

APPENDIX A

Notice of Preparation and Responses to the NOP



NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT KATHERINE JOHNSON MIDDLE SCHOOL

DATE: June 10, 2022

TO: Responsible and Trustee Agencies, Interested Parties, and Organizations

SUBJECT: Notice of Preparation of an Environmental Impact Report for the Katherine Johnson Middle School

The San Juan Unified School District (SJUSD or “the District”) will be the lead agency and will prepare an Environmental Impact Report (EIR) compliant with the California Environmental Quality Act (CEQA) for the proposed Katherine Johnson Middle School Project (also referred to as “the project” or “the proposed project”). An Initial Study will not be prepared (CEQA Guidelines Section 15063[a]). In accordance with Section 15082 of the CEQA Guidelines, this Notice of Preparation (NOP) provides the project location, a brief project description, and a summary of the potential environmental effects of the proposed project.

The purpose of this NOP is to provide an opportunity to comment on the scope and proposed content of the EIR. The District will rely on responsible and trustee agencies to provide information relevant to the analysis of resources falling within the jurisdiction of such agencies. Specifically, input is requested on:

1. **Scope of Environmental Analysis**—guidance on the scope of analysis for this EIR, including identification of specific issues that will require closer study due to the location, scale, and character of the project;
2. **Mitigation Measures**—ideas for feasible mitigation, including mitigation that would avoid, eliminate, or reduce potentially significant or significant impacts; and
3. **Alternatives**—suggestions for alternatives to the proposed project that could potentially reduce or avoid potentially significant or significant impacts.

As outlined in CEQA Guidelines Section 15082(b), each responsible and trustee agency must identify specific environmental issues, alternatives, and mitigation measures that should be explored in the EIR. If there is no response within 30 days, the District will assume that there are no specific environmental issues, alternatives, or mitigation measures that the responsible and trustee agencies believe should be incorporated into the EIR.

WRITTEN COMMENTS

Please provide your written comments before July 11, 2022. Comments, along with the name and contact information of the appropriate person in your organization, should be addressed to:

Nicholas Arps, Director of Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608
(916) 971-7700
construction@sanjuan.edu

Documents related to this project will be available for review on the SJUSD’s website at: [Facilities / Katherine Johnson Middle School \(sanjuan.edu\)](#)

PROJECT LOCATION AND SURROUNDING LAND USES

The approximately 9.75-acre project site is situated in unincorporated Sacramento County, east of the Sacramento City limits, in the urbanized Arden-Arcade Community (Exhibit 1). The project site is located at 2641 Kent Drive (APN 268-0290-001-0000), and is bounded by Miramar Road on the south, Belpoint Lane on the west, private residences adjacent to Lacy Lane on the north, and private residences adjacent to Creekside Lane and Cresthaven Drive on the east (Exhibit 2).

The project site is zoned RD-5 Residential. The Sacramento County General Plan land use designation is Low Density Residential, and the Arden-Arcade Community Plan land use designation is RD-5/Public-Quasi Public (PQP). Public schools are a permitted, primary use under the current Sacramento County Zoning Code in areas zoned RD-5. The project site was developed as a public school (the Creekside Elementary School) in 1953.

The San Juan Unified School District now uses the existing Creekside school site for adult education. Known as the Creekside Adult Center, this site is used in conjunction with the Sunrise Tech Center to provide ongoing educational opportunities. Current average attendance at the Creekside Adult Center is 300-500, and there is a total of 24 staff and faculty. The Adult Center operates five days a week from September 6th to June 30th, Monday through Friday, from 8 AM – 3:00 PM.

The project site is surrounded on all sides by single-family and multi-family residential development, with the exception of the Town & Country Pre-School and Daycare facility (at 2550 Belpoint Lane), which is immediately adjacent to and south of the project site's southwestern boundary. A small portion of the approximately 1.5-acre Creekside Nature Area, administered by the Fulton-El Camino Recreation and Park District, is adjacent to the project site's northeastern boundary. Chicken Ranch Slough is adjacent to, and runs through a small portion of, the project site's northern boundary.

Two paved local streets—Miramar Road on the east and Elvyra Way on the west—dead-end on either side of the southern portion of the project site.

PROJECT DESCRIPTION

SJUSD is proposing to redevelop a District-owned property in the Arden-Arcade Community, at the former Creekside Elementary School campus and current Creekside Adult Center located at 2641 Kent Drive. All of the existing buildings and facilities associated with the former Creekside Elementary School, which was constructed in 1953, would be demolished and removed. This would involve 25,928 square feet of existing school buildings. A new middle school would be developed in place of the existing facilities.

PROPOSED FACILITIES

The proposed Katherine Johnson Middle School would include construction of approximately 65,000 square feet of school building space. The proposed project would allow for an increase in the maximum student capacity. The current capacity of Katherine Johnson Middle School – currently collocated with Encina High School is 550 students. The proposed school's capacity would accommodate up to 650 students. Approximately 48 staff are projected for the new middle school.

The operations at the Creekside Adult Center will move to the Encina High School campus. This would involve construction of 11 portables (including a double-wide Kinder) and a restroom building, no permanent buildings, and provide for a capacity of up to 30 per class (300 students total).

Several buildings would be constructed in the central part of the campus, including administration, library, and student services; general classrooms; science, art, maker, and special education classrooms; and a multi-purpose building including food service, music, gymnasium, and locker rooms (Exhibit 2). Building exteriors would incorporate modern design features such as cantilevered roofs and covered walkways, architectural coatings designed to reduce glare, and connectivity between indoor and outdoor learning environments. An outdoor science learning area would be provided adjacent to the science education classrooms. An outdoor dining area

with a shade trellis would be provided adjacent to the food service area. The school buildings would be oriented around a central interior quad (gathering space), which would include an outdoor amphitheater. Communications would be facilitated by a public address (PA) system that may be used outdoors around the campus buildings, when necessary. The existing outdoor playfields would be refurbished and redeveloped to include a hardcourt basketball area, and a soccer field in the northern open grassy area of the campus.

All project-related facilities would be designed to meet the requirements of the Division of the State Architect (DSA) and would be constructed in accordance with current building codes.

ACCESS AND ANCILLARY FEATURES

The proposed project also includes installing a driveway through a parking lot in the southern portion of the project site, to connect Elvyra Way on the west with Miramar Road on the east (Exhibit 2). This will create a through connection between Kent Drive and Miramar Road on the east and Belport Lane and Elvyra Way on the west. Associated sidewalk, curb, and gutters would also be constructed. Connecting the two roadways would facilitate school access, including student drop-off and pick up, as well as emergency ingress and egress. North of the proposed driveway and parking lot, a student drop-off and pick-up area would be provided.

