SACRAMENTO CITY UNIFIED SCHOOL DISTRICT
BOARD OF EDUCATION

Agenda Item# 9.2

Meeting Date: February 21, 2013

Subject: **District Right-Sizing: Closure of Under-Enrolled School Facilities (Resolution No. 2734)**

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

Division: Superintendent's Office

Recommendation: Receive updated information on the Superintendent's recommendation to "right-size" our District by closing our most under-enrolled schools and Approve Resolution No. 2734: Closure of Under-Enrolled School Facilities.

Background/Rationale: With few exceptions, SCUSD elementary schools are substantially under-enrolled per their capacity. Districtwide, SCUSD elementary enrollment stands at 56% of capacity. This model is not fiscally sustainable and drains resources from other students and schools.

Enrollment for the 2012-13 school year is down approximately 800 students. Preliminary projections for 2013-14 portend a similar trend.

Under-enrolled schools result in more split-grade classes (i.e., 2nd and 3rd grade students in the same classroom due to insufficient enrollment numbers for individual grade-level instruction), concapping (the movement of students to other schools to accommodate class size constraints) and – most importantly - fewer resources for students, staffs and families.

At the January 17 Board meeting, the Superintendent recommended the proposed closure of the following schools based on the most severely under-enrolled elementary schools: Fruit Ridge, James W. Marshall, Washington, Tahoe, Collis P. Huntington, Susan B. Anthony, Bret Harte, Joseph Bonnheim, Mark Hopkins, Clayton B. Wire, and Maple elementary schools. Resolution No. 2734 includes the closure of 10 of these schools, with a vote on Tahoe Elementary scheduled for March 7 in order to consider the closure of Mark Twain Elementary as a possible alternative.

Additional information at the Board meeting will include a report on updated safety and transportation plans for the schools slated for closure as well as amendments to the previous recommendations of receiving schools. The determination under CEQA is that the school closures qualify for an exemption under Public Resources Code 21080.18 and CEQA Guideline 15314.

Frequently asked questions (FAQs) regarding the recommended school closures are posted at http://www.scusd.edu/post/frequently-asked-questions-2.

Closure of these sites would be effective for the 2013-14 school year.

Financial Considerations: Despite the passage of Proposition 30, the District expects to once again be confronted with a substantial deficit for the 2013-14 school year caused by rising costs and declining enrollment. Due to substantial cuts in recent years to certificated and classified employees such as teachers, counselors, custodians, plant managers, librarians, school nurses and assistant principals, central office staff and cuts to programs like home-to-school transportation and adult education, no more viable options exist to balance our budget.

Failure to submit a balanced budget to the Sacramento County Office of Education would result in a "negative certification", which is a financial rating that will expose the District to the risk of a state takeover. A "negative certification" would also adversely affect the marketing and sale of bonds approved as Measures Q & R. It would quite possibly reduce the number of potential investors and increase the interest rate that the District would pay for the bonds. Additionally, the District will end the year in a negative cash position if we are unable to issue Tax Revenue Anticipation Notes (TRANs). The Sacramento County Office of Education (SCOE) must review our financial situation and offer assurance that the District will be in a financial position to repay the Notes. If SCOE cannot provide that assurance, the District's budget will be negative as of June 30, 2013. The closure of all 11 schools recommended by the Superintendent is projected to save the District approximately $2.5M per year in ongoing savings.

Documents Attached: Resolution No. 2734 and Environmental Screening and CEQA Determination for Sacramento City Unified School District's 2013 Proposals to Close School Sites and Transfer Students to Designated School Sites and Related Actions.

Estimated Time of Presentation: 30 minutes
Submitted by: Jonathan P. Raymond, Superintendent

SACRAMENTO CITY UNIFIED SCHOOL DISTRICT
BOARD OF EDUCATION

RESOLUTION NO. 2734

RESOLUTION RE CLOSURE OF UNDER-ENROLLED SCHOOL FACILITIES

WHEREAS, the Board of Education of the Sacramento City Unified School District ("Board") has received documents and heard oral presentations, including presentations by staff regarding the recommended closures of school facilities at its regular meetings on January 17, February 7, and February 21; and

WHEREAS, the recommended closures of school facilities are described in Attachment A and incorporated herein by this reference (collectively, the "School Closures"); and

WHEREAS, community meetings were held at each of the school sites for the proposed School Closures; and

WHEREAS, the proposed School Closures will enhance, Districtwide, the quality of the curricula and educational programs which are currently dispersed over a number of under-enrolled schools to the detriment of the learning environment and supports for all students of the Sacramento City Unified School District ("District"); and

WHEREAS, the proposed School Closures serve to reduce the ongoing costs of keeping open under-utilized facilities and allows cost savings to be redirected in support of the District's educational programs as well as to help close the current deficit gap caused by state funding cuts, declining enrollment, and the loss of one-time federal funds and rising costs; and

WHEREAS, the California Environmental Quality Act (Pub. Resources Code § 21000, et seq.; "CEQA") does not apply to the closing of any public school in grades K-12 if the physical changes involved are "categorically exempt" from CEQA review; and

WHEREAS, the CEQA Guidelines (Title 14 Cal. Code of Regulations §15000 et seq.; "Guidelines") exempts projects which are determined by the Guidelines not to have a significant effect on the environment, including a categorical exemption for additions to existing schools receiving students which do not increase original student capacity at the receiving schools by more than 25% or ten classrooms, whichever is less, for each School Closure; and

WHEREAS, the District's enrollment, over the past decade, has continued to decline, including a declining student population at its elementary schools as documented for the school facilities described in the list of School Closures; and

WHEREAS, all of the School Closures are "categorically exempt" from CEQA review under Guideline 15314 and the Board finds the closures will not have a cumulative impact or a significant effect on the environment due to unusual circumstances.

NOW, THEREFORE, BE IT RESOLVED that the Sacramento City Unified School District Board of Education hereby finds and determines, based on the oral presentations and documents submitted to the Board, as follows:

1. Adopts the foregoing recitals as true and correct and incorporates all determinations and findings therein by this reference.

2. Finds that the School Closures are "categorically exempt" from the provisions of CEQA pursuant to Public Resources Code section 21080.18 and section 15314 of the Guidelines.

3. Finds that it is in the best interests of the Sacramento City Unified School District, in the allocation and use of its educational resources, and the most efficient use of its reduced financial resources, to close the school facilities ("School Closures") as described in Attachment A, commencing the 2013-14 school year.

4. Finds that the transfer recommendations for the students from the schools to be closed as described in Attachment A, including all traffic and transportation safety measures recommended by the Superintendent, are appropriate and necessary.

5. Directs the Superintendent to carry out all student transfers to the receiving schools as recommended by the Superintendent, including all traffic and transportation safety measures recommended by the Superintendent to the Board.

6. Further directs the Superintendent to take such further action as necessary to carry out this Resolution.

PASSED AND ADOPTED by the Sacramento City Unified School District Board of Education on this 21st day of February, 2013, by the following vote:

AYES: ____
NOES: ____
ABSTAIN: ____
ABSENT: ____

_____
Jeff Cuneo
President of the Board of Education

ATTESTED TO:

_____
Jonathan P. Raymond
Secretary of the Board of Education

ATTACHMENT A
TO RESOLUTION NO. 2734

1. Fruit Ridge Elementary School
2. James W. Marshall Elementary School
3. Washington Elementary School
4. Collis P. Huntington Elementary School
5. Susan B. Anthony Elementary School
6. Bret Harte Elementary School
7. Joseph Bonnheim Elementary School
8. Mark Hopkins Elementary School
9. Clayton B. Wire Elementary School
10. Maple Elementary School

Environmental Screening and CEQA Determination for Sacramento City Unified School District's 2013 Proposals to Close School Sites and Transfer Students to Designated School Sites 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. Also, school closures are analyzed pursuant to Public Resources Code 21080.18 and the CEQA Guidelines described below.

BACKGROUND

The Sacramento City Unified School District (District) has for more than a decade been confronted with declining enrollment in the District overall as a result of demographics which affect the State overall (declining birthrates and smaller family sizes) and the fact that the District serves a developed metropolitan area with only modest growth in new housing. For example, in 2001, the District enrollment was 53, 418 students compared to 47,939 students in 2012 (See Figure 1).

