

**DRAFT**

**INITIAL STUDY/  
MITIGATED NEGATIVE DECLARATION**

**VENTURE CHARTER ATHLETIC FIELD PROJECT  
STOCKTON, SAN JOAQUIN COUNTY, CALIFORNIA**

June 2023

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**INITIAL STUDY/  
MITIGATED NEGATIVE DECLARATION**

**VENTURE CHARTER ATHLETIC FIELD**

Submitted to:

San Joaquin County Office of Education  
2292 Transworld Drive  
Stockton, CA 95206

Prepared by:

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916-930-0736

June 2023

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## TABLE OF CONTENTS

TABLE OF CONTENTS .....	i
FIGURES AND TABLES .....	ii
LIST OF ABBREVIATIONS AND ACRONYMS .....	iii
<b>1.0 PROJECT INFORMATION .....</b>	<b>1-1</b>
<b>2.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED .....</b>	<b>2-6</b>
2.1 Determination.....	2-6
<b>3.0 CEQA ENVIRONMENTAL CHECKLIST .....</b>	<b>3-1</b>
3.1 Aesthetics .....	3-1
3.2 Agriculture and Forestry Resources .....	3-4
3.3 Air Quality .....	3-6
3.4 Biological Resources.....	3-13
3.5 Cultural Resources.....	3-15
3.6 Energy .....	3-17
3.7 Geology and Soils.....	3-18
3.8 Greenhouse Gas Emissions.....	3-22
3.9 Hazards and Hazardous Materials .....	3-26
3.10 Hydrology and Water Quality .....	3-31
3.11 Land Use and Planning.....	3-35
3.12 Mineral Resources .....	3-36
3.13 Noise.....	3-37
3.14 Population and Housing .....	3-40
3.15 Public Services .....	3-41
3.16 Recreation .....	3-41
3.17 Transportation.....	3-43
3.18 Tribal Cultural Resources.....	3-47
3.19 Utilities and Service Systems .....	3-49
3.20 Wildfire.....	3-51
3.21 Mandatory Findings of Significance.....	3-53
<b>4.0 REFERENCES.....</b>	<b>4-1</b>

## APPENDICES

### APPENDIX A CALEEMOD REPORT

### APPENDIX B NATIVE AMERICAN HERITAGE COMMISSION CORRESPONDENCE

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## FIGURES AND TABLES

### FIGURES

Figure 1: Project Location .....	1-3
Figure 2: Proposed Project.....	1-4

### TABLES

Table 1: Special Requirements for School Site Selection and Approval .....	2-7
Table 2: SJVAPCD Thresholds of Significance for Criteria Pollutants of Concern .....	3-7
Table 3: Project Construction Emissions .....	3-8
Table 4: Project Operation Emissions .....	3-8
Table 5: Estimated Construction Greenhouse Gas Emissions .....	3-23

## LIST OF ABBREVIATIONS AND ACRONYMS

AB	Assembly Bill
ALUP	Airport Land Use Plan
APN	Assessor's Parcel Number
BMP	Best Management Practices
CalEEMod	California Emissions Estimator Model
CALFIRE	California Department of Forestry and Fire Protection
CALFIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CAPCOA	California Air Pollution Control Officers' Association
CARB	California Air Resources Control Board
CDE	California Department of Education
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CNDDDB	California Natural Diversity Database
CO	Carbon monoxide
CO <sub>2</sub>	Carbon dioxide
CO <sub>2</sub> e	Carbon dioxide equivalent
DPM	Diesel particulate matter
EIR	Environmental Impact Report
FHSZ	Fire Hazard Severity Zone
GHG	Greenhouse gas
IG	Industrial General
ISR	Indirect Source Review
kV	Kilovolt
LED	light-emitting diode
LOS	Level of service
LRA	Local responsibility area
mph	miles per hour
N <sub>2</sub> O	nitrous oxide
NAHC	Native American Heritage Commission
NO <sub>x</sub>	Nitrogen oxides
NPDES	National Pollutant Discharge Elimination System
NPMS	National Pipeline Mapping System
OSHA	Occupational Safety and Health Administration
PM <sub>10</sub>	Particulate matter diameter 10 microns
PM <sub>2.5</sub>	Particulate matter diameter 2.5 microns
PPV	Peak particle velocity
PRC	Public Resources Code
RCRA	Resource Conservation and Recovery Act
ROC	Reactive organic compounds
SB	Senate Bill
SJCOE	San Joaquin County Office of Education
SJVAPCD	San Joaquin Valley Air Pollution Control District
SO <sub>2</sub>	Sulfur dioxide

SRA	State Responsibility Area
SWPPP	Stormwater Pollution Prevention Plan
SWRCB	State Water Resources Control Board
TAC	Toxic air contaminant
VDE	visible dust emissions
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle miles traveled
WDRs	Waste discharge requirements



## 1.0 PROJECT INFORMATION

**1. Project Title:**

Venture Charter Athletic Field Project

**2. Lead Agency Name and Address:**

San Joaquin County Office of Education  
2292 Transworld Drive  
Stockton, CA 95206

**3. Contact Person and Phone Number:**

Warren Sun, Division Director, (209) 468-9061

**4. Project Location:**

The project site is located on the south side of Transworld Drive, approximately 375 feet east of the intersection of Giannecchini Lane and Transworld Drive in the city of Stockton.

**5. Project Sponsor's Name and Address:**

N/A

**6. General Plan Designation:**

Industrial

**7. Zoning:**

Industrial General (IG)

**8. Description of Project:**

The San Joaquin County Office of Education (SJCOE) proposes to convert the existing natural grass field to synthetic turf with permanent markings for football and soccer use. The proposed project includes the development of an all-weather, 6-foot-wide walkway, new portable bleachers, and light-emitting diode (LED) sport field lighting. The project would also include 42-inch-high perimeter fencing, 20-foot-high barrier netting, pathway lighting, a new scoreboard, and a public address system. The project would provide accessible upgrades to the path of travel and parking lot, as needed.

The site is located at southwest of Transworld Drive, at the existing Venture Charter School campus addressed as 2922 Transworld Drive in Stockton, California (Figure 1). The property is identified as San Joaquin County Assessor's Parcel Number (APN) 179-240-100-000. The site is bounded to the northeast by Transworld Drive, beyond which is commercial buildings; to the southeast by asphalt concrete parking lots, a commercial building and a ball field; to the southwest by Arch Airport Road, beyond which is farmland; and, to the northwest by classrooms and asphalt concrete parking.

**9. Surrounding Land Uses and Setting:**

To the north, east, and west of the project site are lands designated by the City of Stockton General Plan Land Use Map as Industrial. To the south are lands designated Institutional and Commercial.

**10. Other Public Agencies Whose Approval is Required (e.g., permits, financial approval, or participation agreements):**

- California Department of Education, School Facilities and Transportation Unit
- Department of Toxic Substance Control
- Division of the State Architect
- Regional Water Quality Control Board
- Stockton Metropolitan Airport
- City of Stockton Public Works