Parking for school staff would be provided south of the through driveway. Emergency access within the school campus would be similar to existing conditions, with a travel route for equipment northward from Kent Drive, eastward around the new multi-purpose building, westward around the back of the basketball courts and classroom buildings, and then southward around the science buildings to Belport Lane. Sidewalk, curb, and gutter work associated with the through driveway would be conducted in accordance with Sacramento County Improvement Standards.

Existing chain link fencing around the property would be removed and replaced with new, more modern fencing comprised of iron railings. New landscaping, including shade trees and drought-tolerant shrubs, groundcover, and flowering plants, would be installed around the campus buildings, outdoor learning and gathering areas, and the parking area. A new fence would be installed alongside the existing nature trail south of Chicken Ranch Slough.

Minor outdoor security lighting would be provided on the new school buildings. All nighttime lighting fixtures would be shielded and directed downward to prevent light spillover, consistent with current design practices. The outdoors playfields would not be lighted at night.

The proposed project also includes upgrades to on-site drainage, sewer, water, wastewater, and electrical systems as necessary in coordination with the current utility service providers to support the redeveloped school building space. The project would make improvements to drainage facilities, which may include an upgrade to the existing storm drainage system to increase pipe size from 18" to 36", to be confirmed through further design work.

CONSTRUCTION

All construction equipment and vehicles would be staged on the existing school campus. Demolition and grading would occur on the southern portion of the property as an initial stage of construction in order to accommodate an all-weather area for construction staging and parking for construction worker vehicles.

Project-related demolition and construction is anticipated to take 20 months, starting in January of 2023. Construction activities would be limited to the less-sensitive daytime hours between 6am and 8pm, Monday through Friday. Occasional daytime construction work on Saturdays and Sundays may be necessary and if this occurs, construction would be limited to the hours between 7am and 8pm, accordance with the County's Noise Ordinance, though on weekdays, the District would not typically expect any noise-generating activities until after 7am.

Construction equipment and activities would primarily involve the use of Kent Drive to access El Camino Avenue. Demolition material could be removed using Belport Lane to El Camino Avenue or Kent Drive to El Camino Avenue. Kent Drive would be the main access route for grading and concrete work.

The construction contractor would be responsible for erecting a chain-link fence with fabric screening or webbing around the construction area, to ensure that only authorized construction personnel and District representatives are allowed entry. In addition, warning signs indicating that the construction site poses a hazard to non-authorized personnel along with signs stating “No Admittance” would be posted on the fencing around the site.

PROJECT OBJECTIVES

SJUSD has identified the following Project Objectives to guide planning for the project site, as well as the analysis included within the EIR:

- Implement SJUSD educational facility requirements in a manner that provides a learning environment that meets the needs of today’s student body.
- Provide for the educational needs of up to approximately 650 middle school (grades 6–8) students.
- Meet SJUSD geographical needs for school facilities within its service boundary and the surrounding community, based on the District’s demographic studies.
- Provide school capacity in a central location relative to the anticipated student body to facilitate and promote walking and bicycling to school.
- Provide safe and efficient school site access for students and SJUSD staff.

REQUIRED APPROVALS

The proposed project would be reviewed by the Office of Public School Construction of the California Department of General Services, Division of the State Architect, and by the California Department of Education (CDE). The CDE is responsible for approving the proposed site of any public school in California (Education Code Section 17213) to ensure that the location meets certain specific standards for public health and safety.

Approvals required for the proposed project may include, but are not necessarily limited to:

- California Department of Education/Division of State Architect—final school site and design approval (per California Education Code Section 17213).
- Central Valley Regional Water Quality Control Board—Clean Water Act Section 402 National Pollutant Discharge Elimination System, Stormwater General Permit.
- Sacramento Metropolitan Fire District—site plan review for emergency access and water availability.
- Sacramento Metropolitan Air Quality Management District—Authority to Construct, permit to operate.
- Sacramento Suburban Water District—domestic water supply and fire flow.
- Sacramento Area Sewer District—sewer connections and conveyance.
- Sacramento County—storm drain connection and stormwater runoff treatment, approval of a grading permit, encroachment permit for changes to site access.
- Fulton-El Camino Recreation and Park District for collaboration on design, maintenance, and operation of the proposed nature trail.

ENVIRONMENTAL REVIEW

As required by CEQA, the EIR will describe existing conditions and evaluate the potential environmental effects of the proposed Katherine Johnson Middle School and a reasonable range of alternatives, including the no-project alternative. It will address direct, reasonably foreseeable indirect, cumulative, and growth-inducing effects. The EIR will identify feasible mitigation measures, if available, to reduce significant and potentially significant impacts.

POTENTIAL ENVIRONMENTAL IMPACTS

The following environmental topic areas are preliminarily anticipated to be evaluated in the EIR:

- **Aesthetics, Light and Glare**—The EIR will describe the existing visual conditions and will evaluate the potential impacts on scenic resources and visual character that may result from redevelopment of the project site, as well as impacts related to light and glare. There are no State or locally designated scenic roadways in the project area.
- **Agriculture and Forestry Resources**—The project site is not zoned or designed for agricultural or forestry uses. The project site is not designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance; it is designated by the California Department of Conservation as Urban and Built-Up Land, which does not fall under the Important Farmland umbrella. The project site is not encumbered by a Williamson Act contract. This section will also document that no forest land resources are present.
- **Air Quality**—The EIR will discuss the regional and local air quality setting and quantify air pollutant emissions for construction and subsequent operation of proposed uses. The emissions estimates will be derived in consideration of recommended methods and significance thresholds developed by the Sacramento Metropolitan Air Quality Management District, and the EIR will explain how methods and thresholds are designed to assess potential human health effects.
- **Biological Resources**—The EIR will define the biological resources in the project area, identify existing habitats, and evaluate the project's potential effects on wetlands, other sensitive natural communities, and special-status plant and animal species.
- **Cultural and Tribal Cultural Resources**—The EIR will describe any existing cultural and Tribal Cultural Resources and evaluate potential impacts on those resources, including the potential to affect undiscovered resources during excavation and grading. The EIR will be informed by consultation with California Native American tribes to assess potential impacts on Tribal Cultural Resources.
- **Energy**—The EIR will describe the project's consistency with energy conservation standards and evaluate whether the project would lead to wasteful or inefficient use of energy or affect local or regional energy supplies.
- **Geology, Soils, Minerals, and Paleontology**—The EIR will briefly describe the geological setting and potential environmental effects related to geologic and soils hazards, and unique paleontological (fossil) resources. This section will outline design measures, best management practices, and regulatory requirements to minimize impacts on people or structures from geologic and soil hazards. The EIR will also identify any potential impacts to undiscovered fossils. Deposits of regionally or locally important mineral resources are not present at the project site.
- **Greenhouse Gas Emissions**—The EIR will include a description of the current science surrounding climate change. The EIR will quantify greenhouse gas (GHG) emissions for construction and subsequent operation based on the proposed middle school use. Emissions estimates will be evaluated for consistency with the State legislative framework for reducing GHG emissions reductions.
- **Hazards and Hazardous Materials**—The EIR will identify potential impacts from the transport, use, or disposal of hazardous materials; accidental releases of hazardous materials; emissions of hazardous or

acutely hazardous materials, substances, or waste near a school; proximity to known hazardous materials sites on the Cortese List (California Government Code Section 65962.5); location within an airport land use plan or in the vicinity of a private airstrip; and impairment of an adopted emergency response or evacuation plan.

