop sign) intersections with crosswalks and the availability of drop off lanes or off-street parking areas to deliver and pick up students.

John Still Elementary School. This school is located at 2200 John Still Drive in the Meadowview area of the City of Sacramento. It is immediately adjacent and co-located with John Still Middle School. John Still Elementary School is proposed to receive the students from Freeport Elementary School which is proposed to be closed. Freeport Elementary School is located 0.5 miles to the north of John Still Elementary School. Students who might be re-assigned from Freeport Elementary School would not need to cross any major arterial such as Meadowview Road since both the existing Freeport Elementary School assignment area and John Still Elementary are located to the south of Meadowview Road. Thus, re-

assigned students would take residential streets to John Still Drive and there would be no major street crossings necessary. There are cross walks at all intersections on John Still Drive between 19th and 24th Streets. This school has a drop off lane in the parking lot. Figures 4 and 5 show the current cross walks and drop off areas on or near John Still School.

STANDARDS OF SIGNIFICANCE

Level of Service (LOS) is a standard frequently used to determine if traffic or congestion is unacceptable. In the City of Sacramento, LOS D is generally considered acceptable and in some cases the City may consider LOS E or F acceptable. The reason the City accepts a lower level of service is to encourage transit use and attain other adopted goals. The City's 2030 General Plan Mobility Element, Level of Service Policy states "The City shall allow for flexible Level of Service (LOS) standards, which will permit increased densities and mix of uses to increase transit ridership, biking, and walking, which decreases auto travel, thereby reducing air pollution, energy consumption, and greenhouse gas emissions."

Level of Service definitions are shown in Table 7 below and are applicable to signalized intersections:

TABLE 7
LEVEL OF SERVICE CRITERIA FOR SIGNALIZED INTERSECTIONS

Level of Service	Delay per Vehicle (seconds)	Description
A	≤ 10.0	Very low control delay. Occurs when progression is extremely favorable and most vehicles arrive during the green phase. Most vehicles do not stop at all. Short cycle lengths may also contribute to low delay.
B	> 10.0 and ≤ 20.0	Generally occurs with good progression, short cycle lengths, or both. More vehicles stop than with LOS "A," causing higher levels of average delay.
C	> 20.0 and ≤ 35.0	These higher delays may result from fair progression, longer cycle lengths, or both. Individual cycle failures may begin to appear at this level. The number of vehicles stopping is significant at this level, though many still pass through the intersection without stopping.
D	> 35.0 and ≤ 55.0	The influence of congestion becomes more noticeable. Longer delays may result from some combination of unfavorable progression, long cycle lengths, or high v/c ratios. Many vehicles stop, and the proportion of vehicles not stopping declines. Individual cycle failures are noticeable.
E	> 55.0 and ≤ 80.0	These high delay values generally indicate poor progression, long cycle lengths, and high v/c ratios. Individual cycle failures are frequent occurrences.
F	> 80.0	This level, considered to be unacceptable to most drivers, often occurs with oversaturation, that is, when arrival flow rates exceed the capacity of the intersection. It may also occur at high v/c ratios below 1.0 with many individual cycle failures. Poor progression and long cycle lengths may also be major contributing causes to such delay levels.

Source: Highway Capacity Manual, Transportation Research Board, Special Report No. 209, 2000.

Figure 4: John Still Elementary School Drop Off Locations and Locations of Cross Walks on John Still Drive Immediately Adjacent to the School Site

Figure 5: Location of Cross Walks along John Still Drive

DISCUSSION OF DETERMINATION

XIII. a, and c, Project Traffic Volumes, Level of Service and Operations. It is expected that the schools to receive transfers will have an increase in the number of vehicles picking up or dropping off students. It is expected that at peak drop-off and pick-up hours some congestion and queuing of vehicles will occur which is an existing condition at most if not all school sites regardless of enrollment levels. Traffic patterns related to drop-off and pick-up would be similar to traffic patterns experienced if these schools functioned at their planned enrollment capacity or at historic levels of high enrollment. School enrollment fluctuates and District enrollment records indicate that most of the schools to receive transfer students have in the past experienced enrollment levels at or in excess of that which will result from the transfer. Traffic conditions, therefore, would be similar to those experienced during prior school sessions of higher enrollment and would not be unusual in that respect. The City of Sacramento uses Level of Service D as an acceptable service for a threshold of significance and vehicle congestion is not anticipated to approach this level of service at or near signalized intersections by the school sites as a result of the proposed transfer of students.