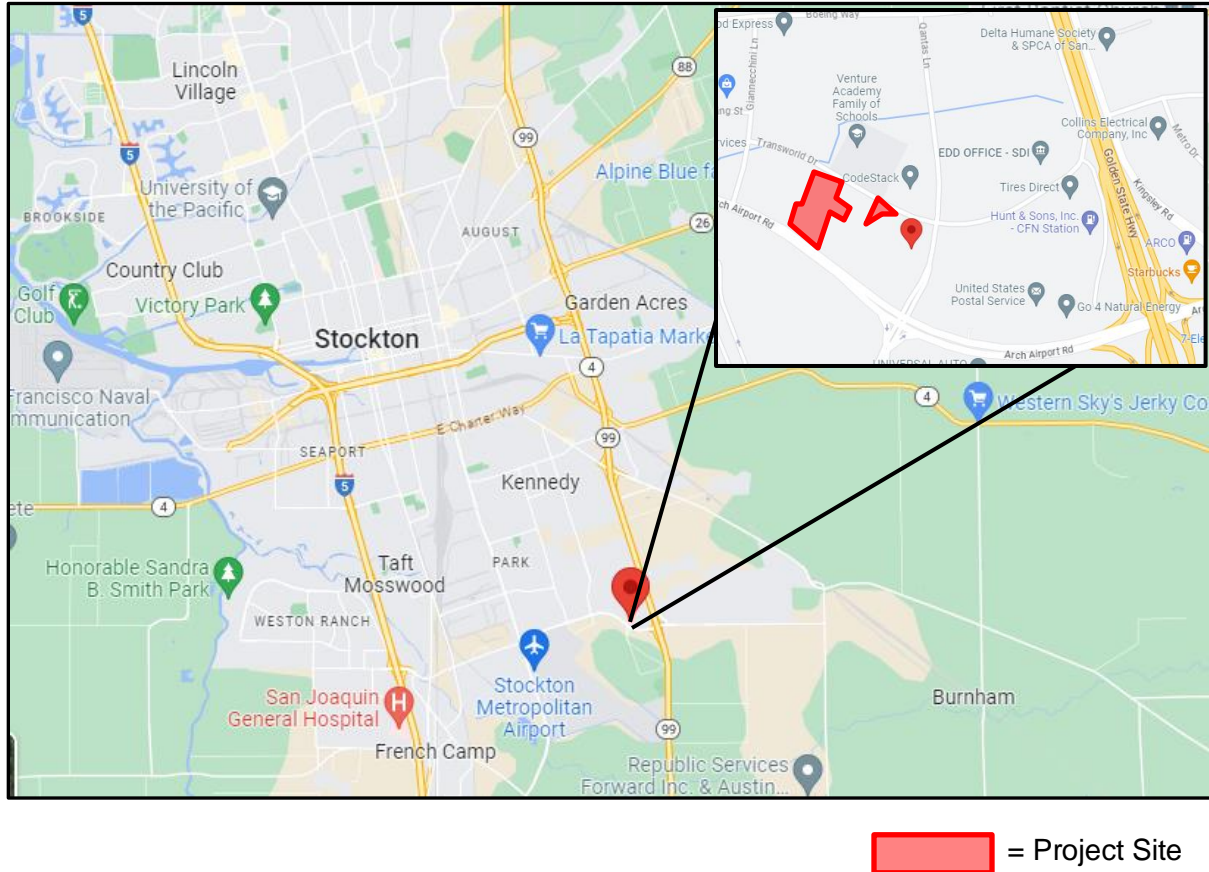


Figure 1: Project Location

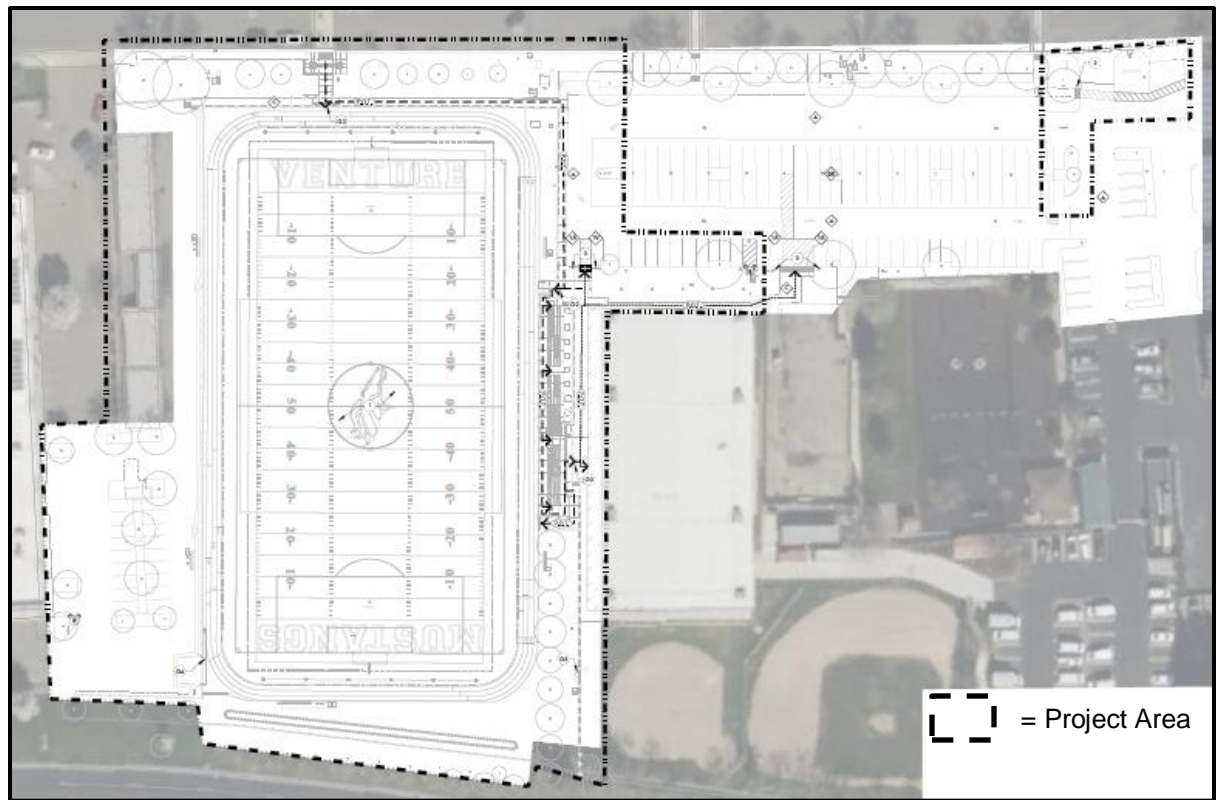


Figure 2: **Proposed Project**

**11. Have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resource Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?**

The SJCOE requested a Sacred Lands Inventory on file with the Native American Heritage Commission (NAHC) in May 2023. The NAHC indicated the Sacred Lands File search resulted in positive results. Based on the NAHC list of tribal representatives, the SJCOE notified 17 Native American tribal representatives consistent with AB 52 requirements (see Appendix B). As a result of the notifications, the Confederated Villages of Lisjan Nation requested that SJCOE provide the final California Historical Resources Information System, project environmental impact report, Sacred Lands File, and other relevant information. The District has provided the information that was available at the time of the request and will continue to work with the Confederated Villages of Lisjan Nation representatives. In the event that other tribal representatives express interest in the project and/or the project area, the District will coordinate with the tribes to address any concerns.

## 2.0 ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist in Chapter 3.0.

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Aesthetics                | <input type="checkbox"/> Agriculture and Forestry Resources | <input type="checkbox"/> Air Quality                        |
| <input type="checkbox"/> Biological Resources      | <input type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy                             |
| <input type="checkbox"/> Geology/Soils             | <input type="checkbox"/> Greenhouse Gas Emissions           | <input type="checkbox"/> Hazards & Hazardous Materials      |
| <input type="checkbox"/> Hydrology/Water Quality   | <input type="checkbox"/> Land Use/Planning                  | <input type="checkbox"/> Mineral Resources                  |
| <input type="checkbox"/> Noise                     | <input type="checkbox"/> Population/Housing                 | <input type="checkbox"/> Public Services                    |
| <input type="checkbox"/> Recreation                | <input type="checkbox"/> Transportation                     | <input type="checkbox"/> Tribal Cultural Resources          |
| <input type="checkbox"/> Utilities/Service Systems | <input type="checkbox"/> Wildfire                           | <input type="checkbox"/> Mandatory Findings of Significance |

## 2.1 DETERMINATION

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a "Potentially Significant Impact" or "Potentially Significant Unless Mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

*Warren Sun*

Signature

6/27/2023

Date

### Special Requirements under the State School Facility Program

In addition to the CEQA Guidelines, primary and secondary public schools have several additional requirements established by the California Code of Regulations and California Education Code. Table 1 identifies the specific health and safety requirements for a state-funded new school or a state-funded addition to an existing school site. These health and safety requirements are outlined in the California Department of Education (CDE) School Site Selection and Approval Guide. The analyses and response is included under the relevant section identified in the table below.

**Table 1: Special Requirements for School Site Selection and Approval**

Topic	Environmental Code	Environmental Checklist
<b>Air Quality</b>		
Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School?	PRC § 21151.8(a)(1)(D); Ed. Code § 17213(c)(2)(C)	Section 3.3 Air Quality, Question (e)
Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and non-permitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste?	PRC § 21151.8 (a)(2); Ed. Code § 17213 (b)	Section 3.3 Air Quality, Question (f)
<b>Geology and Soils</b>		
Does the site contain an active earthquake fault or fault trace, or is the site located within the boundaries of any special studies zone or within an area designated as geologically hazardous in the safety element of the local general plan?	CCR, Title 5 § 14010(f); Ed. Code, § 17212	Section 3.7 Geology and Soils, Question (a) (i)
Would the project involve the construction, reconstruction, or relocation of any school building on a site subject to moderate to high liquefaction?	CCR, Title 5 § 14010(i)	Section 3.7 Geology and Soils, Question (a)(iii)
Would the project involve the construction, reconstruction, or relocation of any school building on a site subject to landslides?	CCR, Title 5 § 14010(i)	Section 3.7 Geology and Soils, Question (a)(iv)
Would the project involve the construction, reconstruction, or relocation of any school building on the trace of a geological fault along which surface rupture can reasonably be expected to occur within the life of the school building?	CCR, Title 5 § 14010(f); Ed. Code § 17212	Section 3.7 Geology and Soils, Question (a)(i)
<b>Hazards and Hazardous Materials</b>		
Is the property line of the proposed school site less than the following distances from the edge of respective powerline easements: (1) 100 feet of a 50-133 kV line; (2) 150 feet of a 220-230 kV line; or (3) 350 feet of a 500-550 kV line?	CCR, Title 5 § 14010(c)	Section 3.9 Hazards and Hazardous Materials, Question (h)
Is the proposed school site located near an aboveground water or fuel storage tank or within 1,500 feet of an easement of an aboveground or	CCR, Title 5 § 14010(h)	Section 3.9 Hazards and



underground pipeline that can pose a safety hazard to the site?		Hazardous Materials, Question (i)
Is the proposed school site situated within 2,000 feet of a significant disposal of hazardous waste?	CCR, Title 5 § 14010(t)	Section 3.9 Hazards and Hazardous Materials, Question (d)
Does the proposed school site contain one or more pipelines, situated underground or aboveground, which carry hazardous substances, acutely hazardous materials, or hazardous wastes, unless the pipeline is a natural gas line that is used only to supply natural gas to that school or neighborhood?	PRC § 21151.8 (a)(1)(C)	Section 3.9 Hazards and Hazardous Materials, Question (i)
Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site? <i>(Does not apply to school sites approved by CDE prior to January 1, 1997.)</i>	Ed. Code § 17215.5 (a)	Section 3.9 Hazards and Hazardous Materials, Question (j)
Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?	PRC § 21151.8 (a)(1)(A)	Section 3.9 Hazards and Hazardous Materials, Question (k)
Is the project site a hazardous substance release site identified by the state Department of Health Services in a current list adopted pursuant to §25356 for removal or remedial action pursuant to Chapter 6.8 of Division 20 of the Health and Safety Code?	PRC § 21151.8 (a)(1)(B)	Section 3.9 Hazards and Hazardous Materials, Question (d)
If prepared, has the risk assessment been performed with a focus on children's health posed by a hazardous materials release or threatened release, or the presence of naturally occurring hazardous materials on the school site?	Ed. Code § 17210.1 (a)(3)	Section 3.9 Hazards and Hazardous Materials, Question (c)
If a response action is necessary and proposed as part of this project, has it been developed to be protective of children's health, with an ample margin of safety?	Ed. Code § 17210.1 (a)(4)	Section 3.9 Hazards and Hazardous Materials, Question (l)
Is the proposed school site within two miles, measured by airline, of that point on an airport runway or potential runway included in an airport master plan that is nearest to the site? <i>(Does not apply to school sites acquired prior to January 1, 1966.)</i>	Ed. Code § 17215 (a)&(b)	Section 3.9 Hazards and Hazardous Materials, Question (e)
<b>Hydrology and Water Quality</b>		
Is the project site subject to flooding or dam inundation?	CCR, Title 5 § 14010(g); Ed. Code § 17212;	Section 3.10 Hydrology and Water Quality, Question (d)
<b>Land Use and Planning</b>		
Would the proposed school conflict with any existing or proposed land uses, such that a potential health or safety risk to students would be created?	CCR, Title 5 § 14010(m)	Section 3.11 Land Use and Planning, Question(b)



<b>Noise</b>		
Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the education program?	CCR, Title 5 § 14010(e)	Section 3.13 Noise, Question (d)
<b>Public Services</b>		
Does the site promote joint use of parks, libraries, museums, and other public services?	CCR, Title 5 § 14010(o)	Section 3.15 Public Services, Question (f)
<b>Transportation</b>		
Is the proposed school site within 1,500 feet of a railroad track easement?	CCR, Title 5 § 14010(d)	Section 3.17 Transportation, Question (e)
Is the site easily accessible from arterials and is the minimum peripheral visibility maintained for driveways per Caltrans' Highway Design Manual?	CCR, Title 5 § 14010(k)	Section 3.17 Transportation, Question (f)
Are traffic and pedestrian hazards mitigated per Caltrans' School Area Pedestrian Safety manual?	CCR, Title 5 § 14010(l)	Section 3.17 Transportation, Question (g)



### 3.0 CEQA ENVIRONMENTAL CHECKLIST

#### 3.1 AESTHETICS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

##### 3.1.1 Impact Analysis

###### a. *Would the project have a substantial effect on a scenic vista?*

The proposed project area is located in industrial area characterized by views of the Venture Academy campus, industrial buildings, roads, curbs, gutters, sidewalks, and street lights. According to the City of Stockton County General Plan there are no designated scenic vistas within the planning area (see Figure 11-2).<sup>1</sup> Development of the proposed project would have no impact on a scenic vista.

<sup>1</sup> City of Stockton. Envision Stockton 2040 General Plan. Adopted December 4, 2018.

- b. *Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?*

According to the California Department of Transportation, there are no officially designated or eligible state scenic highways located within the vicinity of the proposed project. The project site has been developed as athletic field, and while ornamental trees are along the perimeter of the field, the site is devoid of rock outcroppings and historic structures. The nearest Eligible State Scenic Highway is Interstate 580, which is approximately 10.0 miles southwest of the proposed project.<sup>2</sup> Therefore, project construction and operation would have no impact on scenic resources within a state scenic highway.

- c. *In non-urbanized areas, would the project substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?*

The project would be located in an industrial area of the City of Stockton and would convert the natural turf of the existing recreational field with synthetic turf, introduce stadium seating, and LED lighting. The project would not conflict with applicable zoning or other regulations governing scenic quality with the City of Stockton. Therefore, this impact would be less than significant.

- d. *Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?*

Existing sources of nighttime lighting near the project site includes lighting from industrial uses surrounding the project site, street lights installed along Transworld Drive, and lighting from the Venture Academy campus. Existing sources of glare are relatively limited and would consist of headlights striking windows.

Construction of the project would take approximately 6 months to complete and would occur Monday through Friday 6:00 a.m. to 5:00 p.m. Because construction activities would cease at 5:00 p.m., the use of temporary lighting sources during construction would not be required.

Once installed, new lighting would facilitate nighttime use of the athletic field. Nighttime use of fields would occur up to seven days per week, and hours of operation would be until 10:00 p.m. Timers controlling the lights would be installed and programmed to shut off the lights at 10:00 p.m. (when seasonally needed).