- **Hydrology and Water Quality**—The EIR will evaluate hydrologic and water quality conditions and potential short-term construction-related effects on water quality from stormwater runoff, as well as longer-term effects on stormwater drainage and maintenance effects on water quality. This section will also evaluate potential impacts related to flooding, impacts on groundwater recharge and sustainability, and impacts on surface water hydrology from the addition of impervious surfaces associated with proposed redevelopment. The potential for the project to impede or redirect flood flows will also be evaluated in this section. This section will outline design features, best management practices, and regulatory requirements required to minimize hydrology and water quality effects.
- **Land Use and Planning**—The EIR will describe existing land uses and zoning and evaluate the potential for the proposed project to divide an existing community, or to conflict with existing, adopted land use and natural resource plans or regulations that were adopted for the purpose of reducing or avoiding environmental effects.
- **Noise and Vibration**—The EIR will describe existing noise and vibration conditions and the potential impacts of construction and operation of the proposed redevelopment. Noise and vibration levels from construction, and noise levels from operation of the proposed middle school use will be estimated and compared with existing ambient noise levels and Sacramento County noise policies.
- **Population and Housing**—The EIR will evaluate the potential for the proposed redevelopment to induce substantial unplanned population growth. Because the project site has been developed as a school since 1953, no impacts are anticipated related to displacing substantial numbers of housing units or people that could lead to potentially significant physical environmental effects.
- **Public Services**—The EIR will describe existing public services related to fire, police, and schools, and will evaluate whether the proposed middle school would result in potential increases in demand. The EIR will evaluate whether those demands would require new facilities, the construction of which could cause significant environmental impacts.
- **Recreation**—The EIR will describe existing recreational facilities in the project area, and will evaluate whether the proposed middle school would result in an increased demand for recreation facilities, and whether any increased use of existing neighborhood and regional parks or other recreational facilities would result in substantial physical deterioration of such facilities.
- **Transportation**—The EIR will identify existing conditions, existing plus project conditions, cumulative no-project conditions, and cumulative plus project conditions. The EIR will summarize an analysis of vehicle miles traveled (VMT) related impacts of the proposed project, and explain that all adverse physical environmental impacts associated with VMT are included in the air quality, greenhouse gas emissions, and other relevant topic sections of the EIR. The proposed project site plan will be evaluated for access and on-site circulation, including interface with the public roadway network, emergency vehicle access and circulation, and pedestrian and bicycle access and circulation within and adjacent to the site. The EIR will include an evaluation of the project's consistency with the County's multi-modal transportation policies.
- **Utilities and Service Systems**—The EIR will evaluate physical environmental impacts related to the provision of utility systems, including water supply, wastewater treatment, and solid waste disposal. Stormwater drainage facilities will be assessed in the Hydrology and Water Quality chapter of the EIR.
- **Wildland Fire Hazards**—The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, the EIR will explain why no significant impacts related to wildland fire hazards would occur.

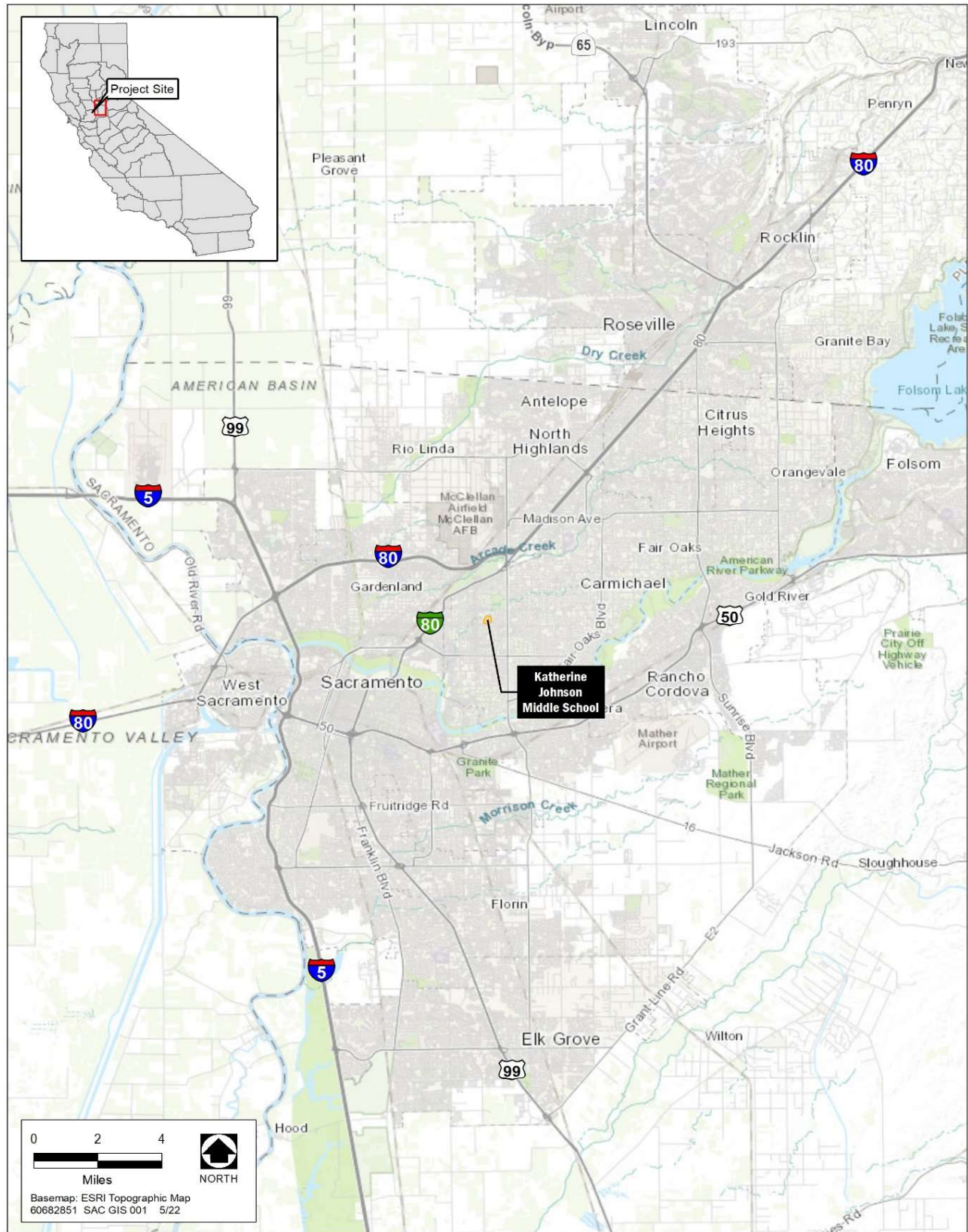


Exhibit 1. Regional Project Location



- A. Administration and Student Services
- B. Classroom Buildings
- C. Classroom Buildings
- D. Science, Art, Maker, and Special Education Classrooms
- L. Library and SPED Classrooms
- M. Multi-Purpose Building, Food Service, Music
- N. Locker Rooms and PE Classrooms