XIII c) Change in Air Traffic Patterns. The proposed project will not result in any changes to air traffic patterns.

XIII d) Hazards Due to a Design Feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)? The proposed project does not involve any roadway design features (e.g., sharp curves or dangerous intersections) which would present new roadway hazards. All re-assigned students live in the Meadowview area south of Meadowview Road in a residential area.

XIII e) Emergency Access. Emergency access routes would not be affected by the project since the project does not change roadways or access routes.

XIII f) Conflict with adopted policies, plans, or programs regarding public transit, bicycle, or pedestrian facilities, or otherwise decrease the performance or safety of such facilities. John Still School which will receive transfer students is well served by sidewalks located on residential streets. Students would not be expected to cross a major arterial. Designated crosswalks are located along the length of John Still Drive where the school is located. These frequent crosswalks provide for safe pedestrian crossing areas at most residential streets connecting with John Still Drive.

CONCLUSION

The proposed project may result in different or new paths of travel from home to school for affected students. However, these changes are not expected to change the level of service on a roadway or cause significant new traffic issues. The John Still school site is well served by intersections with cross walks for pedestrian safety and has adequate off street drop off areas for parents who drive students. No significant traffic impacts such as substantial change in roadway or intersection level of service is expected to result from the proposed action.

XIV. UTILITIES AND PUBLIC SERVICES **Would the Project?**	**Potentially Significant Impact**	**Less than Significant Impact**	**No Impact**
Would the proposal result in the need for new systems or supplies, or substantial alterations to the following utilities or public services: A) Communication systems?			**X**
B) Local or regional water supplies?			**X**
C) Local or regional water treatment or distribution facilities?			**X**
D) Sewer or septic tanks?			**X**
E) Storm water drainage?			**X**
F) Solid waste disposal?			**X**
G) Fire and Police Protection?			**X**
H) Schools?			**X**
I) Maintenance of public facilities, including roads?			**X**
J) Other governmental services?			**X**
Would the Project Affect Utilities such as:			**X**
A) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?			**X**
B) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			**X**
C) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			**X**
D) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?			**X**
E) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?			**X**
F) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?			**X**
G) Comply with federal, state, and local statutes and regulations related to solid waste?			**X**

ENVIRONMENTAL SETTING

All affected school sites are located in urbanized areas with urban services by the City of Sacramento. Schools are existing developed schools with infrastructure, service and utilities installed in accordance with the capacity of the school.

STANDARDS OF SIGNIFICANCE

For purposes of this environmental document, an impact is considered significant if the proposed project would result in the need for new or altered services related to water, sewer, utilities, fire protection, police protection, school facilities, roadway maintenance, or other governmental services.

ANSWERS TO CHECKLIST QUESTIONS

XIV. a. through j. Public Services, Utilities and Facilities

A project would have a significant impact if it results in the new construction of facilities which require substantial new public services or would substantially alter existing services. This project does not involve the construction of new housing units, commercial or school facilities which would require additional public services. The project would transfer students from existing school sites to other existing school sites with capacity. All school sites receiving new students have public services and there are no indications that additional fire, police, school, water, sewer or other governmental services are needed to support the planned capacity of the school sites.

CONCLUSION. The project will have no significant or unusual *impact on public services.*

XV. RECREATION Issues:	Potentially Significant Impact	Less than Significant Impact	No Impact
Would the proposal: a) Increase the demand for neighborhood or regional parks or other recreational facilities?			X
b) Affect existing recreational opportunities?			X

XV a) Recreational Demand

The proposed project will not significantly increase population or housing in the area and as such would not increase demand for local recreation and park space.