Musco Lighting conducted a photometric study for the project to determine projected light levels emanating from the project area. The purpose of the study was to determine potential

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<sup>2</sup> Esri. 2017. California Scenic Highways.  
<https://www.arcgis.com/home/webmap/viewer.html?useExisting=1&layers=f0259b1ad0fe4093a5604c9b838a486a>. Accessed April 2023.

nighttime lighting impacts associated with project lighting and spillover to nearby properties and public roads. According to the study, proposed light fixtures would generate a maximum 48 maintained horizontal foot-candles of light in the field. Along the east side of the project area, the maximum vertical foot-candles of light would be 0.10.<sup>3</sup> The average light levels along the perimeter of the athletic field would be low, and the use of the field lights would be controlled by timers and lights would be shut off at 10:00 p.m. In addition, the lights would be fully shielded and downward directed to minimize light spillover onto adjacent properties for focus lighting onto the athletic field. Use of timers and downward directing of lighting would also reduce opportunities for sky glow and unnecessary illumination of nighttime skies. Therefore, project lighting and glare impacts would be less than significant and would not adversely affect existing nighttime and daytime views in the area.

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<sup>3</sup> Musco Lighting. 2022. Venture Academy. File #211864, August 12, 2022.

## 3.2 AGRICULTURE AND FORESTRY RESOURCES

In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment Project; and the forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 3.2.1 Impact Analysis

- a. *Would the project 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?*

The project area has been developed as an athletic field. The proposed project would not convert Important Farmland to non-agricultural use.

- b. Would the project conflict with existing zoning for agricultural use, or a Williamson Act contract?*

The proposed project area is zoned Industrial General (IG). The site is not actively used for agricultural use. Likewise, the project area is not under a Williamson Act Contract. There would be no conflict with existing zoning for agricultural use or a Williamson Act contract.

- c. Would the project 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))?*

The project site is surrounded by industrial and school-related uses. The site's existing zoning "Industrial General" does not support the definitions provided by Public Resources Code (PRC) Section 42526 for timberland, PRC Section 12220(g) for forestland, or Government Code Section 51104(g) for timberland zoned for production. Therefore, no impacts related to the conversion of timberlands or forest land would occur.

- d. Would the project result in the loss of forest land or conversion of forestland to non-forest use?*

As discussed in the response 3.2.1(c), the project site is surrounded by industrial and school-related uses. Implementation of the project would not result in the loss of forest land or conversion of forest land to non-forest use. No impact would occur.

- e. Would the project 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?*

As discussed in responses 3.2.1(a) and (c), the project site supports the school campus athletic field. No forest land is located within the project site or the vicinity of the project site. Implementation of the proposed project would not result in changes to the environment that, due to its location or nature, could result in the conversion of farmland to non-agricultural use or converting forest land to non-forest use. Therefore, no impact would occur.

### 3.3 AIR QUALITY

Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with or obstruct implementation of the applicable air quality plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Expose sensitive receptors to substantial pollutant concentrations?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and non-permitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.3.1 Impact Analysis

- a. *Would the project conflict with or obstruct implementation of the applicable air quality plan?*

The proposed project site is located within the City of Stockton, in San Joaquin County, which is within the jurisdictional boundaries of the San Joaquin Valley Air Pollution Control District (SJVAPCD). The San Joaquin Valley's relatively flat topography surrounded by elevated terrain and its meteorology provide ideal conditions for trapping air pollution and producing harmful levels of air pollutants, such as ozone and particulate matter. Elevated temperatures, cloudless days, low precipitation levels, and light winds during the summer in the Valley are favorable to high ozone levels. Inversion layers in the atmosphere during the winter months can also trap emissions of directly emitted PM<sub>2.5</sub> (particulate matter that is 2.5 microns or less in diameter) and PM<sub>2.5</sub> precursors (such as nitrogen oxides [NO<sub>x</sub>] and sulfur dioxide [SO<sub>2</sub>]) within the Valley for several days, accumulating to unhealthy levels.



At the federal level, the jurisdictional area of the SJVAPCD is designated as extreme nonattainment for the 8-hour ozone standard, nonattainment for PM<sub>2.5</sub>, and attainment or unclassified for all other criteria pollutants. At the State level, the area is designated as severe nonattainment for the one-hour ozone standard, and nonattainment for the 8-hour ozone, PM<sub>10</sub>, and PM<sub>2.5</sub> standards. The area is designated attainment or unclassified for all other State standards. Due to the nonattainment designations, the SJVAPCD has developed plans to attain the State and federal standards for ozone and particulate matter. The plans include the 2013 Plan for the Revoked 1-Hour Ozone Standard, the 2007 Ozone Plan, the 2007 PM<sub>10</sub> Maintenance Plan and Request for Redesignation, the 2008 PM<sub>2.5</sub> Plan, and the 2012 PM<sub>2.5</sub> Plan.

The SJVAPCD's recommended thresholds of significant impact are a major component of the SJVAPCD's air quality plans. According to the SJVAPCD, projects with emissions should be compared to the thresholds of significance (Table 2) for criteria pollutants in order to determine potential conflict with or obstruction of the applicable air quality plan.

**Table 2: SJVAPCD Thresholds of Significance for Criteria Pollutants of Concern**

Pollutant	Thresholds of Significance	
	Construction (tons/year)	Operations
ROG	10	10
NO <sub>x</sub>	10	10
CO	100	100
SO <sub>x</sub>	27	27
PM <sub>10</sub>	15	15
PM <sub>2.5</sub>	15	15

Source: San Joaquin Valley Air Pollution Control District. 2015. Guide for Assessing and Mitigating Air Quality Impacts. March 19, 2015.

Potential air quality impacts associated with short-term construction and long-term operations were evaluated in accordance with SJVAPCD-recommended and the California Air Resources Board (CARB) approved methodologies. Construction and operational emissions of criteria air pollutants were compared with the applicable thresholds of significance (described below) to determine potential impacts. SJVAPCD's significance thresholds are used to determine whether the project would result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in non-attainment, and also serve a proxy to determine the potential for the project to conflict with or obstruct implementation of any applicable air quality plan.

The California Emissions Estimator Model (CalEEMod), Version 2022.1.1.11, was used to estimate construction emissions for the proposed project. For purposes of this CalEEMod analysis, the construction schedule was estimated to be 6 months, starting in Fall 2023. Default assumptions (e.g., construction fleet activities) from CalEEMod were used. Appendix A contains CalEEMod output worksheets. Results are summarized in Table 3.

**Table 3: Project Construction Emissions**

	Emissions (tons/year)					
	CO	NO <sub>x</sub>	ROC	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Year 2023	0.81	0.79	0.08	<0.005	0.16	0.09
Year 2024	0.35	0.25	0.03	<0.005	0.02	0.01
SJVAPCD Significance Threshold	100	10	10	27	15	15
<b>Exceed Threshold?</b>	No	No	No	No	No	No

Source: Compiled by SSS, Inc. (2023).

CO = carbon monoxide

N/A = Not Applicable

NO<sub>x</sub> = nitrogen oxides

PM<sub>10</sub> = particulate matter less than 10 microns in size

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in size

ROC = reactive organic compounds

SJVAPCD = San Joaquin Valley Air Pollution Control District

SO<sub>x</sub> = sulfur oxides

As shown in Table 3, construction emissions associated with the proposed project would be less than significant. Although the proposed project would not exceed the SJVAPCD significance thresholds for criteria pollutants, construction best management practices that are recommended by the SJVAPCD are included in **Mitigation Measure AIR-1**.

CalEEMod was also used to estimate long-term operational emissions, as well as emissions associated with area and energy sources (i.e., natural gas combustion, landscape maintenance, periodic architectural coating, and consumer products).

Model results are shown in Table 4. Appendix A contains model output worksheets.

As shown in Table 4, project-related long-term air emissions would occur primarily from vehicle trips associated with the proposed project (i.e., mobile source emissions). Project-related long-term air emissions would also occur from the use of landscape equipment and from the use of consumer products (i.e., area sources).

**Table 4: Project Operation Emissions**

	Emissions (tons/year)					
	CO	NO <sub>x</sub>	ROC	SO <sub>x</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>
Operations	0.02	<0.005	0.02	<0.005	--	--
SJVAPCD Significance Threshold	100	10	10	27	15	15
<b>Exceed Threshold?</b>	No	No	No	No	No	No

Source: Compiled by SSS, Inc. (2023).

CO = carbon monoxide

N/A = Not Applicable

NO<sub>x</sub> = nitrogen oxides

PM<sub>10</sub> = particulate matter less than 10 microns in size

PM<sub>2.5</sub> = particulate matter less than 2.5 microns in size

ROC = reactive organic compounds

SJVAPCD = San Joaquin Valley Air Pollution Control District

SO<sub>x</sub> = sulfur oxides

The results shown in Table 4 indicate the project would not exceed the significance criteria for annual criteria pollutant emissions. Therefore, the proposed project would not violate any air quality standard or contribute substantially to an existing or projected air quality violation, and impacts would be less than significant. No mitigation is required.

- b. Would the project 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?*

Air pollution by its nature is largely a cumulative impact. No single project is sufficient in size, by itself, to result in nonattainment of ambient air quality standards. If a project exceeds the identified significance thresholds, its emissions would be cumulatively considerable, resulting in significant adverse air quality impacts to the region's existing air quality conditions. The proposed project would not, by itself, result in any air pollutant emissions exceeding SJVAPCD's significance thresholds as discussed above. Individually, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the region is in nonattainment. Therefore, the proposed project would have a less than significant impact.

- c. Would the project expose sensitive receptors to substantial pollutant concentrations?*

During construction, diesel equipment would be operating. Diesel particulate matter (DPM) is known to the State of California as a toxic air contaminant (TAC). The risks associated with exposure to substances with carcinogenic effects are typically evaluated based on a lifetime of chronic exposure, which is defined in the California Air Pollution Control Officers' Association (CAPCOA's) Air Toxics "Hot Spots" Program Risk Assessment Guidelines as 24 hours per day, seven days per week, 365 days per year, for 70 years. DPM would be emitted during the short term of construction assumed for the proposed project from heavy equipment used in the construction process. Because diesel exhaust particulate matter is considered carcinogenic, long-term exposure to diesel exhaust emissions has the potential to result in adverse health impacts. Due to the short-term nature of project construction, impacts from exposure to diesel exhaust emissions during construction would be less than significant.

- d. Would the project result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?*

The CEQA guidelines indicate that a significant impact would occur if the proposed project would create objectionable odors affecting a substantial number of people. Construction of the proposed project would emit diesel exhaust and volatile organic compounds, which are objectionable to some; however, emissions will disperse rapidly from the project site and the activity would be temporary. Impacts due to objectionable odors would be less than significant.

- e. Is the boundary of the proposed school site within 500 feet of the edge of the closest traffic lane of a freeway or busy traffic corridor? If yes, would the project create an air quality health risk due to the placement of the School?*

Busy traffic corridors are defined as 100,000 vehicles per day in an urban area as defined by the California Department of Education. There are no busy traffic corridors within 500 feet of the project site. The nearest highway is State Route 99, which is located approximately 0.35 mile east of the proposed project area. This impact would be less than significant.

- f. Would the project create an air quality hazard due to the placement of a school within one-quarter mile of: (a) permitted and non-permitted facilities identified by the jurisdictional air quality control board or air pollution control district; (b) freeways and other busy traffic corridors; (c) large agricultural operations; and/or (d) a rail yard, which might reasonably be anticipated to emit hazardous air emissions, or handle hazardous or acutely hazardous material, substances, or waste?*

The proposed project would not cite a new school facility at the proposed project site. However, within one-quarter mile of the proposed project area are industrial, agricultural, and school-related uses. These uses would not create an air quality hazard for the proposed project. As discussed in response 3.3 (e), the nearest highway is approximately 0.35 mile from the proposed project area. Agricultural operations are located south of the proposed school site beyond Arch Airport Road. The project area is located approximately 1.85 mile southwest of the existing Union Pacific line. This impact would be less than significant.