0' 40' 80' 160'

Exhibit 2. Project Site and Conceptual Plan



California Wildlife Foundation/California Oaks, 201 University Avenue, H-43 Berkeley, CA 94710, (510) 763-0282

July 7, 2022

Nicholas Arps, Director of Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608

Submitted via email: construction@sanjuan.edu

RE: Notice of Preparation of an Environmental Impact Report for the Katherine Johnson Middle School, SCH Number 2022060230

Dear Mr. Arps:

The [California Oaks](#) program of [California Wildlife Foundation](#) works to conserve oak ecosystems because of their critical role in sequestering carbon, maintaining healthy watersheds, providing plant and wildlife habitat, and sustaining cultural values. We are writing about potential impacts of Katherine Johnson Middle School construction on oak trees within the project site and along the banks of and within the floodplain of Chicken Ranch Slough at the site, and about access issues at the adjacent Creekside Nature Area.

There are mature oak trees and other large trees within the buildable portion of the project site that we understand are likely to be removed for street and parking lot construction. California Wildlife Foundation/California Oaks recommends that the plan retain as many standing mature native trees as possible because of the shade they provide and their important role as habitat and in sequestering carbon.

There are additional mature trees, including large oaks, in the riparian corridor and unbuildable floodplain portions of the project site. Those trees should also be protected because of their habitat, watershed protection, and carbon sequestration values. The delineation by the Environmental Impact Report of the areas subject to flooding should not just reflect historical floods, but should also take into consideration the increased intensity of atmospheric river events expected due to climate change. Care must be taken to avoid new construction and land disturbance that would conflict with such large flood events.

Further, the Creekside Nature Area is a 1.8-acre blue oak riparian forest under the purview of the Fulton–El Camino Recreation and Park District that abuts the site, and is only accessible to the public through the site. We understand the current design plan would eliminate or substantially diminish public access, especially for individuals with disabilities, and would restrict the ability of maintenance and law enforcement vehicles to reach the site. Additionally, we understand the

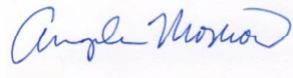
proposed pedestrian access is very close to the lowest part of the floodplain, which could pose public safety issues and subject the trail to flood damage.

Thank you for your consideration of our comments.

Sincerely,



Janet Cobb
Executive Officer
California Wildlife Foundation
jcobb@californiawildlifefoundation.org



Angela Moskow
Manager
California Oaks Coalition
amoskow@californiaoaks.org

cc: Emily Ballus, General Manager, Fulton–El Camino Recreation and Park
District, eballus@fecrpd.com

Dylan Wood, Environmental Scientist, California Department of Fish and Wildlife,
dylan.wood@wildlife.ca.gov

Homegrown Habitat Plant List 2019

	A	B	C	D	E	F	G	H
	Bloom	Common Name	Scientific Name	Life Cycle	Height	WUCOL	Sun	Notes
1	Early	Western Redbud	Cercis occidentalis	P	10'-20'	L	S/PS	Drought-tolerant; also tolerates semi-riparian conditions
2		Red Willow	Salix laevigata	P	30'-50'	H	FS	Wetland-semi riparian; tolerates clay soils; fast grower, semi-deciduous
3		Arroyo Willow	Salix lasiolepis	P	7'-35'	H	FS	Likes marshes/wet areas; spreads by root runners; deciduous
4		Sandbar Willow	Salix exigua	P	10'-23'	H	FS	Constant moisture; spreads by basal shoots to any moisture
5		Valley Oak	Quercus lobata	P	60'-100'	L	FS	Fast growing (20' in 5 years); drought tolerant
6		Scrub Oak	Quercus berberidifolia	P	15'-20'	L	FS/PS	Smaller, drought tolerant, likes medium fast drainage
7		Buck Brush	Ceanothus cuneatus	P	5'-12'	VL	FS	Needs fast drainage; fast to moderate growth, evergreen
8		California Everlasting	Psuedognaphalium californicum	P	3'	VL/L	FS	Semi deciduous, may like some afternoon shade in summer
9		California Blackberry	Rubus ursinus	P	6'	M/H	FS/PS/S	Requires substantial moisture, wide spreading
10		Dutchmans Pipe	Aristolochia californica	P	20'	L/M	S/PS	Deciduous vine, grows in moist woods along streams
11		Baby Blue Eyes	Nemophila menziesii	A	.25'	L	FS/PS	Annual herb
12		Chinese Houses	Collinsia heterophylla	A	.5'	M	S/PS	Annual purple flowering herb, good in containers
13		Lacy Phacelia	Phacelia tanacetifolia	A	3'	VL/L	FS	Tolerates clay soils; good plant for biological pest control
14		Miners Lettuce	Claytonia perfoliata	A	1.3'	L/M	PS	Edible spreading annual herb; in the valley, does best in part shade
15								
16	Early-Mid	Blue Elderberry	Sambucus nigra var. cerulea	P	20'-30'	M	FS	Easy to grow, fast growing deciduous shrub/tree; host plant for endangered Valley Elderberry Longhorn Beetle
17		Interior Live Oak	Quercus wislizenii	P	15'-50'	VL	S/PS	Medium to large evergreen, moderate grower
18		Blue Oak	Quercus douglasii	P	16'-82'	VL	FS/PS	Slow grower deciduous, supports many species
19		Toyon	Heteromeles arbutifolia	P	12'	L	FS/PS	Evergreen shrub easy to grow, white flowers early summer, red berries in fall
20		Shining Willow	Salix lasiandra	P	3'-30'	M/H	FS/PS	Winter deciduous riparian plant, good for restoration projects
21		Mountain Mahogany	Cercocarpus betuloides	P	8'-20'	VL/L	FS/PS	In the valley this plant will do better with PM shade
22		Hollyleaf Redberry	Rhamnus ilicifolia	P	9'	L	PS	PM shade in the valley, siting is critical for success
23		California Broom/Deerweed	Acmispon glaber	P	3'	VL	FS	Not too showy subshrub with high habitat value
24		Skunkbush, Fragrant Sumac	Rhus aromatica	P	8'	L	FS/PS	Winter deciduous shrub, may like PM shade in valley
25		Chaparral Honeysuckle	Lonicera interrupta (hispidula)	P		VL/L	FS/PS	Hardy, woody chaparral shrub/vine, summer flowering, edible/bitter berries
26		Silver Bush Lupine	Lupinus albifrons	P	3'	L	FS/PS	Requires good drainage, PM shade in valley
27		Foothill Penstemon	Penstemon heterophyllus	P	5'	L	FS/PS	Perennial evergreen herb. May need pm shade in valley
28		Sonoma Sage	Salvia sonomensis	P	1.3'	VL	PS	Moderately drought tolerant if given part shade
29		Purple Needlegrass	Stipa pulchra	P	3'	VL/L	FS	CA state grass, perennial with deep roots
30		California Poppy	Eschscholzia californica	A	.5'	VL/L	FS	CA State flower, tolerates clay soil, readily reseeds
31		Elegant Clarkia	Clarkia unguiculata	A	.5'	L	FS/PS	Showy pink flowers, reseeds readily
32		Globe Gillia	Gillia capitata	A	1'	L/M	FS	Showy pink to lavender flowers
33		Miniature Lupine	Lupinus bicolor	A	1.3'	L	FS	Showy purple and white flowers, plant with CA poppies
34		Sky Lupine	Lupinus nanus	A	2'	L	FS	Chaparral annual herb
35								