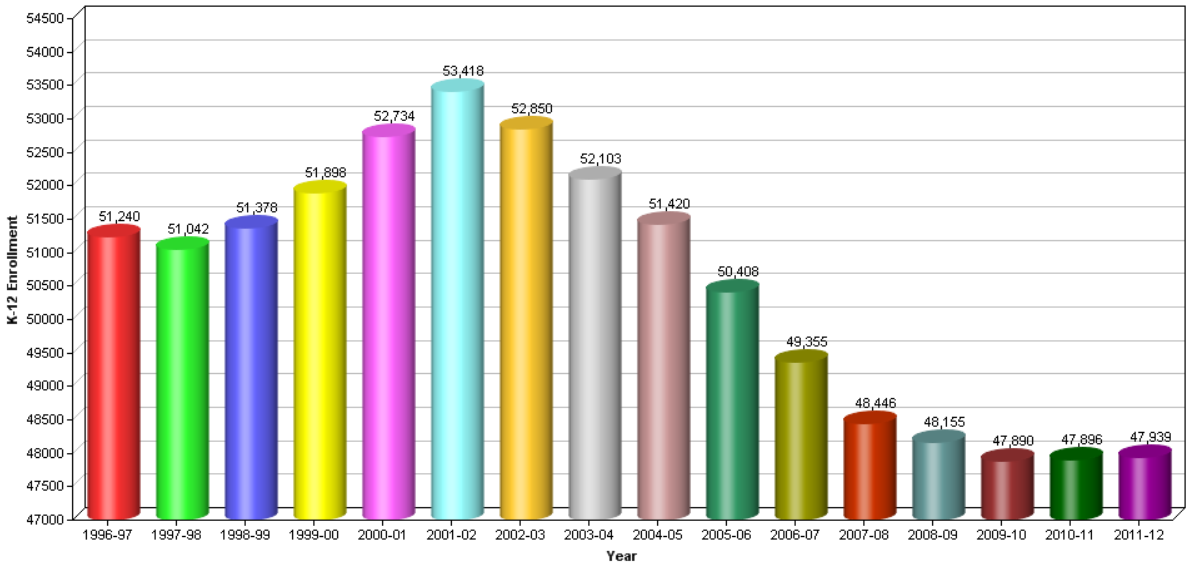

FIGURE 1: District Enrollment (Source: Data Quest, California Department of Education)

This trend coupled with the decline in local tax revenues due to the recession and stagnation of housing values, and cutbacks in State funding, have created severe budget challenges. Among these challenges is the need to make more cost effective and efficient use of facilities to ensure that funds are spent for education rather than administration and maintenance of facilities which have relatively low use.

As a result, a task force of District personnel met and reviewed the usage of school sites. The initial main criterion used by the group was the percentage of occupancy at each school site. In many cases, school sites are using less than half of the capacity of the site due to declining enrollment. After identifying the sites with the lowest occupancy, the group determined which sites were located in near proximity to other school sites with available capacity. Based on this, the District staff is proposing that several school sites be considered for closure. For each closure, nearby schools were identified with capacity to receive transfer students from the sites to be closed. (See also District Right Sizing Staff Report presented to the Board of Education in January 2013).

SUMMARY OF THE PROPOSED PROJECT

The proposed project includes the closure of up to ten elementary school sites and the transfer of those students to nearby schools with capacity. Additionally, the project includes the institution of certain transportation and safety programs in specific circumstances to ensure student safety and in some instances the addition of portable classrooms to accommodate grade levels and classroom size requirements as described below.

The schools proposed to be closed are described as the project as follows:

Central City

1. **Washington Elementary School**. Close facility and divide attendance area between Theodore Judah and William Land Elementary Schools. Families to the west of railroad tracks between 19th Street and 20th Street would go to William Land Elementary School and families to the east of railroad tracks between 19th Street and 20th Street would go to Theodore Judah Elementary School. Transportation will be provided for displaced students going to both Theodore Judah Elementary School and William Land Elementary School so that students will avoid busy Central City streets, railroad tracks and Business 80. In consultation with Sacramento Police Department, crossing guards or walking attendants will be made available if necessary. Applications from current Washington Elementary School students to attend other schools will be given priority during the district's Open Enrollment period.

East Broadway and Fruitridge Area Schools

2. **Bret Harte Elementary School.** Close facility and divide attendance area between Father Keith B. Kenny and Ethel Phillips Elementary Schools. (See Figure 3). It is proposed that students living north of Sutterville Road and east of Highway 99 be assigned to Ethel Phillips Elementary School. Transportation is proposed to be provided to these students. Students living to the west of Highway 99 would be assigned to Father K.B. Kenny K-8 School In consultation with Sacramento Police Department, crossing guard or walking attendant will be made available if necessary. Applications from current Bret Harte Elementary School students to attend other schools will be given priority during the district's Open Enrollment period.

3. **Maple Elementary School**. Close facility and transfer students to Ethel Phillips Elementary School. Transportation is proposed to be provided for these students so that students do not have to walk along or cross Franklin Boulevard, a major arterial. In consultation with Sacramento Police Department, crossing guards or walking attendants will be made available if necessary. Applications from current Maple Elementary School students to attend other schools will be given priority during the district's Open Enrollment period.

4. **Fruit Ridge Elementary School**. Close facility and transfer students to Oak Ridge Elementary School. Transportation will be provided to students assigned to Oak Ridge Elementary School. In consultation with Sacramento Police Department, crossing guards or walking attendants will be made available if necessary. Applications from current Fruit Ridge Elementary School students to attend other schools will be given priority during the district's Open Enrollment period.

5. **Clayton B. Wire Elementary School.** Close facility and divide attendance area between Ethel Baker and Pacific Elementary Schools. Students who live within C. B. Wire's contiguous boundary who live west of Sampson Boulevard will go to Pacific Elementary School; students to the east of Sampson Boulevard would be assigned to Ethel I. Baker Elementary School. Both of which are within close proximity to C.B. Wire Elementary School and the assignment to these schools will not require students to cross major arterials or railroad track. In consultation with Sacramento Police Department, crossing guards or walking attendants will be made available if necessary. C.B. Wire Elementary School students living within the non-contiguous portion of the boundary will be assigned to Elder Creek Elementary School. In consultation with Sacramento Police Department, crossing guards or walking attendants will be made available if necessary for displaced students who cross Elder Creek Road to attend Elder Creek Elementary School. Applications from current C.B. Wire Elementary School students to attend other schools will be given priority during the district's Open Enrollment period.

6. **Collis P. Huntington Elementary School.** Close facility and assign students to H.W. Harkness and Hollywood Park Elementary Schools. Students in the northern portion of the Collis P. Huntington Elementary School boundary would be assigned to Hollywood Park Elementary School. Students in the southern portion would be assigned to H. W. Harkness Elementary School. Transportation will be added for displaced students assigned to both Hollywood Park and H. W. Harkness Elementary schools. In consultation with Sacramento Police Department, crossing guards or walking attendants will be made available if necessary. Depending on the number of children enrolled by grade level, one portable may be necessary to accommodate all students at their grade level. Applications from current Collis P. Huntington Elementary School students to attend other schools will be given priority during the district's Open Enrollment period. (See Figure 7).

7. **Joseph Bonnheim Elementary School**. Close facility and transfer students to Earl Warren and Peter Burnett Elementary Schools. It is proposed that students living south of 21st Avenue would be assigned to Earl Warren Elementary School. This school is within close proximity and would not require the crossing of a major arterials or railroad tracks. Students living north of 21st Avenue are proposed to be assigned to Peter Burnett Elementary School. Transportation will be provided to these students to prevent students crossing the Western Pacific Railroad tracks, 65th Expressway and Fruitridge Road. In consultation with Sacramento Police Department, crossing guards or walking attendants will be made available if necessary. Applications from current Joseph Bonnheim Elementary School students to attend other schools will be given priority during the district's Open Enrollment period. (See Figure 8).

South Area

8. **Mark Hopkins Elementary School**. Close facility and divide attendance area between John Bidwell and John Sloat Elementary Schools. John Bidwell and John Sloat Elementary Schools are both within close proximity and neither requires the crossing of a major street or railroad track. In consultation with Sacramento Police Department, walking attendants will be made available if necessary. Applications from current Mark Hopkins Elementary School students to attend other schools will be given priority during the district's Open Enrollment period. See Figure 9).