### 3.3.2 Mitigation Measures

**Mitigation Measure AIR-1:** Construction of the proposed project shall comply with all the applicable regulations specified in the San Joaquin Valley Air Pollution Control District Regulation VIII (Fugitive Dust Rules). The following procedures will be adhered to by the construction contractor(s) in accordance with Regulation VIII practices:

- Visible Dust Emissions (VDE) from construction, demolition, excavation, or other earthmoving activities related to the Project shall be limited to 20% opacity or less, as defined in Rule 8011.
- Pre-water all land clearing, grubbing, scraping, excavation, land leveling, grading, cut and fill, and phase earthmoving.
- Apply water, chemical/organic stabilizer/suppressant, or vegetative ground cover to all disturbed areas, including unpaved roads.
- Restrict vehicular access to the disturbance area during periods of inactivity.
- Apply water or chemical/organic stabilizers/suppressants, construct wind barriers and/or cover exposed potentially dust-generating materials.
- When materials are transported off-site, stabilize, and cover all materials to be transported and maintain six inches of freeboard (i.e., minimum vertical distance between the top of the load and the top of the trailer) space from the top of the container.
- Remove carryout and track out of soil materials on a daily basis unless it extends more than 50 feet from site; carryout and track out extending more than 50 feet from the site shall be removed immediately. The use of dry rotary brushes is expressly prohibited except where preceded or accompanied by sufficient wetting to limit the visible dust emissions. Use of blower devices is expressly forbidden. If the project

- would involve more than 150 construction vehicle trips per day onto the public street, additional restrictions specified in Section 5.8 of Rule 8041 shall apply.
- Traffic speeds on unpaved roads shall be limited to 15 mph.
  - During construction, all earth moving activities shall cease during periods of high winds (i.e., greater than 30 mph). To assure compliance with this measure, grading activities are subject to periodic inspections by SJCOE staff.
  - Construction equipment shall be kept in proper operating condition, including proper engine tuning and exhaust control systems.
  - Areas following clearing, grubbing and/or grading shall receive appropriate best management practices (BMP) treatments (e.g., re-vegetation, mulching, covering with tarps, etc.) to prevent fugitive dust generation.
  - All exposed soil or material stockpiles that will not be used within 3 days shall be enclosed, covered, or watered twice daily, or shall be stabilized with approved nontoxic chemical soil binders at a rate to be determined by the on-site construction supervisor.
  - Unpaved access roads shall be stabilized via frequent watering, non-toxic chemical stabilization, temporary paving, or equivalent measures at a rate to be determined by the on-site construction supervisor.
  - Trucks transporting materials to and from the site shall allow for at least two feet of freeboard. Alternatively, trucks transporting materials shall be covered.
  - Where visible soil material is tracked onto adjacent public paved roads, the paved roads shall be swept, and debris shall be returned to the construction site or transported off site for disposal.
  - Wheel washers, dirt knock-off grates/mats, or equivalent measures shall be installed within the construction site where vehicles exit unpaved roads onto paved roads.
  - Diesel powered construction equipment shall be maintained in accordance with manufacturer's requirements and shall be retrofitted with diesel particulate filters where available and practicable.
  - Heavy duty diesel trucks and gasoline powered equipment shall be turned off if idling is anticipated to last for more than 5 minutes.
  - Where feasible, the construction contractor shall use alternatively fueled construction equipment, such as electric or natural gas-powered equipment or biofuel.
  - Heavy construction equipment shall use low NO<sub>x</sub> diesel fuel to the extent that it is readily available at the time of construction.

- The construction contractor shall maintain signage along the construction perimeter with the name and telephone number of the individual in charge of implementing the construction emissions mitigation plan, and with the telephone number of the SJVAPCD's complaint line. The contractor's representative shall maintain a log of any public complaints and corrective actions taken to resolve complaints.
- During grading and site preparation activities, exposed soil areas shall be stabilized via frequent watering, non-toxic chemical stabilization, or equivalent measures at a rate to be determined by the on-site construction supervisor.
- During windy days when fugitive dust can be observed leaving the construction site, additional applications of water shall be required at a rate to be determined by the onsite construction supervisor.

### 3.4 BIOLOGICAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.4.1 Impact Analysis

- a. *Would the project 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?*

The project site has been developed for recreational use as athletic field. A search of the California Department of Wildlife's California Natural Diversity Database (CNDDDB) Stockton East 7.5-minute quadrangle identified 18 occurrences of special-status plant and animal species. However, no suitable habitat is present within the proposed project area to support the special-status species. No native habitat is present on or adjacent to the project site. Because of the surrounding built environment, no mammals other than raccoons, domestic dogs and cats occur in the area, nor do any reptilian species. Common native and non-native bird species may find shelter and nesting opportunities within the mature street trees located in the area; however, no trees are located on the project site. Construction and operation of the proposed project would not impact species identified as candidate, sensitive, or special-status in local or regional plans, policies, and regulations.



- b. Would the project 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?*

Review of the National Wetlands Inventory indicates there are no surface waters within 0.4 mile of the project site. Therefore, no direct or indirect impacts to riparian habitat or other sensitive natural communities are anticipated as a result of project activities.

- c. Would the project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

Review of the National Wetlands Inventory indicates no wetlands are mapped on the project site. Therefore, no direct or indirect impacts to federally protected wetlands as defined by Section 404 of the Clean Water Act through direct removal, filling, hydrological interruption, or other means are anticipated as a result of project activities.

- d. Would the project 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?*

The project site has been developed for recreational use as an athletic field and is surrounded by fencing. The project site does not contain wildlife travel routes, such as a riparian strip, ridgeline, drainage, or wildlife crossings, such as a tunnel, culvert, or underpass.

No established resident or migratory wildlife corridors occur within the project site. Therefore, the project would not interfere substantially with or impede: (1) the movement of any resident or migratory fish or wildlife species, (2) established resident or migratory wildlife corridors, or (3) the use of wildlife nursery sites.

- e. Would the project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

No native trees or shrubs and no sensitive habitats are present on the project site. The proposed project would not impact trees of biological resources. Therefore, the project would not conflict with local policies or ordinances protecting biological resources.

- f. Would the project conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?*

San Joaquin County is subject to the San Joaquin County Multi-Species Habitat Conservation and Open Space Plan; however, the proposed project would convert a grass athletic field to synthetic turf and would not convert open space to a developed use. This impact would be less than significant.



### 3.5 CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of formal cemeteries?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### 3.5.1 Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

The existing athletic field was developed approximately 10 years ago. Given that the field and associated uses are less than 50 years old, the existing athletic field does not have the potential to be a historic resource. However, if previously undiscovered historical resources are encountered during project-related activities, work should be temporarily halted in the vicinity of the discovered materials and workers should avoid altering the materials and their context until a qualified professional archaeologist has evaluated the situation and provided appropriate recommendations (**Mitigation Measure CULT-1**). With implementation of Mitigation Measure CULT-1, potential impacts to historical resources would be less than significant.

- b. *Would the project cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?*

The project site and surrounding lands have been heavily disturbed by previous grading activity and are underlain by a variable thickness of artificial fill or disturbed soil typical of a developed area. Therefore, the potential for the site to contain archaeological resources is considered to be low.

However, unknown or unrecorded resources may potentially be revealed during construction activities associated with the light standard installation and the installation of the pre-fabricated buildings. This may occur if ground disturbance activities penetrate deeper than previous work performed. In the event that archaeological resources are observed during project construction-related activities, Mitigation Measure CULT-1 would reduce impacts to a less than significant level. With the implementation of Mitigation Measure CULT-1, impacts to archaeological resources would be less than significant.

- c. *Would the project disturb any humans remains, including those interred outside of formal cemeteries?*

The project site and surrounding area has been mass graded. During previous ground disturbance activities, no human remains were identified or recorded onsite. In the unlikely

event that human remains are discovered, during precise grading or construction activities, implementation of **Mitigation Measure CULT-2** would require that human remains encountered during project activities are treated in a manner consistent with state law and reduce impacts to human remains to a less than significant level as required by CEQA. This would occur through the respectful coordination with descendant communities to ensure that the traditional and cultural values of said community are incorporated in the decision-making process concerning the disposition of human remains that cannot be avoided. With implementation of Mitigation Measure CULT-2 would reduce this potential impact to a less than significant level.

### 3.5.2 Mitigation Measures

**Mitigation Measure CULT-1:** If prehistoric or historic-period archaeological deposits are discovered during project activities, all work within 25 feet of the discovery shall be redirected and the archaeologist shall assess the situation, consult with agencies as appropriate, and make recommendations regarding the treatment of the discovery. Impacts to archaeological deposits shall be avoided by project activities, but if such impacts cannot be avoided, the deposits shall be evaluated for their California Register eligibility. If the deposits are not California Register-eligible, no further protection of the finds is necessary. If the deposits are California Register-eligible, the deposits shall be protected from project-related impacts, or such impacts shall be mitigated. Mitigation may consist of, but is not necessarily limited to, systematic recovery and analysis of archaeological deposits, recording the resource, preparation of a report of findings, and accessioning recovered archaeological materials at an appropriate curation facility. Public educational outreach by SJCOE may also be appropriate.

**Mitigation Measure CULT-2:** Any human remains encountered during project ground-disturbing activities shall be treated in accordance with California Health and Safety Code Section 7050.5. The SJCOE shall inform its contractor(s) of the sensitivity of the Direct Area of Potential Effect for human remains and verify that the following directive has been included in the appropriate contract documents:

If human remains are encountered during project activities, the project shall comply with the requirements of California Health and Safety Code Section 7050.5. There shall be no further excavation or disturbance of the site or any nearby area reasonably suspected to overlie adjacent remains until the county coroner has determined the manner and cause of any death, and the recommendations concerning the treatment and disposition of the human remains have been made to the person responsible for the excavation or to his or her authorized representative. At the same time, an archaeologist shall be contacted to assess the situation and consult with agencies as appropriate. Project personnel/construction workers shall not collect or move any human remains and associated materials. If the human remains are of Native American origin, the coroner must notify the Native American Heritage Commission within 24 hours of this identification. The Native American Heritage Commission will identify a Native American Most Likely Descendant to inspect the site and provide recommendations for the proper treatment of the remains and associated grave goods.

## 3.6 ENERGY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### 3.6.1 Impact Analysis

- a. *Would the project result in a potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources during project construction or operation?*

The proposed project would not have a direct or cumulative impact, or create wasteful, inefficient, or unnecessary consumption of energy resources during construction or operation of the proposed project. Also, the proposed project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. The only energy consumed would be through fossil fuels (gasoline and diesel operated equipment) during construction-related activities and operation of the light standards proposed at the sports field/stadium. The proposed lighting would be in compliance with requirements of the current California Energy Commission efficiency standards for non-residential buildings. Therefore, the proposed project would result in a less-than-significant impact related to wasteful, inefficient, or unnecessary consumption of energy resources.

- b. *Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?*

Title 24 is designed to provide certainty and uniformity throughout California while ensuring that the efficient and non-wasteful consumption of energy is carried out through design features. Adherence to Title 24 is deemed necessary to ensure that no significant impacts occur from the inefficient, wasteful, and unnecessary consumption of energy. The proposed lighting would be in compliance with requirements of the current California Energy Commission efficiency standards for non-residential buildings. This impact would be less than significant.

### 3.7 GEOLOGY AND SOILS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.7.1 Impact Analysis

- a. *Would the project directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:*
- i. *Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.*

The project site is not within a designated State of California Alquist-Priolo Earthquake Fault Zone. The nearest fault is in the Greenville Fault, which is located 30 miles southwest of the project area. Therefore, impacts to the project area from rupture of a known earthquake fault would be less than significant.