Homegrown Habitat Plant List 2019

	A	B	C	D	E	F	G	H
	Bloom	Common Name	Scientific Name	Life Cycle	Height	WUCOL	Sun	Notes
36	Mid	California Buckwheat	Eriogonum fasciculatum	P	2.5'	VL/L	FS	Tough, easy to grow, prefer good drainage
37		Hoary Coffeberry	Frangula californica var tomentosa	P	20'	L	FS/PS	May prefer PM shade in valley
38		California Wildrose	Rosa californica	P	8'	M	FS/PS	Tolerates clay soils; drought-tolerant; spreads through underground runners
39		California Wild Grape	Vitis californica	P	10'-40'	L/M	FS/PS	Common along rivers and streams, winter deciduous
40		Common Yarrow	Achillea millefolium	P	3'	L-H	FS/PS	Looks best with regular water; semi deciduous in drier conditions; can be aggressive
41		Coyote Mint	Monardella villosa	P	2'	L	PS/S	Requires good drainage, needs PM shade in the valley
42		Showy Milkweed	Asclepias speciosa	P	5'	L/M	FS	Tolerates clay soils; spreads through underground rhizomes
43		Imbricate Phacelia	Phacelia imbricata	P	1'	L	FS/PS	Perennial herb; tolerates clay soil; can re-seed
44		Woolly Sunflower	Eriophyllum lanatum	P	2'	L	FS/PS	Summer semi-deciduous; can be extremely drought-tolerant
45		Nude Buckwheat	Eriogonum nudum	P	6'	L	FS	Summer semi-deciduous; leafless stems
46		Blue Wild Rye	Elymus glaucus	P	5'	L	FS/PS	Popular accent grass for gardens; summer semi-deciduous
47		Deergrass	Muhlenbergia rigens	P	5'	L	FS	Attractive bunch grass; easy to grow; grows in most soils
48		Fleabane Daisy	Erigeron foliosus	P	3.3'	L	PS	
49		Lippia	Phyla nodiflora	P	6"	L	FS/PS	Flowering ground cover; spreads rapidly
50		Spider Lupine	Lupinus benthamii	A	2.3'	VL	FS	
51		Seep Monkeyflower	Erythranthe guttata	A	5'	M/H	FS/PS	Aquatic annual plant; good in ponds or rain gardens
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53								
54	Mid-Late	Narrowleaf Milkweed	Asclepias fascicularis	P	1.5'	M	FS	Not showy; tolerates clay; host to Monarchs
55		Virgin's Bower	Clematis ligusticifolia	P	30'	L/M	PS/SH	vine; showy white flowers; summer deciduous; part shade to shade
56		Hooker's Evening Primrose	Oenothera elata	P	5'	M-H	FS/PS	Wetland-riparian but still drought tolerant; reseeds aggressively
57		California Fuchsia	Epilobium canum	P	3'	L	FS	Hummingbird favorite; spreads; cut back in winter
58		Gumplant	Grindelia camporum	P	4'	L	FS	Tolerates most soils; can be cut back in winter
59		Snowberry	Symphoricarpos albus	P	6'	L	PS/SH	Moist shady areas; winter deciduous; spreads by rhizomes
60		Slender Woolly Buckwheat	Eriogonum gracile	A	5'	EL/VL	FS/PS	Small annual; tolerates most soils; winter semi-deciduous
61		Common Madia	Madia elegans	A	7'	L	FS/PS	Annual herb; showy yellow flowers; tolerates many soils
62		Common Sunflower	Helianthus annuus	A	5'	M	FS	Tolerates most soils; can get very large
63								
64	Late	California Aster	Symphyotrichum chilense	P	5'	VL/L	FS/PS	Tolerates clay soil; winter deciduous; cut back in winter; aggressive spreader
65		California Goldenrod	Solidago californica	P	3'	VL/M	FS/PS/S	Easy to grow; for late color plant with Epilobium canum; spreader
66		Sulphur Buckwheat	Eriogonum umbellulatum	P	7'	VL/M	FS	Showy yellow flowers; variable plant; evergreen
67		Bee Plant	Scrophularia californica	P	4'	L	PS	Strong bee attractant; tolerates most soils; needs good drainage
68		Coyote Brush	Baccharis pilularis	P	10'	VL/L	FS/PS	Tough easy to grow shrub; variable forms; blooms into winter
69		Rubber Rubberbrush	Ericameria nauseosa	P	9'	L	FS	Needs good drainage; summer/fall bloom
70		Vinegarweed	Trichostema lanceolatum	A	1'	L	FS	Does not do well in seed mixes; sow individually; tolerates dry clay soils



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
North Central Region
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Rancho Cordova, CA 95670-4599
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GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



July 8, 2022

Nicholas Arps
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608
construction@sanjuan.edu

Subject: Katherine Johnson Middle School Project- Notice of Preparation (NOP)
SCH# 2022060230

Dear Mr. Arps:

The California Department of Fish and Wildlife (CDFW) received and reviewed the Notice of Preparation of an Environmental Impact Report (EIR) from the San Juan Unified School District (SJUSD) for the Katherine Johnson Middle School (Project) in Sacramento County pursuant the California Environmental Quality Act (CEQA) statute and guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish, wildlife, plants and their habitats. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may need to exercise its own regulatory authority under the Fish and Game Code (Fish & G. Code).