9. **Susan B. Anthony Elementary School**. Close facility and transfer students to the Edward Kemble and Cesar Chavez Elementary Schools. Transportation is proposed for displaced students going to Edward Kemble and Cesar Chavez Elementary Schools. In consultation with Sacramento Police Department, crossing guards or walking attendants will be made available if necessary. In order to accommodate students at the Edward Kemble and Cesar Chavez Elementary Schools, including the Hmong Immersion

Program, it is proposed that approximately 6 portables be added to this site. Applications from current Susan B. Anthony Elementary School students to attend other schools will be given priority during the district's Open Enrollment period. (See Figure 10).

Rosemont Area

10. **James Marshall Elementary School**. Close facility and divide attendance area between A.M. Winn, Sequoia and Golden Empire Elementary Schools. Students living to the west of Mayhew Road and north of Rosemont Drive would be assigned to Sequoia Elementary School; families to the east of Mayhew Road and generally north of Mirandy Drive would be assigned to A. M. Winn Elementary School. Transportation will be added for displaced students from James Marshall Elementary School who must cross Bradshaw Road to get to A.M. Winn Elementary School. Students living south of Mirandy Drive would be assigned to Golden Empire Elementary School. James Marshall Elementary School students assigned to Golden Empire Elementary School would also be offered transportation. In consultation with Sacramento County Department of Transportation, crossing guards or walking attendants will be made available if necessary. Applications from current James Marshall Elementary School students to attend other schools will be given priority during the district's Open Enrollment period. These schools are located in the Rancho Cordova/Rosemont area of the school District. (See Figure 11).

All of the affected school sites have experienced some decline in enrollment relative to capacity and historic enrollment patterns. A chart of the enrollment levels over the last 16 years schools is shown in the Appendices.

Transportation Actions

Part of the proposed project is the allocation of funding to support transportation (bus, van service or equivalent service), walking attendants or cross guards to ensure safe passage of students to and from their school sites in specific instances where safety is a concern. The recommended actions included as part of this project are:

Busing or Transportation Services for Displaced Students.

Washington Elementary School Students. Current students will be offered transportation to their new location. Students assigned to Theodore Judah Elementary School will be offered transportation in order to prevent safety issues in crossing Business 80 and side arterials. Similarly, those students assigned to William Land Elementary School will also be offered transportation to address safety issues in crossing major arterials such as J Street, P Street, Q Street and light rail crossings.

Bret Harte Elementary School Students assigned to Ethel Phillips Elementary School. It is proposed that current students living north of Sutterville Road and east of Highway 99 be assigned to Ethel Phillips Elementary School. Transportation is proposed to be provided to these students.

Maple Elementary School assigned to Ethel Phillips School. Current students will be offered transportation to their new location since there are no through residential streets between Maple Elementary School and Ethel Phillips Elementary School except Franklin Boulevard, a major arterial.

Fruit Ridge Elementary School Assigned to Oak Ridge Elementary School. **Current** Fruit Ridge Elementary **School** students assigned to Oak Ridge Elementary School are proposed to be transported to their new school.

Joseph Bonnheim Elementary School Students Assigned to Peter Burnett Elementary School. Current students will be offered transportation to Peter Burnett Elementary School to ensure safer crossing of 65th Expressway and Fruitridge Road.

Collis P. Huntington Elementary School Students Assigned to H. W. Harkness School and Hollywood Park Elementary Schools. Current students will be offered transportation to H. W. Harkness Elementary School to address safety issues of 24th Street and 47th Avenues. Similarly, transportation will be offered to current students assigned to Hollywood Park Elementary School to address safety issues of crossing Fruitridge Road.

Susan B. Anthony Elementary School Students Assigned to Edward Kemble and Cesar Chavez Elementary Schools. Current students will be offered transportation to Edward Kemble and Cesar Chavez Elementary Schools to ensure safe crossing of Meadowview Road.

James Marshall Elementary School Students Assigned to A.M. Winn and Golden Empire Elementary Schools. Current students who must cross Bradshaw Road will be offered transportation to A.M. Winn Elementary School and to those students assigned to Golden Empire Elementary School who would have to cross Keifer Boulevard.

Other Actions to Improve Safety

The project may also include the addition of crossing guards, walking attendants or improved loading and unloading zones if necessary as specified in the school by school project description above. If necessary, crossing guards will be available at all receiving school sites to facilitate safe access to the school site. Recommended safe routes to schools are being prepared for all sites and will be distributed to affected families.

Planned Minor Changes to Receiving School Sites

Based on anticipated transfer students by grade level, some receiving school sites are proposed to have minor physical alterations. Planned minor alterations include:

- Installation of one (1) portable classroom at William Land Elementary School site and installation of two (2) portable classrooms at Theodore Judah Elementary School site to avoid the need to split classes.

- Installation of one (1) portable at classroom at Harkness Elementary School site.

- Installation of six (6) portable classrooms at Edward Kemble Elementary School site to accommodate class sizes and the Hmong Immersion program.

- Modify the interior walls of two modular building at Ethel Baker Elementary School site to create 4 regular sized classrooms out of 6 small rooms.

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."

The original student capacity of the school refers to the design capacity of the school facility which is based on the number of classrooms available on site prior to the transfer. In the District, there are approved collective bargaining agreements regarding classroom size which specify a reduced number of students per classroom than would normally be allowed under design capacity. For purposes of this analysis, design capacity is based on the capacity allowed by the collective bargaining agreements which is a capacity number less than design capacity, but provides a more realistic assessment of student capacity.

Table 1 presents the analysis of the closures and transfers and compares the resulting enrollment to the school student capacity. In all cases the proposed project does not increase the student capacity more than 25% nor are would there be more than ten classrooms added to a single school site to accommodate the transfer students.

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

School Proposed to Be Closed	2012-2013 Enrollment	Receiving Schools	2012-2013 Enrollment	Total Capacity*	Space Available	New Enrollment Exceed Capacity?
Bret Harte	402	Fr. KB Kenny	313	802	489	
		Ethel Phillips	439	819	380	
Maple	232	Ethel Phillips	439	819	383	
Fruit Ridge	310	Oak Ridge	416	1017	601	
Sub-Total Broadway/ Fruitridge Area Students	*1259*	*Sub-Total*	*1168*	*2638*	*1473*	
		After Transfer	***2112***	***2638***	***526***	***No***
Clayton B Wire	454	Ethel Baker	608	1021	413	
		Pacific	551	924	373	
		Elder Creek	746	1318	572	
		Sub-Total	*1905*	*3263*	*1358*	
		After Transfer	***2359***	***3263***	***904***	***No***
Collis P. Huntington	237	Hollywood Park	259	526	267	
		Harkness	318	675	357	
		Sub-Total	*577*	*1201*	*624*	
		After Transfer	***814***	***1201***	***387***	***No***
Joseph Bonnheim	413	Earl Warren	493	921	428	
		Peter Burnett	541	1125	584	
		Sub-Total	*1034*	*2046*	*1012*	
		After Transfer	***1447***	***2046***	***599***	***No***
Mark Hopkins	416	John Bidwell	390	725	335	
		John Sloat	310	595	285	
		Sub-Total	*700*	*1320*	*620*	
		After Transfer	*1118*	*1320*	*202*	***No***

School Proposed to Be Closed	2012-2013 Enrollment	Receiving Schools	2012-2013 Enrollment	Total Capacity*	Space Available	New Enrollment Exceed Capacity?
Susan B. Anthony	279	Kemble	527	815	288	
		Chavez	331	604	273	
		Sub-Total	*858*	*1419*	*561*	
		After Transfer	***1137***	***1419***	***282***	***No***
Washington	222	Theodore Judah	500	859	359	
		William Land	290	641	351	
		Sub-Total	*790*	*1500*	*710*	
		After Transfer	***1012***	***1500***	***488***	***No***
James W. Marshall	390	AM Winn	338	876	538	
		Sequoia	509	752	243	
		Golden Empire	606	813	207	
		Sub-Total	*1453*	*2441*	*988*	
		After Transfer	***1843***	***2441***	***598***	***No***

* Capacity is determined by multiplying the number of classrooms on site by the classroom size set under the District's collective bargaining agreements. In all cases, the collective bargaining agreements restrict class size to that which would be less than might be allowed by a square footage calculation. Therefore, the actual physical capacity of the school sites is greater than that used for this assessment.