*ii. Strong seismic ground shaking?*

The project area is located in a seismic zone which is sufficiently far from known faults and consists primarily of a stable geological formation. The nearest fault is in the Greenville Fault, which is located 30 miles southwest of the project area. Therefore, the impact due to ground shaking would be less than significant.

*iii. Seismic-related ground failure, including liquefaction?*

Liquefaction is a soil strength and stiffness loss phenomenon that typically occurs in loose, saturated, cohesionless soil as a result of strong ground shaking during earthquakes. The potential for liquefaction at a site is usually determined based on the results of a subsurface geotechnical investigation and the groundwater conditions beneath the site. Hazards to structures associated with liquefaction include bearing capacity failure, lateral spreading, and differential settlement of soils below foundations, which can contribute to structural damage or collapse.

According to the geotechnical report prepared for the proposed project, there have been no reported instances of liquefaction having occurred within the Stockton area during the major earthquake events of 1892 (Vacaville-Winters), 1906 (San Francisco), 1989 (Loma Prieta), and 2014 (South Napa).<sup>4</sup> The potential for liquefaction occurring at the site during seismic events is very low.

*iv. Landslides?*

The project area is located on geographically level terrain (average grade less than five degrees) considered insufficient to produce a landslide. There are no slopes in the immediate or general area. As a result, no impacts related to landslides are anticipated.

*b. Would the project result in substantial soil erosion or the loss of topsoil?*

The proposed project involves the installation of light standards and converting the grass athletic field to synthetic turf. The project would require minimal ground disturbance; and therefore, the potential for soil erosion or loss of topsoil would be less than significant.

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<sup>4</sup> Wallace Kuhl & Associates. 2022. *Geotechnical Engineering Report Venture Charter Athletic Field*. October 20, 2022.

- c. *Would the project 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?*

According to the U.S. Department of Agriculture Web Soil Survey, the project area is underlain by Hollenbeck silty clay, 0 to 2 percent slopes and Stockton clay, 0 to 2 percent slopes.<sup>5</sup> The soils within the project area have a moderate to high shrink-swell potential. With implementation of **Mitigation Measure GEO-1**, which would require replacement or amendment of existing soils, expansive soils impact would be less than significant.

- d. *Would the project be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?*

See response 3.7.1(c).

- e. *Would the project 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?*

The project would not include installation of septic tanks. Therefore, the capability of the soils to support the operation of such tanks does not need to be evaluated. No impact would occur in association with construction and operation of the project.

- f. *Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?*

According to the City of Stockton General Plan Draft Environmental Impact Report (EIR), paleontological resources have been recorded in the City;<sup>6</sup> therefore, the potential exists that paleontological resources are discovered during construction activities. Implementation of General Plan Action LU-5.2.D requires identification and protection of paleontological resources, including through a treatment plan in accordance with appropriate standards where avoidance is not feasible. With implementation of the General Plan Action LU-5.2.D, this impact would be less than significant.

### 3.7.2 Mitigation Measures

**Mitigation Measure GEO-1:** Due to the potential expansion characteristics of the native soils, the project contractor shall use imported non-expansive engineered fill for the upper 12 inches of the final subgrade below structures, if planned.

As an alternative to the use of imported, very low-expansive (Expansion Index  $\leq 20$ ), granular soils beneath interior and exterior concrete slabs-on-grade, amendment of the on-

<sup>5</sup> U.S. Department of Agriculture Web Soil Survey. 2023. Available:  
<https://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx>

<sup>6</sup> City of Stockton. 2018. Envision Stockton 2040 General Plan Update and Utility Master Plan Supplements Final EIR and Mitigation Monitoring and Reporting Program. Adopted December 2018.

site clay soils with lime, such as quicklime (high-calcium or dolomitic), shall be implemented to mitigate the effect of expansion pressures on interior and exterior concrete slabs-on-grade produced by untreated on-site clay soils.

### 3.8 GREENHOUSE GAS EMISSIONS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.8.1 Impact Analysis

- a. *Would the project generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?*

Greenhouse gases (GHGs) are gases that absorb infrared radiation in the atmosphere. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature. Global climate change concerns are focused on whether human activities are leading to an enhancement of the greenhouse effect. Principal GHGs include carbon dioxide, methane, nitrous oxide, ozone, and water vapor. Climate change is affecting California: average temperatures have increased, leading to more extreme hot days and fewer cold nights; shifts in the water cycle have been observed, with less winter precipitation falling as snow, and both snowmelt and rainwater running off earlier in the year; sea levels have risen; and wildland fires are becoming more frequent and intense due to dry seasons that start earlier and end later.

The effect each GHG has on climate change is measured as a combination of the mass of its emissions and the potential of a gas or aerosol to trap heat in the atmosphere, known as its global warming potential, which varies among GHGs. Total GHG emissions are expressed as a function of how much warming would be caused by the same mass of carbon dioxide (CO<sub>2</sub>). Thus, GHG emissions are typically measured in terms of pounds or tons of CO<sub>2</sub> equivalent (CO<sub>2</sub>e).

Addressing GHG generation impacts requires an agency to make a determination as to what constitutes a significant impact. Governor's Office of Planning and Research's Guidance does not include a quantitative threshold of significance to use for assessing a proposed project's GHG emissions under CEQA. Moreover, CARB has not established such a threshold or recommended a method for setting a threshold for proposed development-level analysis.

#### Construction

Construction of the proposed project would result in GHG emissions that are primarily associated with use of off-road construction equipment and off-site sources including haul trucks, vendor trucks, and worker vehicles. CalEEMod was used to calculate the annual GHG emissions based on the construction scenario as analyzed in Section 3.3, Air Quality.



It was assumed that construction would begin in 2023. Emissions from on-site and off-site sources are combined for the purposes of this analysis and are presented below in Table 5.

**Table 5: Estimated Construction Greenhouse Gas Emissions**

Year	CO <sub>2</sub>	CH <sub>4</sub>	N <sub>2</sub> O	CO <sub>2</sub> e
	Metric Tons per Year			
2023	112	<0.005	<0.005	112
2024	49.4	<0.005	<0.005	49.4
<b>Total Project Emissions</b>				<b>161.4</b>

Source: School Site Solutions (2022)

Notes: CO<sub>2</sub> = carbon dioxide; CH<sub>4</sub> = methane; N<sub>2</sub>O = nitrous oxide; CO<sub>2</sub>e = carbon dioxide equivalent.

As shown in Table 5, total construction GHG emissions would be approximately 161.4 metric tons CO<sub>2</sub>e as a result of construction-related activities. Construction GHG emissions are a one-time release and are typically considered separate from operational emissions, as global climate change is inherently a cumulative effect that occurs over a long period of time and is quantified on a yearly basis. The project's construction-related GHG emissions would represent a less than significant impact.

## Operation

The SJVAPCD has adopted Rule 9510 – Indirect Source Review (ISR) in order to:

- Fulfill the District's emission reduction commitments in the PM<sub>10</sub> and Ozone Attainment Plans;
- To achieve emission reductions from the construction and use of development projects through design features and on-site measures; and
- To provide a mechanism for reducing emissions from the construction of and use of development projects through off-site measures.

Rule 9510 – Indirect Source Review applies to any applicant that seeks to gain a final discretionary approval for a development project, or any portion thereof, which upon full buildout will include any of the following:

- 50 residential units;
- 2,000 square feet of commercial space;
- 25,000 square feet of light industrial space;
- 100,000 square feet of heavy industrial space;
- 20,000 square feet of medical office space;
- 39,000 square feet of general office space;

- 9,000 square feet of educational space;
- 10,000 square feet of government space;
- 20,000 square feet of recreational space; or
- 9,000 square feet of space not identified above.

Following the completion of construction activities, the project would generate new GHG emissions from mobile sources related to light standard maintenance (vehicle trips) and energy sources (electricity consumption). Based on the CalEEMod results the project would generate 9.11 metric tons CO<sub>2</sub>e per year. In terms of operational emissions, CARB staff allows small projects to be considered insignificant if a project consists of a quantitative threshold of 7,000 metric tons of CO<sub>2</sub>e per year for operational emissions. The proposed project would operate well below the proposed threshold of significance of 7,000 metric tons per year of CO<sub>2</sub>e for operations proposed by CARB. This impact would be less than significant.

According to the SJVAPCD, if a project exceeds 9,000 square feet of recreational space, the SJVAPCD concludes that the proposed project would be subject to SJVAPCD Rule 9510 (Indirect Source Review). As the SJVAPCD notes, in general, new development contributes to the air pollution problem by increasing the number of vehicles and the amount of vehicle miles traveled; the SJVAPCD states that Rule 9510 ISR is in response to reduce vehicle miles traveled. It is worth noting then, that the proposed project would replace the existing grass athletic field with synthetic turf and would add bleachers and lights. The proposed project would not introduce a new use to the site. Because the proposed project would continue existing uses on site and would not result in a more intensive use on site, this impact would be less than significant.

*b. Would the project conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?*

The Scoping Plan, approved by CARB in 2008 and updated in 2014 and 2017, provides a framework for actions to reduce California's GHG emissions and requires CARB and other state agencies to adopt regulations and other initiatives to reduce GHGs.<sup>7</sup> The Scoping Plan is not directly applicable to specific projects, nor is it intended to be used for project-level evaluations. Relatedly, in the Final Statement of Reasons for the Amendments to the CEQA Guidelines, the California Natural Resources Agency observed that "the [Scoping Plan] may not be appropriate for use in determining the significance of individual projects because it is conceptual at this stage and relies on the future development of regulations to implement the strategies identified in the Scoping Plan".<sup>8</sup> However, under the Scoping Plan there are several state regulatory measures aimed at the identification and reduction of GHG

<sup>7</sup> California Air Resources Board. 2008. Scoping Plan. Available: <https://ww2.arb.ca.gov/our-work/programs/ab-32-climate-change-scoping-plan/2008-scoping-plan-documents>. Accessed April 2023.

<sup>8</sup> Ibid.

emissions. CARB and other state agencies have adopted many of the measures identified in the Scoping Plan. Most of these measures focus on area source emissions (e.g., energy usage, high Global Warming Potential GHGs in consumer products) and changes to the vehicle fleet (i.e., hybrid, electric, and more fuel-efficient vehicles) and associated fuels (e.g., low-carbon fuel standard), among others. The project would comply with all applicable regulations adopted in furtherance of the Scoping Plan to the extent required by law.

Regarding consistency with post-2020 statewide targets, specifically Senate Bill 32 (goal of reducing GHG emissions to 40% below 1990 levels by 2030) and Executive Order S-3-05 (goal of reducing GHG emissions to 80% below 1990 levels by 2050), there are no established protocols or thresholds of significance for that future-year analysis. However, CARB forecasts that compliance with the current Scoping Plan puts the state on a trajectory of meeting these long-term GHG goals, although the specific path to compliance is unknown. The Scoping Plan Second Update reaffirms that the state is on the path toward achieving the 2050 objective of reducing GHG emissions to 80% below 1990 after the adoption of Senate Bill 32 and Assembly Bill 197 in 2016.

As discussed previously, the project would generate minimal short-term GHG emissions and long-term operational GHG emissions. Operational GHG emissions would be considerably less than the CAPCOA GHG emissions threshold of 900 MT CO<sub>2</sub>e per year and as such, construction and operation of the project would not conflict with the state's trajectory toward future GHG reductions. With respect to future GHG targets under Senate Bill 32 and Executive Order S-3-05, CARB has also made clear its legal interpretation that it has the requisite authority to adopt whatever regulations are necessary, beyond the AB 32 horizon year of 2020, to meet the reduction targets in 2030 and in 2050. This legal interpretation by an expert agency provides evidence that future regulations will be adopted to continue the state on its trajectory toward meeting these future GHG targets. Based on the preceding considerations, the project would not conflict with an applicable plan, policy, or regulation adopted to reduce the emissions of GHGs, and impacts would be less than significant.