CDFW ROLE

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a)). CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (*Id.*, § 1802.). Similarly, for purposes of CEQA, CDFW provides, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

The approximately 9.75-acre project site is situated in unincorporated Sacramento County, east of the Sacramento City limits, in the urbanized Arden-Arcade Community. The project site is located at 2641 Kent Drive, and is bounded by Miramar Road on the south, Belpoint Lane on the west, private residences adjacent to Lacy Lane on the north, and private residences adjacent to Creekside Lane and Cresthaven Drive on the east.

SJUSD is proposing to redevelop a District-owned property in the Arden-Arcade Community, at the former Creekside Elementary School campus and current Creekside Adult Center located at 2641 Kent Drive. All of the existing buildings and facilities associated with the former Creekside Elementary School, which was constructed in 1953, would be demolished and removed. This would involve 25,928 square feet of existing school buildings. A new middle school would be developed in place of the existing facilities.

The Project description should include the whole action as defined in the CEQA Guidelines § 15378 and should include appropriate detailed exhibits disclosing the Project area including temporary impacted areas such as equipment stage area, spoils areas, adjacent infrastructure development, staging areas and access and haul roads if applicable.

As required by § 15126.6 of the CEQA Guidelines, the EIR should include an appropriate range of reasonable and feasible alternatives that would attain most of the basic Project objectives and avoid or minimize significant impacts to resources under CDFW's jurisdiction.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations presented below to assist the SJUSD in adequately identifying and/or mitigating the Project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable CDFW to adequately review and comment on the proposed Project with respect to impacts on biological resources. CDFW recommends that the forthcoming EIR address the following:

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Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable CDFW staff to adequately review and comment on the Project, the EIR should include a complete assessment of the flora and fauna within and adjacent to the Project footprint, with emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats. CDFW recommends the EIR specifically include:

1. An assessment of all habitat types located within the Project footprint, and a map that identifies the location of each habitat type. CDFW recommends that floristic, alliance- and/or association-based mapping and assessment be completed following, *The Manual of California Vegetation*, second edition. Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the Project. CDFW recommends that the California Natural Diversity Database (CNDDDB), as well as previous studies performed in the area, be consulted to assess the potential presence of sensitive species and habitats. A nine United States Geologic Survey (USGS) 7.5-minute quadrangle search is recommended to determine what may occur in the region, larger if the Project area extends past one quad (see *Data Use Guidelines* on the Department webpage www.wildlife.ca.gov/Data/CNDDDB/Maps-and-Data). Please review the webpage for information on how to access the database to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the Project. CDFW recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at: <https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>.

Please note that CDFW's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. CDFW recommends that it be used as a starting point in gathering information about the *potential presence* of species within the general area of the Project site. Other sources for identification of species and habitats near or adjacent to the Project area should include, but may not be limited to, State and federal resource agency lists, California Wildlife Habitat Relationship (CWHR) System, California Native Plant Society (CNPS) Inventory, agency contacts, environmental documents for other projects in the vicinity, academics, and professional or scientific organizations.

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3. A complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within offsite areas with the potential to be affected, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code § § 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. The EIR should include the results of focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable. Species-specific surveys should be conducted in order to ascertain the presence of species with the potential to be directly, indirectly, on or within a reasonable distance of the Project activities. CDFW recommends the SJUSD rely on survey and monitoring protocols and guidelines available at: www.wildlife.ca.gov/Conservation/Survey-Protocols. Alternative survey protocols may be warranted; justification should be provided to substantiate why an alternative protocol is necessary. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Some aspects of the Project may warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought or deluge.
4. A thorough, recent (within the last two years), floristic-based assessment of special-status plants and natural communities, following CDFW's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see www.wildlife.ca.gov/Conservation/Plants).
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]).

Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources

The EIR should provide a thorough discussion of the Project's potential direct, indirect, and cumulative impacts on biological resources. To ensure that Project impacts on biological resources are fully analyzed, the following information should be included in the EIR:

1. The EIR should define the threshold of significance for each impact and describe the criteria used to determine whether the impacts are significant (CEQA Guidelines, § 15064, subd. (f)). The EIR must demonstrate that the significant environmental impacts of the Project were adequately investigated and discussed, and it must permit the significant effects of the Project to be considered in the full environmental context.

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2. A discussion of potential impacts from lighting, noise, human activity, and wildlife-human interactions created by Project activities especially those adjacent to natural areas, exotic and/or invasive species occurrences, and drainages. The EIR should address Project-related changes to drainage patterns and water quality within, upstream, and downstream of the Project site, including: volume, velocity, and frequency of existing and post-Project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-Project fate of runoff from the Project site.
3. A discussion of potential indirect Project impacts on biological resources, including resources in areas adjacent to the Project footprint, such as nearby public lands (e.g., National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Conservation or Recovery Plan, or other conserved lands).
4. A cumulative effects analysis developed as described under CEQA Guidelines section 15130. The EIR should discuss the Project's cumulative impacts to natural resources and determine if that contribution would result in a significant impact. The EIR should include a list of present, past, and probable future projects producing related impacts to biological resources or shall include a summary of the projections contained in an adopted local, regional, or statewide plan, that consider conditions contributing to a cumulative effect. The cumulative analysis shall include impact analysis of vegetation and habitat reductions within the area and their potential cumulative effects. Please include all potential direct and indirect Project-related impacts to riparian areas, wetlands, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and/or special-status species, open space, and adjacent natural habitats in the cumulative effects analysis.

Mitigation Measures for Project Impacts to Biological Resources

The EIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the construction and long-term operation and maintenance of the Project. CDFW also recommends the environmental documentation provide scientifically supported discussion regarding adequate avoidance, minimization, and/or mitigation measures to address the Project's significant impacts upon fish and wildlife and their habitat. For individual projects, mitigation must be roughly proportional to the level of impacts, including cumulative impacts, in accordance with the provisions of CEQA (Guidelines § § 15126.4(a)(4)(B), 15064, 15065, and 16355). In order for mitigation measures to be effective, they must be specific, enforceable, and feasible actions that will improve environmental conditions. When proposing measures to avoid, minimize, or mitigate impacts, CDFW recommends consideration of the following:

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1. *Fully Protected Species*: Several Fully Protected Species (Fish & G. Code § 3511) have the potential to occur within or adjacent to the Project area, including, but not limited to: white-tailed kite (*Elanus leucurus*). Fully protected species may not be taken or possessed at any time. Project activities described in the EIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the Project area. CDFW also recommends the EIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends that the SJUSD include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce indirect impacts to fully protected species.
2. *Species of Special Concern*: Several Species of Special Concern (SSC) have the potential to occur within or adjacent to the Project area, including, but not limited to: western pond turtle (*Actinemys marmorata*). Project activities described in the EIR should be designed to avoid any SSC that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the EIR fully analyze potential adverse impacts to SSC due to habitat modification, loss of foraging habitat, loss of suitable riparian habitat, loss of upland estivation/basking habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends the SJUSD include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce impacts to SSC.
3. *Special Animals*: Several Special Animals have the potential to occur within or adjacent to the Project area, including, but not limited to: yellow-billed magpie (*Pica nuttalli*). Project activities described in the EIR should be designed to avoid any SA that have the potential to be present within or adjacent to the Project area. CDFW also recommends that the EIR fully analyze potential adverse impacts to SA due to habitat modification, loss of foraging habitat, loss of suitable riparian habitat, loss of upland estivation/basking habitat, and/or interruption of migratory and breeding behaviors. CDFW recommends the SJUSD include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce impacts to SA. In particular, the EIR should analyze potential elimination of herbaceous and grassland ground cover which support yellow-billed magpies in the Chicken Ranch Slough corridor.
4. *Sensitive Plant Communities*: CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDB and are included in *The*

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*Manual of California Vegetation*². The EIR should include measures to fully avoid and otherwise protect sensitive plant communities from Project-related direct and indirect impacts.