Historic Enrollment for Receiving School Sites
1996-2012

School	1996-1997	1997-1998	1998-1999	1999-2000	2000-2001	2001-2002	2002-2003	2003-2004	2004-2005	2005-2006	2006-2007	2007-2008	2008-2009	2009-2010	2010-2011	2011-2012	Yearly Average
E. Phillips	570	620	572	551	583	564	552	530	516	486	466	478	465	424	421	413	513
Fr. K.B. Kenny	647	632	616	620	607	571	536	451	483	454	382	365	343	312	273	306	475
Oakridge	660	646	685	720	649	586	544	526	512	469	478	442	459	459	427	415	542
Mark Twain	523	585	629	573	576	557	538	513	480	447	435	441	437	425	422	403	499
E. Baker	730	688	691	672	713	761	757	739	686	647	573	661	679	697	665	671	689
Pacific	675	608	647	668	700	725	692	653	586	546	543	631	599	564	569	522	621
Elder Creek	703	692	680	709	769	779	789	776	768	758	727	690	700	706	692	700	727
Harkness	501	495	389	346	367	431	413	327	432	304	293	274	301	311	309	329	364
Hollywood Park	440	437	409	400	348	365	358	402	377	358	361	360	337	334	320	291	369
Earl Warren	501	469	495	501	511	502	530	539	534	498	481	489	501	470	521	524	504
Peter Burnett	716	688	695	715	747	721	706	679	631	627	594	561	538	562	560	588	646
John Bidwell	408	386	392	399	411	417	410	375	402	384	390	370	387	395	378	348	391
John Sloat	368	340	352	362	372	348	341	309	312	304	337	330	336	344	349	311	338
Kemble	765	781	760	779	822	558	533	517	535	532	525	548	494	489	475	512	602
Chavez	0	0	0	0	397	397	390	400	406	385	375	364	343	300	302	301	363
T. Judah	583	509	509	519	480	542	522	415	331	290	260	277	319	375	405	454	424
W. Land	401	396	358	365	391	356	381	351	337	322	301	295	289	276	289	282	337
Sequoia	526	511	536	519	549	558	537	557	514	501	488	498	471	492	493	512	516
A.M. Winn	539	537	471	486	488	490	549	512	517	507	473	476	492	498	492	375	494
Golden Empire	723	699	654	619	617	582	573	569	580	568	558	543	549	586	614	647	605
	Source: California Department of Education, Data Quest, accessed January 23, 2013																

PROCESS FOR SCREENING FOR PHYSICAL OR ENVIRONMENTAL IMPACTS

Even though the project technically qualifies for an exemption from CEQA, the District has elected to conduct a preliminary environmental study of the proposed project. 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.
- County of Sacramento Zoning Code. 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.
- City of Rancho Cordova General Plan and Final EIR for the General Plan adopted by the Rancho Cordova City Council, June 26, 2006. Sacramento, CA.
- Rancho Cordova Municipal Code, Title 23, Zoning Code, Article 3 – Zoning Districts, Allowable Uses and General Development Standards, Effective February 20, 2009; Updated October 19, 2011. 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.

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 applicable threshold for significance for roadway level of service in the jurisdiction in which the receiving schools are located.

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 one of the receiving schools 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." The project includes the placement of portable classrooms at four receiving school sites. In all cases the number of portable classrooms added to the receiving school site does not exceed 10 classrooms. One school site will require interior wall modifications to create four regular sized classrooms out of six small rooms. All of these modifications fall within the Class 14 exemption which 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.

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 south, central and eastern areas 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 local 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. It is proposed that new portable classrooms be provided at Harkness, Kemble, William Land and Theodore Judah Elementary schools. One (1) portable is proposed at Harkness School. This school has previously had portables which were removed due to declining enrollment at the school. The new portables will allow for appropriate classroom sizes. Approximately 6 portables are proposed for Kemble Elementary School to accommodate Hmong Immersion Program and the anticipated students by grade level. In addition, similarly portables are proposed at Theodore Judah and William Land schools to ensure that all grade levels can be accommodated without split classes.

ASSESSMENT AND FINDINGS

I a) Views, Vistas and Visual Resources

Significant scenic resources in the Sacramento Area include the major rivers and parkways such as the American River Parkway and unimproved creek corridors, parks and significant view corridors of the State Capitol as governed by the adopted Capitol View Ordinance. 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. None of the school sites are located in an area identified as a significant visual resource area on the respect General Plans. Therefore, there are no designated view corridors or vistas which would be affected by proposed actions.

I b) Visual Character

The only physical change to the exterior of the school sites is the addition of portable classrooms. Portable classrooms are a common feature at nearly all affected school sites. It is not anticipated that the addition

of portable classrooms would result in any significant change in the visual character of the school campuses.

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. Three roadways are proposed by the County for scenic designation in the County's recently (2011) amended General Plan. These are: Scott Road from White Rock Road south to Latrobe Road, Latrobe Road and Michigan Bar 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, it no impact to scenic resources is 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))?			
d)	Result in the loss of forest land or conversion of forest land to non-forest use?			
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 City of Rancho Cordova or urbanized areas of the County 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 1. 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 1: 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 (Figure 2, Williamson Act Contract of the County of Sacramento General Plan Agricultural Element, adopted as amended November 9, 2011). Additionally, none of the affected sites are designated by zoning or the General Plans of the City of Sacramento, the County of Sacramento or City of Rancho Cordova 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 2
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 not result 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

III. a) and b) Air Quality Standards

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 operational screening tables to determine if a proposed project is anticipated to exceed any of the air quality thresholds. Table 2 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 3
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?
A.M. Winn Elementary School	876	Elementary school with less than 2,320 students	No
Cesar Chavez Elementary School	604	Elementary school with less than 2,320 students	No

TABLE 3 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?**
Edward Kemble Elementary School	815	Elementary school with less than 2,320 students	No
Earl Warren Elementary School	921	Elementary school with less than 2,320 students	No
Elder Creek Elementary School	1318	Elementary school with less than 2,320 students	No
Ethel I. Baker Elementary School	1021	Elementary school with less than 2,320 students	No
Ethel Phillips Elementary School	819	Elementary school with less than 2,320 students	No
Fr. K.B. Kenny K-8 School	802	Middle school with less than 2,120 students	No
H.W. Harkness Elementary School	675	Elementary school with less than 2,320 students	No
Hollywood Park Elementary School	526	Elementary school with less than 2,320 students	No
John Bidwell Elementary School	390	Elementary school with less than 2,320 students	No
John Sloat Elementary School	310	Elementary school with less than 2,320 students	No
Oak Ridge Elementary School	1017	Elementary school with less than 2,320 students	No
Pacific Elementary School	924	Elementary school with less than 2,320 students	No
Sequoia Elementary School	752	Elementary school with less than 2,320 students	No
Golden Empire Elementary School	813	Elementary school with less than 2,320 students	No
Theo. Judah Elementary School	859	Elementary school with less than 2,320 students	No
William Land Elementary School	641	Elementary school with less than 2,320 students	No
** Based on enrollment at school capacity which is an enrollment larger than anticipated by the proposed project.			

Short Term, Construction Period Emissions. Minimal construction is proposed as part of this project. Construction activities will involve interior reconfiguration of walls at Ethel Baker School. One large classroom area will be converted from 6 small sized rooms to 4 more standard classrooms. At Kemble Elementary six (6) portables on raised foundations are proposed which will involve minimal grading and construction air quality effects. One (1) portable is proposed at Harkness Elementary, one (1) at William Land Elementary and two (2) at T. Judah Elementary for a total of 10 portables proposed at all sites. Each portable is prefabricated and would have a footprint of approximately 500 to 1000 square feet. The total square footage then to be graded would be approximately 0.25 acres of soil disturbance assuming all portable installations require grading. The SMAQMD CEQA Guide December 2009 includes construction period screening tables to determine if a proposed project is anticipated to exceed any of the air quality thresholds. SMAQMD sets screening criteria for Elementary, Junior High and High Schools that states that construction period emissions for a facility less than 1,307,000 square feet would not exceed air quality thresholds. The proposed project including all proposed portable facilities is less than the screening criteria. As such, no significant construction period effects are anticipated.