### 3.9 HAZARDS AND HAZARDOUS MATERIALS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. Is the property line of the proposed school site less than the following distances from the edge of respective powerline easements: (1) 100 feet of a 50-133 kV line; (2) 150 feet of a 220-230 kV line; or (3) 350 feet of a 500-550 kV line?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. Is the proposed school site located near an aboveground water or fuel storage tank or within 1,500 feet of an easement of an aboveground or underground pipeline that can pose a safety hazard to the site?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
j. Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site? <i>(Does not apply to school sites approved by CDE prior to January 1, 1997.)</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
k. Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
l. If a response action is necessary and proposed as part of this project, has it been developed to be protective of children's health, with an ample margin of safety?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

### 3.9.1 Impact Analysis

- a. *Would the project create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?*

Construction of the proposed project would require the transport and use of small quantities of hazardous materials in the form of gasoline, diesel, and oil. There is the potential for small leaks due to refueling of construction equipment; however, implementation of Best Management Practices (BMPs) identified in construction specification plans would reduce the potential for accidental release of construction-related fuels and other hazardous materials. These BMPs would prevent, minimize, or remedy storm water contamination from spills or leaks, control the amount of runoff from the site, and require proper disposal and handling of hazardous materials.

Any on-site storage, transport, or use of hazardous materials during the operation of the proposed project would comply with local, state, and federal regulatory requirements. Therefore, impacts associated with a potential hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials would be less than significant.

- b. *Would the project 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?*

Construction of the proposed project would require the transport and use of small quantities of hazardous materials in the form of gasoline, diesel, and oil. There is the potential for accidental release of hazardous materials; however, implementation of BMPs identified in construction specification plans would reduce the potential for accidental release of construction-related fuels and other hazardous materials. These BMPs would prevent, minimize, or remedy storm water contamination from spills or leaks, control the amount of runoff from the site, and require proper disposal and handling of hazardous materials.

Any on-site storage, transport, or use of hazardous materials during the operation of the proposed project would comply with local, state, and federal regulatory requirements.

Therefore, impacts associated with a potential hazard to the public or the environment due to accidental release of hazardous materials would be less than significant.

- c. *Would the project emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?*

The proposed project, which would be located on the Venture Academy campus, would include the storage, transport, and use of fuels and other hazardous materials commonly associated with construction activities. All chemical transport, storage, and use would comply with Resource Conservation and Recovery Act (RCRA); Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA); California hazardous

waste control law; and Occupational Safety and Health Administration (OSHA) requirements. With the required regulation compliance, potential impacts from the storage, transport, and use of fuels and other hazardous materials to the public or the environment would be less than significant.

- d. *Would the project 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?*

According to the Department of Toxic Substances Envirostor website, the proposed project is not located on a site which is included on a list of hazardous materials sites nor are there any listed sites within 1,000 feet of the proposed project area.<sup>9</sup> There would be no impact associated hazardous materials listings.

- e. *Would the project be located within an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?*

The runway of the Stockton Metropolitan Airport is located approximately 0.85 mile southwest of the project area. The proposed project is located in Zone 7a of the Stockton Metropolitan Airport Land Use Compatibility Plan Update (ALUP). The ALUP prohibits outdoor stadiums in Zone 7a;<sup>10</sup> however, the project does not involve the construction/operation of an outdoor stadium or similar uses with very high intensity. Rather the project involves the conversion of the natural grass athletic field to synthetic turf. The project would not increase intensity of the existing use and would continue to be used for school physical education classes and organized recreational uses after school. This impact would be less than significant.

- f. *Would the project impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?*

The proposed project is not expected to interfere with road access, adopted emergency response plan or emergency evacuation plans for safety vehicles or personnel. The construction of the project would not generate excessive traffic for the area but will temporarily increase traffic on the surface roads traveled to and from the site. The proposed project would include transport of construction equipment during the mobilization phase; however, the volume of equipment is not anticipated to result in significant congestion on roads that serve as emergency response and evacuation routes. The proposed project would not introduce new traffic-inducing uses that would result in congested roadways; therefore, the proposed project would not impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

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<sup>9</sup> California Department of Toxic Substances. 2023. EnviroStor website. Available: [https://www.envirostor.dtsc.ca.gov/public/map/?global\\_id=71003576](https://www.envirostor.dtsc.ca.gov/public/map/?global_id=71003576). Accessed April 2023.

<sup>10</sup> Stockton Metropolitan Airport. 2016. Airport Land Use Compatibility Plan Update for Stockton Metropolitan Airport. May 2016 (amended February 2018).



- g. Would the project expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?*

The California Department of Forestry and Fire Protection (CALFIRE) developed Fire Hazard Severity Zones (FHSZ) for State Responsibility Areas (SRA) and Local Responsibility Areas (LRA). The project site is located in an LRA area with a non-fire hazard designation. Therefore, the project would not result in exposure of people or structures to significant risk of loss injury or death as a result of wildland fire hazards.

- h. Is the property line of the proposed school site less than the following distances from the edge of respective powerline easements: (1) 100 feet of a 50-133 kV line; (2) 150 feet of a 220-230 kV line; or (3) 350 feet of a 500-550 kV line?*

Pursuant to CCR, Title 5, Section 14010(c), the property line for a new school site shall not be the following minimum distances from the edge of a high-voltage power line easement: 100 feet for 50-133 kilovolt (kV) lines; 150 feet for 220-230 kV lines; and 350 feet for 500-550 kV lines. Local utility lines are located along the northern border of the project site; however, these lines would remain and would not be affected by the proposed project. This impact would be less than significant.

- i. Is the proposed school site located near an aboveground water or fuel storage tank or within 1,500 feet of an easement of an aboveground or underground pipeline that can pose a safety hazard to the site?*

Based on an online records search of the National Pipeline Mapping System, no hazardous liquid pipelines occur within 1,500 feet of the project site; however, a gas transmission pipeline is located within Arch Airport Road approximately immediately south of the project site.<sup>11</sup> Additionally, the project site does not contain an aboveground water tank. The proposed project would replace the natural grass field with synthetic turf on an existing school campus. Because the proposed project would not site a new school within 1,500 feet of water/fuel storage tanks or pipelines, construction and operation of the project would result in a less-than-significant impact with regard to safety hazards.

- j. Is the school site in an area designated in a city, county, or city and county general plan for agricultural use and zoned for agricultural production, and if so, do neighboring agricultural uses have the potential to result in any public health and safety issues that may affect the pupils and employees at the school site? (Does not apply to school sites approved by CDE prior to January 1, 1997.)*

The project site is designated as Industrial on the Stockton General Plan Land Use Map. Parcels to the south of the project site are designated as agriculture land uses; however, the project site is separated by Arch Airport Road, which would provide a safety buffer between the proposed use and the existing agricultural uses. This impact would be less than significant.

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<sup>11</sup> National Pipeline Mapping System. 2023. Public Viewer.  
<https://pvnpm.phmsa.dot.gov/PublicViewer/> Accessed May 2023.

*k. Does the project site contain a current or former hazardous waste disposal site or solid waste disposal site and, if so, have the wastes been removed?*

According to the Department of Toxic Substances Envirostor website, the proposed project is not located on a site which is included on a list of hazardous materials sites nor are there any listed sites within 1,000 feet of the proposed project area.<sup>12</sup> There is no impact associated hazardous materials listings.

*l. If a response action is necessary and proposed as part of this project, has it been developed to be protective of children's health, with an ample margin of safety?*

As discussed in Response 3.9.1(k), the proposed project is not located on a site which is included on a list of hazardous materials sites. No response action is necessary. No impact would result from the need for a response action.

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<sup>12</sup> California Department of Toxic Substances. 2023. EnviroStor website. Available: [https://www.envirostor.dtsc.ca.gov/public/map/?global\\_id=71003576](https://www.envirostor.dtsc.ca.gov/public/map/?global_id=71003576). Accessed April 2023.



### 3.10 HYDROLOGY AND WATER QUALITY

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i. Result in substantial erosion or siltation on- or off-site;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.10.1 Impact Analysis

- a. *Would the project violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?*

Development of a property may result in two types of water quality impacts: (1) short-term impacts due to construction related discharges; and (2) long-term impacts from operation or changes in site runoff characteristics. Runoff may carry on-site surface pollutants to water bodies such as lakes, streams, and rivers that ultimately drain to the ocean. Projects that increase urban runoff may indirectly increase local and regional flooding intensity and erosion.

As required by the State Water Resources Control Board's (SWRCB) National Pollutant Discharge Elimination System (NPDES) General Permit (No. 2012-0006-DWQ) for stormwater discharges associated with construction and land disturbance activities, SJCOE must develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies BMPs to prevent construction pollutants from contacting stormwater, with the intent of keeping all products of erosion from moving offsite. SJCOE would be required to comply with the Construction General Permit because project-related construction activities would

result in soil disturbances of at least 1 acre of total land area. **Mitigation Measure HYD-1** requires the preparation and implementation of a SWPPP to comply with the Construction General Permit requirements. With implementation of Mitigation Measure HYD-1, the project would not violate any water quality standards or waste discharge requirements (WDRs) during the construction period, and impacts would be less than significant.

The project would not increase the intensity of use from that presently found on-site. Project operation would not alter the runoff presently leaving the site. Therefore, potential violations of water quality standards or waste discharge requirements would be less than significant during project operation.

*b. Would the project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?*

The proposed project does not propose the installation of any water wells that would directly extract groundwater. Additionally, the increase in impervious surface cover that would occur with the proposed project would be negligible and would not reduce the amount of water percolating down into the ground. Therefore, impacts to groundwater supplies or recharge would be less than significant.

*c. Would the project substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:*

*i. Result in substantial erosion or siltation on- or off-site;*

The proposed project is situated on relatively flat topography. Construction of the proposed project would require minimal ground disturbance associated with installation of the light standards and improvements within the project area. Impacts associated with erosion or siltation would be less than significant.

*ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;*

The proposed project would increase the impervious surface at the project site at the bases of the proposed light standards and placement of the bleachers. The increase in impervious surface would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite. This impact would be less than significant.

- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or*

The project site is located on the grounds of the existing school campus that is served by a developed stormwater drainage system. Flood control in the vicinity is provided by a network of underground storm drainpipes. No substantial changes to the existing drainage pattern of the area are proposed, and no streams, rivers, or drainage channels that contribute runoff to the local drainage network would be impacted by the project. No impact would occur.

- iv. Impede or redirect flood flows?*

The project is located in an area of minimal flood hazard. The project would not place structures within a 100-year flood hazard area that would impede or redirect flood flows; therefore, this impact would be less than significant.

- d. In flood hazard, tsunami, or seiche zones, would the project risk release of pollutants due to project inundation?*

The proposed project site is not located within a Federal Emergency Management Agency designated 100-year floodplain; however, approximately 0.1 acre of the northwest portion of the project site is designated 500-year floodplain. The project site is generally level and is not immediately adjacent to any hillsides. As such, the risk from flooding would be low. Furthermore, no enclosed bodies of water are in close enough proximity that would create a potential risk for seiche or a tsunami at the project site. Therefore, there would be no impact related to potential hazards from inundation from flood, tsunami, or seiche.

- e. Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?*

Pollutants of concern during construction include sediment, trash, petroleum products, concrete waste (dry and wet), sanitary waste, and chemicals. Each of these pollutants on its own or in combination with other pollutants can have a detrimental effect on water quality. During construction activities, excavated soil would be exposed, and there would be an increased potential for soil erosion and sedimentation compared to existing conditions. In addition, chemicals, liquid products, petroleum products (such as paints, solvents, and fuels), and concrete-related waste may be spilled or leaked during construction. These pollutants may percolate to shallow groundwater from construction activities. However, required compliance with State and local regulations regarding stormwater and dewatering during construction would ensure that the proposed project would result in less-than-significant impacts to water quality during construction.