5. *Native Wildlife Nursery Sites*: CDFW recommends the EIR fully analyze potential adverse impacts to native wildlife nursery sites, including but not limited to bat maternity roosts. Based on review of Project materials, aerial photography, and observation of the site from public roadways, the Project site contains potential nursery site habitat for structure and tree roosting bats and is near potential foraging habitat. Bats are considered non-game mammals and are afforded protection by state law from take and/or harassment, (Fish & G. Code, § 4150; Cal. Code of Regs, § 251.1). CDFW recommends that the EIR fully identify the Project's potential impacts to native wildlife nursery sites, and include appropriate avoidance, minimization and mitigation measures to reduce impacts or mitigate any potential significant impacts to bat nursery sites.
6. *Mitigation*: CDFW considers adverse Project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the EIR should include mitigation measures for adverse Project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of Project impacts. For unavoidable impacts, onsite habitat restoration, enhancement, or permanent protection should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

The EIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset Project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

7. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in the regional ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a

² Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. *A Manual of California Vegetation*, 2nd ed. California Native Plant Society Press, Sacramento, California. <http://vegetation.cnps.org/>

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minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

CDFW recommends that local onsite propagules from the Project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be appropriately timed to ensure the viability of the seeds when planted. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various Project components as appropriate. Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the Project. Examples may include retention of woody material, logs, snags, rocks, and brush piles. Fish and Game Code sections 1002, 1002.5 and 1003 authorize CDFW to issue permits for the take or possession of plants and wildlife for scientific, educational, and propagation purposes. Please see our website for more information on Scientific Collecting Permits at www.wildlife.ca.gov/Licensing/Scientific-Collecting#53949678-regulations-.

8. *Nesting Birds*: Please note that it is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). CDFW implemented the MBTA by adopting the Fish and Game Code section 3513. Fish and Game Code sections 3503, 3503.5 and 3800 provide additional protection to nongame birds, birds of prey, their nests and eggs. Sections 3503, 3503.5, and 3513 of the Fish and Game Code afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by the Fish and Game Code or any regulation made pursuant thereto; section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by the Fish and Game Code or any regulation adopted pursuant thereto; and section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

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Potential habitat for nesting birds and birds of prey is present within the Project area. The Project should disclose all potential activities that may incur a direct or indirect take to nongame nesting birds within the Project footprint and its vicinity. Appropriate avoidance, minimization, and/or mitigation measures to avoid take must be included in the EIR.

CDFW recommends the EIR include specific avoidance and minimization measures to ensure that impacts to nesting birds or their nests do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: Project phasing and timing, monitoring of Project-related noise (where applicable), sound walls, and buffers, where appropriate. The EIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the Project site. In addition to larger, protocol level survey efforts (e.g., Swainson's hawk surveys) and scientific assessments, CDFW recommends a final preconstruction survey be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted earlier.

9. *Moving out of Harm's Way*: The Project is anticipated to result in the clearing of natural habitats that support native species. To avoid direct mortality, the SJUSD should state in the EIR a requirement for a qualified biologist with the proper handling permits, will be retained to be onsite prior to and during all ground- and habitat-disturbing activities. Furthermore, the EIR should describe that the qualified biologist with the proper permits may move out of harm's way special-status species or other wildlife of low or limited mobility that would otherwise be injured or killed from Project-related activities, as needed. The EIR should also describe qualified biologist qualifications and authorities to stop work to prevent direct mortality of special-status species. CDFW recommends fish and wildlife species be allowed to move out of harm's way on their own volition, if possible, and to assist their relocation as a last resort. It should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for habitat loss.
10. *Translocation of Species*: CDFW generally does not support the use of relocation, salvage, and/or transplantation as the sole mitigation for impacts to rare, threatened, or endangered species as these efforts are generally experimental in nature and largely unsuccessful. Therefore, the EIR should describe additional mitigation measures utilizing habitat restoration, conservation, and/or preservation, in addition to avoidance and minimization measures, if it is determined that there may be impacts to rare, threatened, or endangered species.

The EIR should incorporate mitigation performance standards that would ensure that impacts are reduced to a less-than-significant level. Mitigation measures proposed in the EIR should be made a condition of approval of the Project. Please note that obtaining a permit from CDFW by itself with no other mitigation proposal may constitute mitigation deferral. CEQA Guidelines section 15126.4, subdivision (a)(1)(B) states that formulation of mitigation measures should not be deferred until some future time. To avoid deferring

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mitigation in this way, the EIR should describe avoidance, minimization and mitigation measures that would be implemented should the impact occur.

California Endangered Species Act

CDFW is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to the CESA. CDFW recommends that a CESA Incidental Take Permit (ITP) be obtained if the Project has the potential to result in “take” (Fish & G. Code § 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”) of State-listed CESA species, either through construction or over the life of the Project.

State-listed species with the potential to occur in the area include, but are not limited to: Swainson’s hawk (*Buteo swainsoni*)

The EIR should disclose the potential of the Project to take State-listed species and how the impacts will be avoided, minimized, and mitigated. For species such as Swainson’s hawk impact disclosure should be analyzed in two separate components, nesting and foraging, two connected but independent components of the species’ ecology. Please note that mitigation measures that are adequate to reduce impacts to a less-than significant level to meet CEQA requirements may not be enough for the issuance of an ITP. To issue an ITP, CDFW must demonstrate that the impacts of the authorized take will be minimized and fully mitigated (Fish & G. Code §2081 (b)). To facilitate the issuance of an ITP, if applicable, CDFW recommends the EIR include measures to minimize and fully mitigate the impacts to any State-listed species the Project has potential to take. CDFW encourages early consultation with staff to determine appropriate measures to facilitate future permitting processes and to engage with the U.S. Fish and Wildlife Service and/or National Marine Fisheries Service to coordinate specific measures if both State and federally listed species may be present within the Project vicinity.