III. c) Cumulative Air Quality Impacts

Since the proposed project does not exceed SMAQMD thresholds of significance it is not anticipated that any minor air quality impacts would be cumulatively considerable.

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.

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. Ornamental landscaping consists of areas supporting introduced or non-native trees, shrubs, flowers, and turf grass. Ornamental landscaping occurs in green belts, parks, and horticultural plantings. 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) and the County of Sacramento General Plan (2011) EIR provides a map of known sensitive habitat areas which support special status species. All of the affected 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, the County of Sacramento General Plan (2011) or the City of Rancho Cordova General Plan. 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. 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. Portions of unincorporated County (Fruitridge Pocket) and the City of Rancho Cordova are located in the study area for the proposed South Sacramento Habitat Conservation Plan (SSHCP). This plan is not yet adopted, however, since the proposed project involves re-assigning students attending existing developed schools in existing developed areas, it is not anticipated that this project would conflict with the proposed SSHCP. 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.

Similarly, the County of Sacramento's General Plan includes a cultural resources sensitivity map (Sacramento County General Plan, Figure 12) which similarly shows that river and creek corridors having greater sensitivity than other areas.

Historic Resources and Landmarks

Recognized historic resources are those listed on the Federal Register or identified by State or local registers. The City of Sacramento publishes the Sacramento Register of Historic & Cultural Resources (December 2011) which includes a listing of local, State and National designated historic resources. The majority of historic districts are located in the older sections of the community. Two schools proposed to be closed are located within or adjacent to historic districts. These are Washington School which is located in the Washington School Historic District and William Land School which is located adjacent to but outside the Southside Historic District. Neither of these schools are listed as contributing resources to the district or otherwise individually listed. For example, Washington School which is proposed to be closed, was originally constructed in 1916, but was demolished and replaced since the original building did not meet safety standards. As a result, a new school was constructed in 1976. In consultation with the City of Sacramento's Preservation Officer, this school is not a contributing historic resource to the District and as such closure of the school would not result in a significant physical change to the District. William Land School is located outside of the Southside District. Similar to Washington School, the original William Land School structure was replaced in 1976 to address safety concerns. None of the other schools are located within or immediately adjacent to any historic districts. 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 4: 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. Similarly the installation of portable classrooms is governed by the building code. No unusual soils risks have been identified.

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[1]:

- 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

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

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.

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. The project does include busing for several of the school sites which may reduce the number of individual vehicle trips and may have a more positive effect on greenhouse emissions.

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

ENVIRONMENTAL SETTING

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. Mather Airport is a designated Federal Superfund site, however, it is located more than a mile away from any of the Rancho Cordova/Rosemont schools. This site is under agreement to remediate the site.

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. Four of the affected school sites are located within the Executive Airport Community Land Use Plan (EACLUP) and two other sites are located in the Mather Airport Community Land Use Plan (MACLUP). Both of these plans designate three safety areas: the "clear" zone, the "approach-departure" zone, and the "overflight" zone. The clear zone is near the end of the runway and is the most restrictive. Clear zone areas are based upon the Runway Protection Zone established by the Federal Aviation Administration. The approach-departure zone is located under the takeoff and landing slopes and is less restrictive. The "overflight" zone is the area under the traffic pattern and is even less restrictive. The dimensions of the safety areas were determined by evaluating FAA safety zone dimensions, by analyzing historical aircraft accident data and by evaluating safety zone dimensions that encompass significant hazard areas. Both the Executive Airport and Mather Airport CLUPs designate schools as a compatible use within the "overflight" zone, but are not compatible in the "clear" zone or the "approach-departure" zones.

Schools within the EACLUP planning area are C.P. Huntington (proposed to be closed) and Harkness, Hollywood Park and John Bidwell Elementary schools. These schools are located in the "overflight" zone

of Executive Airport and based on the CLUP. Schools are considered a compatible use within the "overflight" zone

Schools within the MACLUP are A.M. Winn and James Marshall Elementary schools. These schools are located in the "overflight" zone of Mather Airport and based on the CLUP such uses are considered compatible with the "overflight" safety zone. Golden Empire and Sequoia Schools are located outside the "over flight" zone and are not covered by the MACLUP.

Since the existing schools are compatible with the Safety Zone designation of the applicable Community Airport Land Use Plan, the proposed project would not conflict with any adopted airport safety plans.

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. 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 would involve only minimal construction work to install portable classrooms on raised foundations or modification of interior walls. It is not anticipated that this will result in significant run-off or construction period water quality effects.

VIII. g, h, and i. Flood Risks

The Sacramento area is a flood prone area. However, none of the affected school sites are located in a flood plain area which is not 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). 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 are located in the County of Sacramento and fall under the land use jurisdiction of the City of Sacramento, the City of Rancho Cordova or the County of Sacramento depending on the location of the school site. The Table 5 below summarizes the jurisdiction and applicable General Plan and zoning designation for each of the affected school sites.

TABLE 5: General Plan and Zoning Designations for Affected School Sites

Schools Affected	Planning Jurisdiction	Applicable General Plan	Designation	Zoning	Public School Use Compatible?
SCHOOLS PROPOSED FOR CLOSURE					
Bret Harte Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
Clayton B. Wire Elementary School	County of Sacramento	County of Sacramento General Plan	"Low Density Residential"	RD-5	YES
C.P. Huntington Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1-EA-4	YES
Fruit Ridge Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
James W. Marshall Elementary School	County of Sacramento	County of Sacramento General Plan and Rancho Cordova Community Plan	"Low Density Residential"	RD-5	YES
Joseph Bonnheim Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-3A	YES
Maple Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1-EA-4	YES

TABLE 5: General Plan and Zoning Designations for Affected School Sites					
Schools Affected	**Planning Jurisdiction**	**Applicable General Plan**	**Designation**	**Zoning**	**Public School Use Compatible?**
Mark Hopkins Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
Susan B. Anthony Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
Washington Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-3A	YES
RECEIVING SCHOOLS					
A.M. Winn Elementary School	City of Rancho Cordova	City of Rancho Cordova General Plan	"Public/Quasi Public"	RD-5	YES
Cesar Chavez Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
Edward Kemble Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
Earl Warren Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
Elder Creek Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
Ethel I. Baker Elementary School	County of Sacramento	County of Sacramento General Plan	"Low Density Residential"	RD-5	YES
Ethel Phillips Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
Fr. K.B. Kenny Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
H.W. Harkness Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1-EA-4	YES
Hollywood Park Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1-EA-4	YES
John Bidwell Elementary	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1-EA-4	YES
John Sloat Elementary	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
Peter Burnett Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
Oak Ridge Elementary School	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES

TABLE 5: General Plan and Zoning Designations for Affected School Sites					
Schools Affected	**Planning Jurisdiction**	**Applicable General Plan**	**Designation**	**Zoning**	**Public School Use Compatible?**
Pacific Elementary School	County of Sacramento	County of Sacramento General Plan	"Low Density Residential"	RD-5	YES
Sequoia Elementary School	County of Sacramento	County of Sacramento General Plan	"Low Density Residential"	RD-5	YES
Golden Empire Elementary School	County of Sacramento	County of Sacramento General Plan	"Low Density Residential"	RD-5	YES
Theo. Judah Elementary	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1	YES
William Land Elementary	City of Sacramento	City of Sacramento General Plan	"Public/Quasi Public"	R-1B	YES

General Plans Applicable to the Subject Sites. The General Plan is the master plan for land uses adopted by the local planning jurisdiction in accordance with State Planning and Zoning Law. The three applicable General Plans include:

- City of Sacramento 2030 General Plan, adopted March 3, 2009, as amended.
- City of Rancho Cordova General Plan adopted on June 26, 2006, as amended.
- County of Sacramento 2030 General Plan, adopted November 9, 2011, as amended.

The City of Sacramento General Plan and Zoning. For all school sites within the City of Sacramento, the City's General Plan designates the subject 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 sites listed in Table 6 within the City of Sacramento are consistent with the City of Sacramento General Plan designation.