During operation of the proposed project, stormwater runoff would drain into the City's drainage system. The proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. This impact is considered less than significant.

### 3.10.2 Mitigation Measures

**Mitigation Measure HYD-1:** Prior to ground-disturbing activities, the San Joaquin County Office of Education shall prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) that specifies best management practices (BMPs) with the intent of keeping all products of erosion from moving offsite. The SWPPP shall include a site map that shows the construction site perimeter, existing and proposed man-made facilities, stormwater collection and discharge points, general topography both before and after construction, and drainage patterns across the project site. Additionally, the SWPPP shall contain a visual monitoring program and a chemical monitoring program for non-visible pollutants to be implemented (if there is a failure of BMPs). The requirements of the SWPPP and BMPs shall be incorporated into design specifications and construction contracts. Recommended BMPs for the construction phase may include the following:

- Stockpiling and disposing of demolition debris, concrete, and soil properly;
- Protecting any existing storm drain inlets and stabilizing disturbed areas;
- Implementing erosion controls;
- Properly managing construction materials; and
- Managing waste, aggressively controlling litter, and implementing sediment controls.

### 3.11 LAND USE AND PLANNING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.11.1 Impact Analysis

*a. Would the project physically divide an established community?*

The project would be located on an existing school campus that currently supports the athletic field. The project would install 32 LED light fixtures atop maximum height 70-foot-tall steel poles around the perimeter of the field and bleachers. Connectivity between the project site and surrounding areas would be maintained, and no division of an established community would occur. Therefore, no impact would occur.

*b. Would the project cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?*

The project site is zoned as Industrial General and identified as an Industrial use in the City of Stockton General Plan. The project does not propose to change the site's existing zoning or land use designation. The proposed project would comply with applicable land use requirements, policies, zoning, and development standards as required by California law for school districts, and adhere to other applicable state codes and regulations. The project would not conflict with any existing state, regional, county, or local laws, policies, regulations, plans or guidelines. Therefore, this impact would be less than significant.

### 3.12 MINERAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 3.12.1 Impact Analysis

- a. *Would the project 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?*

No known mineral resources exist on the project site or surrounding properties. Additionally, the project site is not within a mineral resource zone as designated by the California Department of Conservation's Division of Mine Reclamation, Mineral Land Classification map<sup>13</sup>. Therefore, implementation of the project would not result in loss of availability of a known mineral resource. No impact would occur.

- b. *Would the project 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?*

The project site and surrounding properties are not designated or zoned for mineral extraction uses in the Stockton General Plan. No impact would occur.

<sup>13</sup> California Department of Conservation. 2023. Mineral Land Classification. <https://maps.conservation.ca.gov/cgs/informationwarehouse/index.html?map=mlc>. Accessed May 2023.

### 3.13 NOISE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project result in:				
a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Generation of excessive groundborne vibration or groundborne noise levels?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the education program?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.13.1 Impact Analysis

- a. *Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?*

Noise impacts from construction activities are a function of the noise generated by the operation of construction equipment and on-road delivery and worker commuter vehicles, the location of equipment, and the timing and duration of the noise-generating activities. For the purpose of this analysis, it was estimated that the construction of the proposed project would begin in Fall 2023 and be completed in 6 months.

The City of Stockton Code Noise Control Ordinance has performance standards in order to prevent unnecessary, offensive, or excessive noise levels within the City.<sup>14</sup> For example, Section 8.20.030(A) of the City of Stockton Code establishes that General Noise Regulations stating the standards which shall be considered in determining whether a violation of noise regulations consists of (but is not limited to) considerations such as the nature of the noise (usual or unusual), the proximity of the noise to residential sleeping facilities, the duration, the intensity, and the time of day or night the noise occurs. Noise associated with the proposed construction, paving, or grading is considered usual, provided these activities do not occur between the hours of 8:00 p.m. and 6:00 a.m. on weekdays and Friday commencing at 8:00 p.m. through and including 7:00 a.m. on Saturday.

Average noise levels from construction activities would be higher than the ambient noise levels in the site vicinity for the 6-month construction window. Construction noise levels

<sup>14</sup> City of Stockton. Municipal Code. <https://qcode.us/codes/stockton/> Accessed May 2023.



would fluctuate as activities start and stop and as workers and equipment move around the site. However, given the temporary nature of the construction activities, the noise levels anticipated during construction, and compliance with the City's Noise Ordinance (construction activities limited between 6:00 a.m. and 8:00 p.m., Monday through Friday and 7:00 a.m. and 8:00 p.m. on Saturday), this impact would be less than significant. Further, SJCOE would require the contractor to implement measures and methods that would ensure compliance with the City Noise Ordinance's average sound level limits. As such, temporary construction noise levels would not exceed levels established by the City's Noise Ordinance and noise impacts during the daytime would be less than significant.

*b. Would the project result in generation of excessive groundborne vibration or groundborne noise levels?*

Construction activities that might expose persons to excessive ground borne vibration or ground borne noise have the potential to cause a significant impact. Ground borne vibration information related to construction/heavy equipment activities has been collected by the California Department of Transportation (Caltrans). The Caltrans data indicates that transient vibrations (such as from demolition activity) with a peak particle velocity (PPV) of approximately 0.035 inches per second may be characterized as barely perceptible, and vibration levels up to 0.25 inches per second may be characterized as distinctly perceptible.<sup>15</sup> Caltrans uses a damage threshold of 0.2 inches per second PPV for conventional buildings.

Ground borne vibration is typically attenuated over relatively short distances. With the anticipated construction equipment, construction-related vibration levels would be approximately 0.127 inches per second PPV at 25 feet from the construction area (assuming simultaneous operation of a caisson drill, a jackhammer, and a small bulldozer). At 25 feet, this vibration would be above the threshold of "barely perceptible" level of 0.035 inches per second PPV; however, the nearest residence is located on the east side of Highway 99 approximately 1.5 miles from the nearest construction area. Additionally, this vibration level (at 25 feet) is well below the distinctly perceptible level of 0.25 inches per second PPV.<sup>16</sup> The expected vibration level at the residential buildings is also expected to be below the Caltrans damage threshold for conventional buildings. Therefore, impacts related to ground borne vibration would be less than significant.

*c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 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?*

The runway of the Stockton Metropolitan Airport is located approximately 0.85 mile southwest of the project area. The proposed project is located in Zone 7a of the Stockton

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<sup>15</sup> Caltrans (California Department of Transportation). 2013. Transportation- and Construction-Induced Vibration Guidance Manual. Sacramento, California: Caltrans Noise, Vibration and Hazardous Waste Management Office. September 2013.

<sup>16</sup> Ibid.



Metropolitan Airport Land Use Compatibility Plan Update.<sup>17</sup> The ALUP prohibits outdoor stadiums in Zone 7a; however, the project does not involve the construction/operation of an outdoor stadium or similar uses with very high intensity. Rather the project involves the conversion of the natural grass athletic field to synthetic turf. The project would not increase intensity of the existing use and would continue to be used for school physical education classes and organized recreational uses after school. The impact associated with proximity to a public airport and/or exposure of people residing or working in the area to noise from the airport would be less than significant.

*d. Is the proposed school site located adjacent to or near a major arterial roadway or freeway whose noise generation may adversely affect the education program?*

The proposed project would be located on an existing school campus. As shown in Figure 4.11-1 of the City of Stockton General Plan Draft EIR, Arch Airport Road, Pock Lane, and Highway 99 are noise-generating roadways in the vicinity of the proposed project area. The proposed project site is not within the 60 dB noise contours for any of the three roadways. The proposed project would not locate any of these roadways closer to the school site than are present under existing conditions. This impact would be less than significant.

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<sup>17</sup> Stockton Metropolitan Airport. 2016. Airport Land Use Compatibility Plan Update for Stockton Metropolitan Airport. May 2016 (amended February 2018).

### 3.14 POPULATION AND HOUSING

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 3.14.1 Impact Analysis

- a. *Would the project induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?*

The installation of field lighting and placement of synthetic turf on the athletic field at the project site would serve the existing school and surrounding community population and would not induce population growth. Furthermore, the proposed project would not increase the capacity at the school; therefore, there would be no impact related to unplanned population growth.

- b. *Would the project displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?*

The project site includes existing athletic field on the existing Venture Academy campus and does not contain housing. Therefore, no housing would be displaced, and there would be no impact to existing housing.

### 3.15 PUBLIC SERVICES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
i. Fire protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
v. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the site promote joint use of parks, libraries, museums, and other public services?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.15.1 Impact Analysis

- a. *Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:*

i. *Fire protection?*

Fire protection for the proposed project site is provided by the Montezuma Fire Protection District. The nearest Fire Station is Fire Station 2, located approximately 2.5 miles southwest of the proposed project area. The proposed project would not generate population growth or add people to the area. Thus, the proposed project would not generate the need for additional fire services that would require new or physically altered facilities. No impact to fire services would occur.

ii. *Police protection?*

Police protection for the proposed project site is provided by the Stockton Police Department. The proposed project would not generate population growth or add people to the area. Thus, the proposed project would not generate the need for additional police services that would require new or physically altered facilities. No impact to police services would occur.

*iii. Schools?*

The proposed project would install light standards and replace the natural grass of the athletic field with synthetic turf at the existing Venture Academy campus. The proposed project would serve the existing population and would not induce population growth. Therefore, the proposed project would not increase demand for schools or necessitate construction of new school facilities. No impact would occur.

*v. Parks?*

The proposed project would install light standards and replace the natural grass of the athletic field with synthetic turf at the existing Venture Academy campus. The proposed project would serve the existing population and would not induce population growth. Therefore, the proposed project would not increase demand for parks. No impact would occur.

*v. Other public facilities?*

The proposed project would install light standards and replace the natural grass of the athletic field with synthetic turf at the existing Venture Academy campus. The proposed project would serve the existing population and would not induce population growth. Therefore, the proposed project would not increase demand for public facilities or services. No impact would occur.

*b. Does the site promote joint use of parks, libraries, museums, and other public services?*

The Civic Center Act, as defined in the State of California Education Code Sections 38130-38139, describes the uses of school facilities, including all buildings and grounds for public purposes, and the fees that may be assessed. Section 38131(b)(1) states:

“(b) The governing board of any school district may grant the use of school facilities or grounds as a civic center upon the terms and conditions the board deems proper, subject to the limitations, requirements, and restrictions set forth in this article, for any of the following purposes: (1) Public, literary, scientific, recreational, educational, or public agency meetings . . . (6) Supervised recreational activities including, but not limited to, sports league activities for youths that are arranged for and supervised by entities, including religious organizations or churches, and in which youths may participate regardless of religious belief or denomination” (California Education Code 1996).

The proposed project site would be available for use per Civic Center Act requirements. Therefore, the project does promote the joint use of athletic facility located onsite. This impact would be less than significant.

### 3.16 RECREATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 3.16.1 Impact Analysis

- a. *Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?*

The proposed project would install light standards and replace the natural grass of the athletic field with synthetic turf at the existing Venture Academy campus. The project would serve the region's existing population and would not induce population growth. However, new lighting installed at the athletic field would facilitate nighttime use of the field. Nighttime use of the field could occur up to seven days per week, and hours of operation would be until 10:00 p.m. While the proposed project would extend the hours of operation/use of the athletic field, regular and continued maintenance of the fields by field maintenance staff would ensure that substantial deterioration of the fields would not occur or be accelerated. Therefore, impacts would be less than significant.