XV b) Affect Existing Recreational Opportunities

Most of the affected school sites have a joint use agreement allowing both public and school use of open space areas. The proposed project would not change or alter these agreements. School sites to be closed would continue to be owned and maintained by the District until re-use proposals are considered by the Board of Education.

CONCLUSION. The project will not have any unusual or significant impact on recreational resources.

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

XVI a) Substantial effects to habitat, fish, wildlife, plant species or eliminate important examples of California History or Pre-History

The affected schools are located in urbanized areas of the County of Sacramento. No physical changes are proposed to the school sites and as such, the proposed project will not affect significant biological or cultural resources. None of the school sites are listed historic sites and none of the school sites are located in highly sensitive areas for subsurface archeological resources.

XVII b) Cumulative Effects

It is possible that this project will be undertaken in conjunction with two other proposed school closure projects. The three schools proposed to be closed within the District affect schools located in the south area of the City of Sacramento, and schools located in the Rancho Cordova area. Specifically, the District proposes to:

1. **Close A. M. Winn Elementary School.** The District proposes to close this school and divide attendance area between Abraham Lincoln Elementary School and James Marshall Elementary School. All three schools are located in the Rancho Cordova/Rosemont area of the school District in the 95827 zip code.

2. **Close Collis P. Huntington Elementary School.** The District proposes to close this school and divide attendance area between Woodbine Elementary School, H. W. Harkness School, and Hollywood Park School. These three schools are located in the South Area of the City of Sacramento in the 95822 zip code.

3. **Close Freeport Elementary School and Consolidate John Still Elementary and John Still Middle School.** The District proposes to close Freeport School and transfer students to the John Still school

site. This school site is comprised of a co-located elementary and middle school. With consolidation of the John Still grade levels to form a K-8 school, available capacity is created to accommodate Freeport School Students. Both of these schools are located in the Meadowview area of South Sacramento in the 95832 zip code.

In total, 954 students would be transferred to nearby school sites which have available capacity. Of these 350 students are located in the Rancho Cordova/Rosemont area and would attend schools nearby in that same area. The remaining 604 students generally reside in the south area of City of Sacramento and would attend schools which have available capacity that are located within 1 to 2 miles of their current school location. Table A summarizes these actions and the capacity available for transfer students.

TABLE A: SUMMARY OF CUMULATIVE OR RELATED ACTIONS

School to be Closed	Number of Students to be Transferred	Schools Students would be Transferred to	Available Capacity of Receiving Schools (Original capacity minus current enrollment)	Will Transfer Exceed Capacity of Receiving Schools?
A.M. Winn Elementary - 3351 Explorer Drive, Rancho Cordova, CA. 95827	350	Abraham Lincoln Elementary -3324 Glenmoor Drive, Rancho Cordova, CA, 95827	218	
		James Marshall Elementary - 9525 Goethe Road, Unincorporated land within the City of Rancho Cordova Sphere of Influence, 95827	717	
Combined Available Capacity of Receiving Schools for Winn Elementary			*935*	***No***
C.P. Huntington Elementary - 5921 - 26th Street, City of Sacramento, CA 95822	253	Hollywood Park Elementary - 4915 Harte Way, City of Sacramento, CA 95822	238	
		Woodbine Elementary - 2500 - 52nd Avenue, City of Sacramento 95822	245	
		Harkness Elementary - 2147 - 54th Avenue, City of Sacramento, CA 95822	297	
Combined Available Capacity of Receiving Schools for Huntington Elementary			*780*	***No***
Freeport Elementary - 2118 Meadowview Road, City of Sacramento, 95832	351	John Still Elementary School - 2200 John Still Drive, City of Sacramento, 95832	298	***No***
		John Still Middle School- 2250 John Still Drive, City of Sacramento, CA 95832	821	
Combined Available Capacity of Receiving Schools Freeport Elementary			*1119*	***No***

The cumulative impacts discussion for the project and related projects (also collectively referred to herein as the "project") is summarized below:

Aesthetics. The aesthetic environment and visual environment of all of the affected school sites would not be substantially changed in so far as no visible, physical changes to the school sites to receive transfer students would be required. School sites to be closed would continue to be maintained by the District, and no change in the physical layout of the schools is proposed by the actions which would obstruct a significant vista or view. None of the affected sites are located on a Scenic Highway. Since no aesthetic impacts are expected, no cumulative impacts are anticipated.