C.P. Huntington, Maple, Hollywood Park, H.W. Harkness and John Bidwell school sites are zoned by the City of Sacramento as "R-1-EA-4". The City of Sacramento Zoning Title 17, the Comprehensive Zoning Plan of the City of Sacramento defines this zone as: "This is a very low density residential zone. It is intended to be applied primarily to areas impacted by high noise levels, within designated approach or clear zones around

airports, within identified floodway and floodway fringe areas, and other areas where physical and/or safety considerations necessitate very low density residential use. This zoning district shall be designated as "RE" with the maximum permitted units per acre as a suffix (i.e., RE-1/4, RE-1/2, RE-1/1, RE-1/5)." Schools are considered an existing non-conforming use by the City of Sacramento within these zones and such uses may continue, however, the development of new schools or physical expansion of existing schools would be subject to discretionary approval. In this case Hollywood Park, Harkness and John Bidwell schools are proposed to receive transfer students; however, this action would not increase enrollment levels at the school beyond the pre-existing capacity or historic enrollment levels. One portable would be relocated to Harkness Elementary School to accommodate anticipated student population grade levels and appropriate classroom size.

William Land Elementary School is zoned R-1-B. This is a medium density housing zone described by the City of Sacramento Zoning Code as "a residential zone generally located inside the central city and in North Natomas which allows single-family units by right and two-family units subject to special permit approval. The lots are generally existing so there is no minimum lot size or density. However, lots smaller than forty (40) feet by eighty (80) feet generally present design restrictions. Approximate density for the R-1B zone is up to twelve (12) dwelling units per acre."

All other affected schools within the City of Sacramento 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.

The City of Rancho Cordova General Plan and Zoning. A.M. Winn Elementary School is the only site located within the City of Rancho Cordova. The City of Rancho Cordova General Plan designates the subject site as "Public/Quasi Public". The City's General Plan describes this designation as follows:

> "The Public/Quasi-Public category covers a variety of public and other land uses, including land owned by the City and other public agencies. Possible uses include civic buildings; schools, colleges, and universities; religious institutions; hospitals; museums; cemeteries; and others. Most buildings in this category are high profile and prominent within the community. In order to meet future community needs, new development projects should include public/quasi-public sites for future, undetermined uses."

Public 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 site is consistent with the City of Rancho Cordoba General Plan designation. A.M. Winn Elementary schools are zoned[2] by the City of Rancho Cordoba as "RD-5 Zoning District." The City's Zoning Ordinance describes this district as follows: "this district makes up the vast majority of residential development built in the City prior to incorporation. The zone allows for residential development in the 4.1 to 5.0 dwelling units per acre range, as well as other compatible neighborhood support facilities and public/quasi-public uses, such as parks, religious institutions, and community gathering facilities." Public schools are a permitted use in this zone.

[2] Rancho Cordova Municipal Code, Title 23, Zoning Code, Article 3 – Zoning Districts, Allowable Uses and General Development Standards, Effective February 20, 2009; Updated October 19, 2011

The County of Sacramento General Plan. Pacific Elementary School, Sequoia Elementary School, Golden Empire Elementary School, Clayton B. Wire Elementary School, James W. Marshall Elementary School and Ethel I. Baker Elementary School are all located in the unincorporated area of the County and are subject to the County of Sacramento General Plan. The County General Plan designates all these school sites as "Low Density Residential". This designation is described as follows:

> "This designation provides for areas of predominantly single family housing with some attached housing units. It allows urban densities between one and twelve dwelling units per acre, resulting in population densities ranging from approximately 2.5 to 30 persons per acre. Typical low density development includes detached single family homes, duplexes, triplexes, fourplexes, townhouses, lower density condominiums, cluster housing, and mobile home parks."

Although public school use is not explicitly listed in the uses for this designation, it is specifically allowed in the underlying zoning for the sites which is RD-5. The Zoning Code of the County of Sacramento states that: "RD-5 is a low density residential zone which "provides for areas of predominantly single family housing with some attached housing units. It allows urban densities between one and twelve dwelling units per acre, resulting in population densities ranging from approximately 2.5 to 30 persons per acre. Typical low density development includes detached single family homes, duplexes, triplexes, fourplexes, townhouses, lower density condominiums, cluster housing, and mobile home parks. Public elementary schools are a permitted use in this zone."

ASSESSMENT AND FINDINGS

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 schools proposed to be closed would attend a school a nearby school with capacity.

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. Affected schools in the unincorporated portions of the County (Fruitridge Pocket and Rosemont Area) and those in the City of Rancho Cordova are located in the study area for the proposed South Sacramento Habitat Conservation Plan (SSHCP). This plan is not yet adopted. However, these schools are existing facilities in existing developed areas, it is not anticipated that the proposed project would conflict with any of the proposed policies of the SSHCP. The project will have no impact on HCPs or other conservation plans.

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. School sites in the Rosemont area, James Marshall, and A.M. Winn Elementary Schools, are however, located in an area with known mineral resources. The City of Rancho Cordoba's General Plan, Natural Resources Element Policy NR.6.3 states that: "While mining activities are anticipated to be phased out within the City, the City recognizes the right of these uses to continue and will require setbacks, buffers, screening, and other appropriate measures to allow for the continued operation of mining activities."

ASSESSMENT AND FINDINGS

X. a and b Mineral Resources

As noted above, with the exception of the Rosemont area schools (James Marshall, and A.M. Winn Elementary Schools), none of the school sites are located in an area of known mineral resources. The Rosemont schools are currently located in areas underlain by mineral resources, however, as developed school sites within existing developed areas, school operations on these sites will not change the availability of mineral resources and it is unlikely that new surface mining operations would be approved within and existing developed area. Schools within the City of Sacramento are located in areas where mineral resources may exist but the significance cannot be evaluated in large part to the presence of urban development on the surface. (Figure 6.4-1, Mineral Resource Zones, City of Sacramento General Plan Background Report, 2009). Since none of the affected schools are located on or adjacent to areas of active mining and all school sites are existing developed areas, no significant impact to mineral resources is anticipated to occur as a result of transferring students from one school site to another.

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 subject schools are located in three planning jurisdictions which have the following standards in their adopted General Plans relative to noise exposure and school sites:

TABLE 6: APPLICABLE NOISE COMPATIBILITY STANDARDS			
Noise Element Standards/ By Type of Noise	**County of Sacramento General Plan Noise Element**	**City of Rancho Cordoba General Plan Noise Element**	**City of Sacramento General Plan Noise Element**
Transportation Noise Exposure for School Sites (Roadways and Railroads)	Outdoor 65 Ldn Interior 40 Ldn *Applicable to New Uses Only*	Outdoor: None Interior: 45 CNEL, Ldn or dB	Maximum 70 CNEL
Airport Noise Exposure Standards for School Sites	60-65 CNEL acceptable 65-70 CNEL acceptable if interior level is 45 dB. Above 70 CNEL is unacceptable.	Same as County	Same as County

The sound environment varies from school site to school site and maybe influenced by the proximity of the site to major transportation corridors, rail corridors and airports. The schools to receive transfer students and their existing noise environment include:

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 (City of Sacramento, General Plan, Appendix D; Noise Contours, 2009). The community noise environment for each affected school site located in the City of Sacramento is summarized below. (Only schools remaining open or receiving new students were analyzed).

Edward Kemble and Cesar Chavez Elementary Schools. These two sites are located adjacent to one another. Major transportation noise sources in the vicinity of these sites include: 24th Street, 68th Street, Meadowview Road and the UPRR Tracks and light rail lines which run approximately 0.22 miles to the east of the site. 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 70 CNEL.

Ethel Baker Elementary School. Major transportation noise sources in the vicinity of this site include: Franklin Boulevard and Highway 99. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this site falls within the 60 to 65 CNEL contour for all noise transportation noise sources. Therefore, this site has and will continue to be in an area where the CNEL is 65 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 70 CNEL.

Earl Warren Elementary School. Major transportation noise sources in the vicinity of this site include: Fruitridge Road, Power Inn Road and 65th Expressway. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this site falls 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 70 CNEL.