- b. *Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?*

The proposed project would not demolish existing recreational facilities and would not construct new or expand current recreational facilities. The proposed project would install light standards and replace the natural grass of the athletic field with synthetic turf at the existing Venture Academy campus. The proposed project does not include new recreational facilities and would not require the construction or expansion of recreational facilities. Therefore, no impact would occur.

### 3.17 TRANSPORTATION

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Is the proposed school site within 1,500 feet of a railroad track easement?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f. Is the site easily accessible from arterials and is the minimum peripheral visibility maintained for driveways per Caltrans' Highway Design Manual?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g. Are traffic and pedestrian hazards mitigated per Caltrans' School Area Pedestrian Safety manual?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### 3.17.1 Impact Analysis

- a. *Would the project conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?*

Project construction activities associated with the installation of light standards and installation of synthetic turf on the athletic field would occur over a 6-month period. During project construction, the proposed project would not require closure of any streets or interfere with vehicle, pedestrian, bicycle, or mass transit access. During project construction, vehicles would access work areas directly and would not be staged on the street. Due to the low number of workers required during construction and the hours of construction (6:00 a.m. to 8:00 p.m. weekdays), construction traffic would not substantially change the number vehicle trips on the surrounding roadway network. Therefore, project construction would not cause changes to delay at any intersection, or operation of a roadway segment or freeway segment.

During operations, the extended hours of field use enabled by the proposed field lighting could result in additional trips in the local area to the athletics field. However, the SJCOE anticipates the project would not change the existing land use and would not cause a substantial change in trip generation compared to existing conditions.

Because the proposed project would not result in a substantial increase in traffic on local streets, impacts related to conflicts with an applicable plan, ordinance, or policy establishing measures of effectiveness for the performance of the circulation system would be less than significant.

*b. Would the project conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b)?*

On September 27, 2013, Governor Jerry Brown signed Senate Bill (SB) 743 into law and started a process that changes the methodology of a transportation impact analysis as part of CEQA requirements. SB 743 directed the California Office of Planning and Research to establish new CEQA guidance for jurisdictions that removes the level of service (LOS) method, which focuses on automobile vehicle delay and other similar measures of vehicular capacity or traffic congestion, from CEQA transportation analysis.

Rather, vehicle miles traveled (VMT), or other measures that promote “the reduction of greenhouse gas emissions, the development of multimodal transportation networks, and a diversity of land uses,” are now be used as the basis for determining significant transportation impacts in the State.

As the proposed project would only include installation of light standards and installation of synthetic turf on the existing athletic field, operation of the proposed project would not result in a substantial increase in traffic on local streets. Implementation of the proposed project would not disrupt or otherwise prevent roadway improvements, including the addition of bike paths or sidewalks in the vicinity of the project site. The project would also not disrupt existing transit services. As such, implementation of the proposed project is not anticipated to generate a substantial increase in VMT and would not conflict with goals related to the reduction of VMT and compliance with SB 743. Therefore, the project would be consistent with State CEQA Guidelines Section 15064.3. Implementation of the proposed project would result in less-than-significant VMT impacts, and no mitigation would be required.

*c. Would the project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

The proposed project would install light standards and replace the natural grass of the athletic field with synthetic turf at the existing Venture Academy campus. The proposed project would not result in changes to or interfere with the City’s vehicular, bicycle, or pedestrian transportation system or increase hazards or incompatible uses. Therefore, there would be no impact regarding hazards due to a design feature or incompatible use.

*d. Would the project result in inadequate emergency access?*

Access to the proposed project site is from Transworld Drive. The proposed project would not require closure of any streets and would not interfere with emergency access to the proposed project site or surrounding area. During project construction, vehicles would access the work areas directly and would not be staged on the surrounding streets. Therefore, no impact related to interference with an adopted emergency response plan or emergency evacuation plan would occur.

*e. Is the proposed school site within 1,500 feet of a railroad track easement?*

No railroad track easement is located within 1,500 feet of the proposed project site. The nearest rail corridor is a spur line located approximately 2.7 miles west of the proposed project site.

*f. Is the site easily accessible from arterials and is the minimum peripheral visibility maintained for driveways per Caltrans' Highway Design Manual?*

The existing school site and primary access point for the proposed project is located on Transworld Drive. As no changes to existing streets and access driveways are proposed, no impacts related to access and peripheral visibility would occur.

*g. Are traffic and pedestrian hazards mitigated per Caltrans' School Area Pedestrian Safety manual?*

Currently, walkways exist in the vicinity of the proposed project site are along Transworld Drive. The proposed project is internal to the existing Venture Academy campus and does not include modification to existing pedestrian facilities; therefore, there would be no impact to traffic and pedestrian facilities.



### 3.18 TRIBAL CULTURAL RESOURCES

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### 3.18.1 Impact Analysis

- a. *Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:*
- i. *Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k)? Or*

The SJCOE requested a Sacred Lands Inventory on file with the Native American Heritage Commission (NAHC) in May 2023. The NAHC indicated the Sacred Lands File search resulted in positive results. Based on the NAHC list of tribal representatives, the SJCOE notified 17 Native American tribal representatives consistent with AB 52 requirements (see Appendix B). As a result of the notifications, the Confederated Villages of Lisjan Nation requested that SJCOE provide the final California Historical Resources Information System, project environmental impact report, Sacred Lands File, and other relevant information. SJCOE has provided the available items to the Tribe. The SJCOE is in continued coordination with the Tribe. In the event that other tribal representatives express interest in the project and/or the project area, the District will coordinate with the tribes to address any concerns. In the unlikely event that unrecorded resources are discovered during construction activities, implementation of Mitigation

Measures CULT-1 and CULT-2 (see Section 3.5.2) would reduce this potential impact to less than significant.

- ii. *A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1? In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.*

The SJCOE requested a Sacred Lands Inventory on file with the NAHC, to date, a response has not been received; however, the SJCOE notified 17 Native American tribal representatives consistent with AB 52 requirements (see Appendix B). The Confederated Villages of Lisjan Nation requested that SJCOE provide the final California Historical Resources Information System, project environmental impact report, Sacred Lands File, and other relevant information. SJCOE has provided the available items to the Tribe. The SJCOE is in continued coordination with the Tribe. In the event that other tribal representatives express interest in the project and/or the project area, the District will coordinate with the tribes to address any concerns. In the unlikely event that unrecorded resources are discovered during construction activities, implementation of Mitigation Measures CULT-1 and CULT-2 (see Section 3.5.2) would reduce this potential impact to less than significant.

### 3.19 UTILITIES AND SERVICE SYSTEMS

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
Would the project:				
a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

#### 3.19.1 Impact Analysis

- a. *Would the project require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?*

The proposed project would install light standards and replace the natural grass of the athletic field with synthetic turf at the existing Venture Academy campus. Construction of the proposed project would require the use of water and wastewater systems. Operation of the proposed project would not require an increase in the use of water as the project would no longer require irrigation of the athletic field. The project proposes no changes to wastewater systems. The utility services required of the proposed project would not necessitate the relocation or construction of new or expanded facilities. This impact would be less than significant.

- b. *Would the project have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?*

The proposed project would install light standards and replace the natural grass of the athletic field with synthetic turf at the existing Venture Academy campus. Construction of the proposed project would require the use of water for dust suppression. Operation of the proposed project would not require an increase in the use of water as the project would no

longer require irrigation of the athletic field. The proposed project would not result in a substantial increase in water use. This impact would be less than significant.

- c. Would the project result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?*

The proposed project would install light standards and replace the natural grass of the athletic field with synthetic turf at the existing Venture Academy campus. Operation of the proposed project would reduce water usage (i.e., no irrigation of the athletic field) and would result in no change in wastewater systems. Therefore, the proposed project would not exceed the current wastewater treatment requirements at the site. This impact would be less than significant.

- d. Would the project generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?*

Construction of the proposed project would produce minimal quantities of solid waste during project construction. The 2019 CalGreen Code (Title 24, Part 11 of the California Code of Regulations) requires all construction contractors to reduce construction waste and demolition debris by 65 percent. Code requirements include preparing a construction waste management plan that identifies the materials to be diverted from disposal by efficient usage, recycling, reuse on the project, or salvage for future use or sale; determining whether materials will be sorted on-site or mixed; and identifying diversion facilities where the materials collected will be taken. The code also specifies that the amount of materials diverted should be calculated by weight or volume, but not by both (California Building Standards Commission 2019). In addition, the 2019 CalGreen Code requires that 100 percent of trees, stumps, rocks, and associated vegetation and soils resulting primarily from land clearing be reused or recycled.

Additionally, operation of the proposed project would not result in an increase in solid waste generation from the project site above what is currently generated onsite.

The project would comply with all statutes and regulations related to solid waste. Compliance with the CalGreen Code and AB 1826 would ensure that sufficient landfill capacity would be available to accommodate solid-waste disposal needs for future development. Therefore, the project would have a less than significant impact.

- e. Would the project comply with federal, state, and local management and reduction statutes and regulations related to solid waste?*

The proposed project would install light standards and replace the natural grass of the athletic field with synthetic turf at the existing Venture Academy campus and would produce minimal quantities of solid waste during project construction. The proposed project would comply with federal, state, and local statutes and regulations related to solid waste and solid waste reduction during project construction and operation. Therefore, the proposed project would result in less than significant impacts related to solid waste regulations.

## 3.20 WILDFIRE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

### 3.20.1 Impact Analysis

- a. *Would the project substantially impair an adopted emergency response plan or emergency evacuation plan?*

The proposed project would not interfere with implementation of an emergency response plan or evacuation. There would be no impact.

- b. *Would the project, due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?*

The California Department of Forestry and Fire Protection (CALFIRE) developed Fire Hazard Severity Zones (FHSZ) for State Responsibility Areas (SRA) and Local Responsibility Areas (LRA). The proposed project site is located in an LRA area with a non-fire hazard designation. The proposed project site is not located in or near a Very High Fire Hazard Severity Zone (VHFHSZ) nor is it located in or near a SRA. Therefore, the proposed project would not exacerbate wildfire risks due to slope and prevailing winds, thereby exposing project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. As a result, a less than significant impact would occur, and no mitigation would be required.

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

The proposed project would not require the installation or maintenance of infrastructure that may exacerbate fire risk. No impact would occur.

- d. *Would the project expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?*

Landslides and other forms of mass wasting, including mud flows, debris flows, and soil slips, occur as soil moves downslope under the influence of gravity. Landslides are frequently triggered by intense rainfall or seismic shaking but can also occur as a result of erosion and downslope runoff caused by rain following a fire. Because the proposed project site is level, the proposed project would not expose people or structures to potential substantial adverse effects associated with landslides. Further, the proposed project site is not located in or near a VHFHSZ nor is it located in or near a SRA. Therefore, the proposed project would not expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes. As a result, a less-than-significant impact would occur, and no mitigation would be required.

### 3.21 MANDATORY FINDINGS OF SIGNIFICANCE

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
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.)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### 3.21.1 Impact Analysis

- a. *Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

Implementation of the mitigation measures recommended in this Initial Study would ensure that construction and operation of the proposed project would not substantially degrade the quality of the environment; reduce the habitat, population, or range of a plant or animal species; or eliminate important examples of California history or prehistory.

- 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)?*

The potential impacts of the proposed project are individually limited and are not cumulatively considerable. Implementation of mitigation measures recommended in this report would reduce potentially significant impacts that could become cumulatively considerable.

- c. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?*

The proposed project would be constructed and operated in accordance with all applicable regulations governing hazardous materials, noise, and geotechnical considerations. Because all potentially significant impacts of the proposed project are expected to be mitigated to less than significant levels, it is unlikely that implementation of the proposed project would cause substantial adverse effects on human beings. As a result, less than significant impacts would occur with implementation of the recommended mitigation measures.



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## APPENDIX A

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