Agricultural and Forestry Resources. The proposed project in conjunction with other related school closure projects will have no direct or cumulative effect on agricultural or forestry resources. All affected

schools are located in existing urban and developed areas. None of the sites are located on soils considered Prime or of Statewide or Local importance on the California Farmland Mapping and Monitoring maps. None of the sites are located in forest lands or timber woods.

Air Quality. The Sacramento Metropolitan Air Quality Management District (SMAQMD) publishes screening criteria to determine if a proposed land use is likely to result in significant air quality effects which would require further analysis and mitigation. SMAQMD considers elementary schools with less than 2,320 students to be below the threshold for possible significant air quality effects. The Initial Studies prepared for each of the school closure actions concluded that none of the schools to receive transfer students would increase student enrollment beyond the capacity of the school or to an enrollment level which exceeded the 2,320 SMAQMD screening level for impacts. Thus, individually none of the actions result in significant air quality impacts. Cumulatively, there may be more vehicle related emissions during pick-up and drop-off of students at the schools to receive transfer students, however, the SMAQMD's screening criteria contemplated the level of vehicles which would likely exceed standards. Additionally, relative to the overall air basin, while there may be more vehicle trips to the new school site, there would also be a reduction in vehicle trips and emissions to the school sites to be closed. Overall, the minor level of changes in location of emissions does not exceed the screening threshold nor is it cumulatively considerable.

Biological Resources. The proposed project in conjunction with other related school closure projects will have no direct or cumulative effect on biological resources. All affected schools are located in existing urban and developed areas. None of the sites are located in areas of sensitive habitat, wetlands, or riparian areas. No trees will be removed and no physical disruption such as new construction on the sites is required to accomplish the project. The project would not contribute to cumulative habitat loss or cumulatively impact biological resources.

Cultural Resources. All school sites are located in existing developed areas and no subsurface excavation is required. As such, no impacts individually or cumulatively to sub-surface historic or archeological resources are anticipated. None of the school sites are listed as historic resources, and no physical changes to the sites such as alteration of significant structures are proposed as part of the action. Therefore, the proposed projects will not result in cumulative impacts to archeological or historic resources.

Geology and Soils. All school sites are developed facilities in existing developed and urbanized areas. All are located on level terrain. None of the sites are located on or near known geological unstable areas such as major faults. No individual or cumulative impacts to geologic or soils resources are anticipated.

Greenhouse Gas Emissions. All affected school sites are located in the Sacramento Valley Air Basin which is under the jurisdiction of the Sacramento Metropolitan Air Quality Management District (SMAQMD). The SMAQMD has not developed screening levels for GHG emissions from projects in Sacramento County. The District CEQA Guide (as revised 2011) assumes that projects described in CEQA's categorical and statutory exemption provisions (Articles 18 and 19 of the California Code of Regulations, Title 14) would not interfere with achieving emission reductions from new projects subject to CEQA. The District also assumes that GHG emissions from residential and commercial projects that are described in the categorical exemption language appear to be relatively small from a GHG perspective and are also considered less-than–cumulatively considerable. The proposed projects individually and cumulatively will not induce new growth and development, or result in new facilities which would emit greenhouse gases. (See also Air Quality Discussion above).