Elder Creek Elementary School. Major transportation noise sources in the vicinity of this site include: Power Inn Road and Lemon Hill Road. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this falls 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 70 CNEL.

Father K.B. Kenny Elementary School. Major transportation noise sources which might affect this site include noise from the following streets Broadway, Martin Luther King, Jr. Boulevard, and 12th/14th Avenue. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this site is outside the 60 CNEL contour for noise from these streets. The site is located with easy access to State Highway 99 and Highway 50 but is located outside of the 60 CNEL contour for this site. 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.

Oak Ridge Elementary School. Major transportation noise sources in the vicinity of this site include: Martin Luther King Boulevard and Highway 99. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this site falls 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 70 CNEL.

Peter Burnett Elementary School. Major transportation noise sources in the vicinity of this site include: Stockton Boulevard and Fruitridge Road. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this site falls 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 70 CNEL.

William Land Elementary School. Major transportation sources in the vicinity of this site include: Business 80 and local streets in the Central City. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this site falls 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 70 CNEL.

Theodore Judah Elementary School. Major transportation sources in the vicinity of this site include: Business 80 and McKinley Boulevard. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this site falls 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 70 CNEL.

H.W. Harkness Elementary School. The closest transportation related noise sources to this site include Executive Airport, the Union Pacific (UP) Railroad tracks and 24th Street and Florin Road. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this site is outside the 60 CNEL contour for all transportation noise sources. Additionally, the Executive Airport Community Land Use Noise Contour Map indicates that this site is located in area which experiences 65 CNEL or less. Therefore, this site has and will continue to be in an area where the CNEL is 65 dB or less 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.

Hollywood Park Elementary School. The closest transportation related noise sources to this site include Executive Airport, Fruitridge Road, and Freeport Boulevard. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this site is outside the 60 CNEL contour for all transportation noise sources. Additionally, the Executive Airport Community Land Use Plan (CLUP) Noise Contour Map indicates that this site is located in area which experiences 65 CNEL or less. Therefore, this site has and will continue to be in an area where the CNEL is 65 dB or less 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.

John Sloat Elementary School. Major transportation sources in the vicinity of this site include Freeport Boulevard and Meadowview Road. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this site falls 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 70 CNEL.

John Bidwell Elementary School. Major transportation sources in the vicinity of this site include Florin Road and Freeport Boulevard. The Noise Contours prepared for the City of Sacramento 2030 General Plan show that this site falls 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 70 CNEL.

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

The City of Rancho Cordoba General Plan does not specify an exterior noise standard for schools but does specify and interior noise standard of 45 dB. The City's General Plan does specify an exterior noise standard of 70 dB for playgrounds, which is used in this study as an exterior noise standard. A.M. Winn Elementary School is located is located in the City of Rancho Cordoba. Major sources of noise which could affect this site include US 50 which runs approximately 0.33 miles to the north of the site, Routier Road located approximately 0.32 miles to the east of the site and Mather Airport located approximately 0.5 miles to the south of the site. The Mather Airport Community Land Use Plan Noise Contours map indicates the site is within the 60 to 65 CNEL contour of the airport. The County of Sacramento General Plan Environmental Impact Report (Appendix E, Noise Tables) summarize the noise from major transportation sources in the County. For the section of Routier Road from Folsom Boulevard to Old Placerville Road, noise diminishes to 65 dB at approximately 138 feet from the roadway centerline. Since the subject site is located 0.33 miles to the east of Routier Road, the noise effect from this roadway on the school site is less than 65 dB. Similarly, the County of Sacramento General Plan Environmental Impact Report (Appendix E, Noise Tables) estimate that for the portion of US 50 between Bradshaw Road and Mather Field Road, noise diminishes to 65 dB approximately 1,015 feet from the roadway centerline. As such noise from US to is not anticipated to exceed 65 dB at this site.

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

The County of Sacramento's General Plan sets a noise exposure standard of 65 Ldn for exterior noise and 40 Ldn for interior noise from transportation sources. Although these standards are applicable to new school sites under the County's General Plan, it is used in this study as a guideline to assess the noise environment of the affected existing school site. The affected school sites in the unincorporated area which will receive new students are: Ethel I Baker Elementary, Pacific Elementary, Sequoia Elementary, and Golden Empire Elementary.

Ethel I. Baker and Pacific Elementary Schools are shown on the City of Sacramento's Noise Contour maps because of their proximity to the City limits. Ethel I Baker is located south of Fruitridge Road and is located in the 60 CNEL or less contour which is consistent with the County's exterior noise standard or 65 Ldn. Pacific School is located near Highway 99 and 47th Avenues. The site falls outside the 60 CNEL contour for 47th Avenue and portions of the site fall within the 60-65 CNEL contour for Highway 99. Both these schools therefore have an exterior noise environment will is consistent with the County General Plan standard for schools.

Sequoia Elementary School in the Rosemont area is located in a residential neighborhood and there are no major arterials in close proximity to the site which would generate noise levels in excess of 65 Ldn. Similarly, Golden Empire School is located approximately 0.25 miles from Watt Avenue, Jackson Highway and Keifer Boulevard. As such noise exposure from these sources is not anticipated to exceed the County's General Plan standards for schools.

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.

ASSESSMENT AND FINDINGS

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

Based on the analysis included in the environmental setting section above, none of the affected schools sites are located in areas which are subject to noise from major transportation sources which would exceed the established threshold of the Noise Element of the General Plan in which the school site is located.

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 drop off and pick up 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 substantial 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

Six of the affected school sites are located within the Community Land Use Plan area of an airport. Four schools, C.P. Huntington Elementary School (proposed for closure), H.W. Harkness Elementary, Hollywood Park Elementary and a portion of John Bidwell Elementary are located within the Community Land Use Plan (CLUP) area of Executive Airport. The Executive Airport Community Land Use Plan (CLUP), Land Use Compatibility Guidelines state that schools are an acceptable use without condition in areas which experience less than 65 dB from airport operations. All four of the above schools are located outside of Executive Airport's 65 CNEL noise contour.

A.M. Winn and James Marshall Elementary schools are located within the Community Land Use Plan area of Mather Airport. The Mather Community Land Use Plan (CLUP), Land Use Compatibility Guidelines state that schools are an acceptable use without condition in areas which experience less than 65 CNEL from airport operations. A.M. Winn and James Marshall schools are located outside of the 65 CNEL noise contour on the Mather Airport CLUP. All three of the affected schools in the Rancho Cordoba/Rosemont area are located outside of Mather 65 dB noise contour. 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.

ASSESSMENT AND FINDINGS

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

The proposed project would involve the closure of ten (10) elementary schools, and the transfer of students to nearby school sites. 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.

Table 7 summarizes the distance between the school sites to be closed and the school sites where students will be re-assigned or transferred.

Table 7: Distance Between Schools						
School Site Proposed to be Closed	**School Sites Proposed to Receive Students and Distance (Miles) from Site to Be Closed**					
Bret Harte Elementary	Ethel Phillips Elementary	1.1	Fr. K.B. Kenny	1.1		
Clayton B. Wire	Ethel Baker Elementary	1.0	Pacific Elementary	0.65	Elder Creek Elementary	2.2
C.P. Huntington Elementary	Hollywood Park Elementary	1.2	H. W. Harkness Elementary	1.5		
Fruit Ridge Elementary	Oak Ridge Elementary	0.7				
James Marshall Elementary	Sequoia Elementary	1.2	A.M. Winn Elementary	1.8	Golden Empire Elementary	2.1
Joseph Bonnheim Elementary	Earl Warren	0.9	Peter Burnett	1.7		
Maple Elementary	Ethel Phillips Elementary	1.1				
Mark Hopkins Elementary	John Sloat Elementary	0.9	John Bidwell Elementary	1.1		
Susan B. Anthony Elementary	Cesar Chavez Elementary	1.5	Kemble Elementary	1.3		
Washington Elementary	William Land Elementary	1.8	Theodore Judah Elementary	3.7		
	Blue shading at receiving school indicates facilities where transportation will be provided for current students.					

Maps included in the Appendix show the assignment areas for each of the receiving schools. In preparing the proposal for the school closures the District staff met with representatives of the City and County Transportation Departments to identify any traffic or transportation concerns. The District's Safety Coordinator also developed recommended safe routes to each receiving school in consultation with safety professional such as the City Police Department. In some instances, students would be assigned to a nearby school which would require crossing a major arterial, railroad track or freeway. In these instances, the proposal includes busing for displaced students.