Hazards and Hazardous Materials. The initial studies prepared for each of the three school closures found that there were no significant impacts related to hazards or hazardous materials. All of the affected schools in the City of Sacramento are located in Zone X of FEMA's Flood Insurance Risk Maps. This zone

applies to areas which are generally protected by levees. Students, who will be transferred to new sites in the South Area of Sacramento, would continue to go to schools with the same flood designation, and thus no cumulative risk of exposing more students to a higher risk of flood is expected. Similarly, students in the Rosemont/Rancho Cordova area will be transferred to schools with the same flood designation. C.P. Huntington to be closed and Woodbine and Hollywood Park Elementary Schools, which are proposed to receive transfer students, are all located within the Community Land Use Plan (CLUP) area of Executive Airport. All are located within the "overflight" safety zone. This zone considers existing schools to be compatible uses. C.P. Huntington is the closest school to Executive Airport, thus, if Huntington students area transferred to Woodbine and Hollywood Elementary Schools, they would continue to attend schools in the "overflight" zone but the newly assigned schools are slightly further from the actual airport. Similarly, A.M. Winn, James Marshall and Abraham Lincoln Elementary Schools are all located in the "overflight" zone of the Mather Airport Community Land Use Plan (CLUP). Since all school sites are in the same safety zone there would be no change in the relative safety of these students. Neither Freeport nor John Still school sites are located in an airport planning area. No increased risk of exposure to hazardous materials or airport hazards is expected to result individually or cumulatively as a result of the projects.

Hydrology and Water Quality. All school sites are served by urban water systems which were designed to serve the school at capacity. None of the sites are located in or adjacent to wetlands, open waters, or streams. No changes to the facilities of the schools sites to receive transfer students is required, as such there are no physical effects which would individually or cumulatively affect hydrology or water quality resources.

Land Use Planning. All school sites conform to the General Plan designation of the jurisdiction in which they are located. No new facilities are required to accommodate the transfer of students and as such no cumulative growth and development would be induced by the projects.

Mineral Resources. None of the proposed projects would result in the extraction of minerals. All sites are existing school sites which do not require expansion to accommodate transfer students. No cumulative impacts to mineral resources are expected.

Population and Housing. No new facilities are required to accommodate the transfer of students and as such no cumulative growth and development would be induced by the projects. No housing will be displaced as a result of the projects. Therefore, there are no cumulative population or housing impacts associated with the projects.

Public Services. All affected school sites are located in existing developed areas with municipal services extended to the sites based on the capacity of the school site. Since the transfer of students will not exceed the capacity of the schools, no individual or cumulative effects to public services are anticipated.

Recreation. The proposed actions would accommodate existing students of the District in nearby schools with capacity. As such, no new populations requiring recreational services are generated by the proposals. All school sites have joint use agreements for school and park use and the affected schools are located adjacent to open play field and park space. Joint use agreements with schools proposed to be closed would continue until the Board of Education considers any site re-use proposals. No individual or cumulative effects are anticipated by the project.

Transportation. Based on the Initial Studies prepared for each of the school closure proposals, there are no unusual or significant transportation impacts related to the projects. Level of Service D is the accepted level of service in the City and County of Sacramento and the City of Rancho Cordova and is the standard of significance for traffic impacts. This level of service accepts that congestion and traffic delays would occur. It is reasonable to assume that traffic near the school sites for student drop-off and pick up would be similar to the type of traffic congestion when the school site operated at higher enrollment levels or at

capacity. Relative to total vehicle trips, while school sites to receive transfer students may experience increased vehicle trips these trips, there would be a similar reduction in vehicle trips to school sites to be closed. All school sites to receive transfer students are located within 1 to 2 miles of the school site to be closed. On a cumulative and regional basis, the proposed projects are not expected to result in cumulatively considerable impacts.

Utilities and Service Systems. All affected school sites are located in existing developed areas with existing utility services extended to the sites based on the capacity of the school site. Since the transfer of students will not exceed the capacity of the schools, no individual or cumulative effects to utilities and service systems are anticipated.

Conclusion Regarding Cumulative Effects. Based on the above discussion, the proposed project in conjunction with related projects will not have any cumulatively considerable effects.