Busing is proposed for the following transfer students:

- Bret Harte Elementary School Students assigned to Ethel Phillips Elementary School. These students would be transported to prevent students from trying to cross Sutterville Road, a busy arterial. Bret Harte Elementary School students assigned to Father K. B. Kenny K-8 School all live on the east side of Highway 99 and generally north of 14th Avenue. Thus, the students would no longer be required to use the overpass to cross Highway 99, but rather would use residential streets to their new school.

- Maple Elementary School Students assigned to Ethel Phillips Elementary School. Maple Elementary School students would also receive transportation service since there are no through residential streets between the schools and students would therefore need to take Franklin Boulevard a busy arterial. Transportation for Maple and Bret Harte Elementary School students to Ethel Phillips Elementary School will also reduce vehicle congestion at drop off and pick up times.

- Collis .P. Huntington Elementary School Students. Students from Collis P. Huntington Elementary School will be assigned to Hollywood Park and H. W. Harkness Elementary Schools. Transportation will be provided to current students to reduce the likelihood of students traveling along or across Fruitridge Road, 24th Street and 47th Avenue, all of which are busy arterials or major collector streets.

- Fruit Ridge Elementary School Students. Current students will be assigned to Oak Ridge Elementary School and will be offered transportation for student safety and to alleviate congestion along Martin Luther King Jr. Boulevard during pick up and drop off times.

- James Marshall Elementary School Students assigned to A.M. Winn and Golden Empire Elementary Schools. Current students will be transported due to the distance between schools and major arterials such as Bradshaw Road and Keifer Boulevard.

- Joseph Bonnheim Elementary School Students assigned to Peter Burnett Elementary School. Transportation will be provided for current students due to the distance between the schools and major arterials such as Fruitridge Road and 65th Expressway between schools.

- Susan B. Anthony Elementary School Students assigned to Edward Kemble and Cesar Chavez Elementary Schools. Transportation will be provided for current students due to the distance between the schools and to address safety issues related to students walking across Meadowview Road, a major arterial.

- Washington Elementary School Students assigned to William Land and Theodore Judah Elementary Schools. Current students will be transported to address safety concerns related to busy central city streets, railroad tracks and for those students assigned to Theodore Judah Elementary School, safety issues with crossing under Business 80.

The remaining schools were screened to review if there are any major arterials, freeways, or railroads that students would have to cross which would necessitate bus service for safety. The schools which are not listed above with bus service are located in residential areas with reasonable pedestrian amenities (sidewalks, crosswalks).

As noted in the project description, all receiving schools will have crossing guards at the school site to ensure safe access to the school. Crossing guards or walking attendants are also proposed for students from C.B. Wire Elementary School who will be assigned to Ethel I. Baker and Pacific Elementary Schools. A crossing guard or walking attendant is proposed to be assigned to C.B. Wire Elementary School students who would be transferred to Elder Creek Elementary School to ensure these students safely cross Elder Creek Road. A walking attendant is also proposed for Joseph Bonnheim Elementary School students assigned to Earl Warren Elementary School. Crossing guards or walking attendants are also proposed for students from Mark Hopkins Elementary School who will be assigned to John Bidwell and John Sloat Elementary Schools.

The District also forms "Transition Teams" when students are assigned to a new school. These teams are comprised of the principal, teacher, parents, administrators and others and the purpose is to address and concerns such as recommended routes to schools and procedures for pick-up and drop off.

ASSESSMENT AND FINDINGS

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. Representatives of the City of Sacramento and County of Sacramento Transportation Departments were contacted regarding the school closures. As a result of these consultations no changes in level of service along roadways is expected as a result of the school closures.

XIII c) Change in Air Traffic Patterns. The proposed project will not result in any changes to air traffic patterns. Schools located near airports are compatible with the adopted Airport Community Land Use Plan for the airport. (See also Hazards and Hazardous Materials checklist section).

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. Some re-assigned school students will take new routes to schools, and other re-assigned students will be offered busing to schools if the new school site would require the student to cross major arterials, freeways or railroad tracks. The District will also form "Transition Teams" to review safe walking routes. These walking routes were developed in consultation with the City and County Transportation Departments and identify safe intersections (signal or four-way stop), areas with sidewalk and crosswalks.

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. As a result of the transfer of students some changes in ridership on Regional Transit buses or light rail may result from the proposed project. Most schools have bike lane routes and all schools have pedestrian routes with crosswalks in the vicinity of the school.

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. Families and students will need to work with the District Transition Teams to understand the safest route to school from their home for the student. Busing will be provided in all cases where the transferred student would be required to cross major arterials, freeways or railroad tracks.

XIV. UTILITIES AND PUBLIC SERVICES **Would the Project?**	**Potentially Significant Impact**	**Less than Significant 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?			
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**

ENVIRONMENTAL SETTING

All affected school sites are located in urbanized areas with urban services. 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.

ASSESSMENT AND FINDINGS

XIV. a. through j. Public Services 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**

ASSESSMENT AND FINDINGS

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 solicited and received. Therefore, minimal impact to existing recreational opportunities is expected.

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 and none of the school sites are located in or near areas with significant biological or cultural resources. None of the school sites are listed historic sites.

XVII b) Cumulative Effects

Cumulative effects refer to effects of the proposed project when combined with other related projects. The proposed project would result in the closure of 10 schools if all components of the proposed project are adopted. An estimated total of 3,357 students from the 10 schools to be closed would be re-assigned to nearby schools. In the last 10 years, due to declining enrollment, the District has closed eight (8) K-12 schools and 3 adult education facilities. Similarly, Elk Grove School District and San Juan School District have confronted declining enrollment and have closed or consolidated schools. School closures are increasingly frequent in California due to declining birth rates and out-migration.

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 with the exception of the addition of a total of 10 portable classrooms at four of the receiving school sites. Portable classrooms are a common visual feature of nearly all schools in the District and as such this change would not be an unusual visual or aesthetic effect. 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 was applied to the total capacity of the school sites which is greater than the anticipated enrollment at the sites. 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 and a reduction in vehicle related emissions through increased availability of school buses. 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 are located in areas of the City of Sacramento which are protected by levees. Students, who will be transferred to new sites the District, would continue to go to schools with the same flood risk designation, and thus no cumulative risk of exposing more students to a higher risk of flood is expected. Harkness, Hollywood Park and James Bidwell 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 "over flight" safety zone. This zone considers existing schools to be compatible uses. Similarly, A.M. Winn School which will receive transfer students from James Marshall School is located in the "over flight" zone of the Mather Airport Community Land Use Plan (CLUP). This zone considers existing schools to be compatible uses. No increased risk of exposure to hazardous materials or recognized hazardous sites 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 and there are no significant changes to the school sites designated to receive students. No significant or unusual individual or cumulative effects hydrology or water quality resources have been identified.

Land Use Planning. All school sites conform to the General Plan designation of the jurisdiction in which they are located. No new permanent 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. 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. 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 materials site. All schools which are located within and Airport Community Planning Area are located in an "over flight" 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 flood zone risk based the 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

An Initial Study has been prepared covering the ten proposed school closures and related actions. 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 State CEQA Guideline §15314.

Section 15314 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 ten of the 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. None of the closures would increase student population by 25% or 10 classrooms at any receiving school site. 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 CEQA Guidelines. This Section of the CEQA 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 10 proposed school closures 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. A CEQA Initial Study checklist conforming to CEQA Guidelines has been prepared covering the ten proposed school closures, and the minor addition of portable classrooms as well as transportation safety actions. The Initial Study checklist 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 affected school sites 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 only one school site is located within a listed historic district. Washington School proposed to be closed is located in the Washington School Historic District. In consultation with the City of Sacramento Preservation Office, it was determined in the Initial Study that closure of this school would not affect the Historic District insofar as the school structure was constructed in the mid-1970's and is not a contributing structure to the Historic District. 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 PRC Section 21080.18 and CEQA Guideline 15314 and further that the proposed project and its components 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 — Signature

Feb 15, 2013 — Date

Trish Davey,
Planning Dynamics Group