XVII b) Substantial Adverse Effects on Human Beings, either directly or indirectly? The proposed projects are not located on or near a hazardous material sites. All schools which are located within and Airport Community Planning Area are located in an "overflight" safety zone which considers existing schools to be a compatible use. No students would be transferred from one school site to another which has an increased airport safety risk or an increased flood zone risk based on the safety zones of the adopted Airport Community Land Use Plan covering the sites, and FEMA flood designations. All school sites are located in areas in which the noise environment is less than 65 CNEL. In this respect, the proposed project (s) will not increase major hazardous risks which could affect human beings. As a result of the proposed project, the home to school commute patterns of some students and families will change. For some, the commute pattern will be shorter or approximate to the current commute for others the commute may be longer. The average commute for most students from their existing school to the proposed new school would be less than 1 to 2 miles depending on the location of the student's residence. Some students if they walk to school will need to learn new routes where safe intersections with signals and crosswalks exist. While these effects may in some cases cause inconvenience, they do not cause a substantial adverse effect on human beings.

Determination

Initial Studies have been prepared for each of the proposed school closures listed above. Based on these studies and this cumulative analysis, the proposed projects will not individually or cumulatively result in significant environmental impacts. As such, it is determined that the projects both individually and cumulative qualify for an exemption from further analysis of CEQA under California Environmental Quality Act (CEQA) Statutes § 21080.18 and the 2011 State CEQA Guidelines §15314.

Section 15315 of the State CEQA Guidelines provides that minor additions to schools are an exempt class of activities. Specifically this section states: "Class 14 consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25% or ten classrooms, whichever is less. The addition of portable classrooms is included in this exemption." In addition, Section 15282 of the CEQA Guidelines provides a statutory exemption for "the closing of any public school or the transfer of students from that public school to another school in which kindergarten or any grades 1 through 12 is maintained" if the only physical changes involved are categorically exempt under Chapter 3 (commencing with Section 15000) of Division 6 of Title 14 of the California Administrative Code.

All three proposed school closures and transfers of students meet the criteria for a statutory exemption and also meet the criteria for a Class 14 of the categorical exemption. As such, the proposed projects are exempt *unless* the projects meet any of the following exceptions to the exemption criteria stated in 15300.2. of the 2011 CEQA Guidelines. This Section of the Guidelines excepts projects which would otherwise be exempt from CEQA if a project would meet any of the following criteria:

(a) Location. Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.

Determination. The proposed project is a Class 14 exemption which is not included among the classes of exemption covered by this section of the CEQA Guidelines. As such, this section is not applicable to these projects. In addition none of the proposed actions would impact an environmental resource of concern officially adopted pursuant to law by federal, state or local agencies.

(b) Cumulative Impact. All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.

Determination. An analysis of the cumulative impact of all three projects has been prepared (see Cumulative Impact Analysis above) which determined that the project along with other similar projects is not anticipated to pose significant impacts over time.

(c) Significant Effect. A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.

Determination. Initial Studies have been prepared for all three proposed projects which determined that none of the projects would individually or cumulatively exceed established thresholds of significance or result in significant environmental impacts due to unusual circumstances.

(d) Scenic Highways. A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to

improvements which are required as mitigation by an adopted negative declaration or certified EIR.

Determination. Initial Studies have been prepared for all three proposed projects which determined that none of the projects would individually or cumulatively damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. All affected school sites are located in existing developed areas. No trees would be removed, none of the school sites are listed historic buildings and none of the sites are located on or near a designated scenic highway.

(e) Hazardous Waste Sites. A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.

Determination. None of the affected school sites are located on lands included on any list compiled by Section 65962.5 of the Government Code.

(f) Historical Resources. A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.

Determination. None of the affected school sites are listed as an historic site or within a potential or listed historic district. Additionally, the proposed project will not require any physical alterations of the sites. Therefore, the projects will not cause a substantial adverse change in the significance of a historical resource.

Based on the above findings, the following Discussion is made:

X	I find that the proposed project qualifies for an Exemption from CEQA under Section 21080.18 of the CEQA Statutes and further that the proposed project will not have a significant effect on the environment based on the prevailing and accepted standards of significance.
	I find that the Proposed Project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
	I find that although the Proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because the project-specific mitigation measures described in Section III have been added to the project. A MITIGATED NEGATIVE DECLARATION will be prepared.
	I find that the Proposed Project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

Trish Davey — 2/14/2012

Signature — Date

Trish Davey,
Planning Dynamics Group