Native Plant Protection Act

The Native Plant Protection Act (NPPA) (Fish & G. Code §1900 *et seq.*) prohibits the take or possession of State-listed rare and endangered plants, including any part or product thereof, unless authorized by CDFW or in certain limited circumstances. Take of State-listed rare and/or endangered plants due to Project activities may only be permitted through an ITP or other authorization issued by CDFW pursuant to California Code of Regulations, Title 14, section 786.9 subdivision (b).

Lake and Streambed Alteration Program

The EIR should identify all perennial, intermittent, and ephemeral rivers, streams, lakes, other hydrologically connected aquatic features, and any associated biological resources/habitats present within the entire Project footprint (including utilities, access and staging areas). The environmental document should analyze all potential

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temporary, permanent, direct, indirect and/or cumulative impacts to the above-mentioned features and associated biological resources/habitats that may occur because of the Project. If it is determined the Project will result in significant impacts to these resources the EIR shall propose appropriate avoidance, minimization and/or mitigation measures to reduce impacts to a less-than-significant level.

Section 1602 of the Fish and Game Code requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following:

1. Substantially divert or obstruct the natural flow of any river, stream or lake;
2. Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or
3. Deposit debris, waste or other materials where it may pass into any river, stream or lake.

Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

If upon review of an entity's notification, CDFW determines that the Project activities may substantially adversely affect an existing fish or wildlife resource, a Lake and Streambed Alteration (LSA) Agreement will be issued which will include reasonable measures necessary to protect the resource. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if one is necessary, the EIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with CDFW is recommended, since modification of the Project may avoid or reduce impacts to fish and wildlife resources. Notifications for projects involving (1) sand, gravel or rock extraction, (2) timber harvesting operations, or (3) routine maintenance operations must be submitted using paper notification forms. All other LSA Notification types must be submitted online through CDFW's Environmental Permit Information Management System (EPIMS). For more information about EPIMS, please visit <https://wildlife.ca.gov/Conservation/Environmental-Review/EPIMS>. More information about LSA Notifications, paper forms and fees may be found at <https://www.wildlife.ca.gov/Conservation/Environmental-Review/LSA>.

Please note that other agencies may use specific methods and definitions to determine impacts to areas subject to their authorities. These methods and definitions often do not include all needed information for CDFW to determine the extent of fish and wildlife resources affected by activities subject to Notification under Fish and Game Code section 1602. Therefore, CDFW does not recommend relying solely on methods developed specifically for delineating areas subject to other agencies' jurisdiction (such

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as United States Army Corps of Engineers) when mapping lakes, streams, wetlands, floodplains, riparian areas, etc. in preparation for submitting a Notification of an LSA.

CDFW relies on the lead agency environmental document analysis when acting as a responsible agency issuing an LSA Agreement. CDFW recommends lead agencies coordinate with us as early as possible, since potential modification of the proposed Project may avoid or reduce impacts to fish and wildlife resources and expedite the Project approval process.

The following information will be required for the processing of an LSA Notification and CDFW recommends incorporating this information into any forthcoming CEQA document(s) to avoid subsequent documentation and Project delays:

1. Mapping and quantification of lakes, streams, and associated fish and wildlife habitat (e.g., riparian habitat, freshwater wetlands, etc.) that will be temporarily and/or permanently impacted by the Project, including impacts from access and staging areas. Please include an estimate of impact to each habitat type.
2. Discussion of specific avoidance, minimization, and mitigation measures to reduce Project impacts to fish and wildlife resources to a less-than-significant level. Please refer to section 15370 of the CEQA Guidelines.

Based on review of Project materials, aerial photography and observation of the site from public roadways, the Project site supports Chicken Ranch Slough and its associated riparian habitat. CDFW recommends the EIR fully identify the Project's potential impacts to the stream and/or its associated vegetation and wetlands.

CHICKEN RANCH SLOUGH FLOODPLAIN

Exhibit 2 of the Notice of Preparation shows project activities adjacent to or within the floodplain of Chicken Ranch Slough. These floodplain areas support the natural flow of water through Arden-Arcade and connected local habitat. In addition, the Chicken Ranch Slough floodplain represents a viable restoration/enhancement opportunity in which existing riparian habitat could be augmented with additional plantings to increase its value for flood protection and habitat. To avoid impacts to the existing hydrology and habitat value, CDFW recommends SJUSD avoid all development (including fences) within the floodplain of Chicken Ranch Slough.

PUBLIC ACCESS AND COMMUNITY ENGAGEMENT

The existing Creekside Park provides public access trails along Chicken Ranch Slough and access to the Creekside Nature Area, operated by the Fulton-El Camino Recreation and Park District. Both areas represent opportunities for the public to view and enjoy an array of native wildlife species in an urban setting. Informal surveys by CDFW staff in the area have noted more than 25 bird species using the habitat along the trails and in the nature area. As such, maintaining access to these resources is valueable for the

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local community, especially in Arden-Arcade where wildlife and residents have more limited access to open space.

Similarly, existing SJUSD ownership of the site includes large portions of Chicken Ranch Slough and its associated riparian and floodplain corridor. These areas can serve as an important environmental education tool and demonstration area for positive benefits to water quality, drainage, and wildlife. This presents a valuable opportunity not only for any future students but also for connections to the local community. Connecting students and the surrounding community to the slough's resources can support positive environmental stewardship and highlight the importance of the slough.

CDFW recommends the EIR include a community access plan or strategy which preserves existing access to fish and wildlife resources and also seeks ways to enhance the public's connection to the habitat. Partnership with local groups that have expertise in creek restoration or native tree/shrub plantings could be of great value to students and the natural habitat in their community.

CDFW recommends implementation of a bird impact avoidance strategy.

The proposed Project is currently located in habitat known to support migratory and resident nesting birds. Placement of new buildings within suitable nesting bird habitat may adversely affect bird populations by introducing sources of common bird mortalities such reflective windows that birds may collide with. Given declines in segments of the overall bird population³ and ecological benefits of healthy bird activity⁴⁵⁶, CDFW recommends consideration of bird enhancement and mortality reduction strategies in Project design and implementation. Incorporation of these strategies can reduce anthropogenic effects on birds and promote sustainable development in California.

Collisions with clear and reflective sheet glass and plastic is also a leading cause in human-related bird mortalities⁷. Many types of windows, sheet glass, and clear plastics are invisible to birds resulting in casualties or injuries from head trauma after an unexpected collision. Birds may collide with windows as little as one meter away in an

3 Douglas W Tallamy, W Gregory Shriver, Are declines in insects and insectivorous birds related?, Ornithological Applications, Volume 123, Issue 1, 1 February 2021.

4 Maas, B., D. S. Karp, S. Bumrungsri, K. Darras, D. Gonthier, J. C.-C. Huang, C. A. Lindell, J. J. Maine, L. Mestre, N. L. Michel, et al. (2016). Bird and bat predation services in tropical forests and agroforestry landscapes. *Biological Reviews* 91:1081–1101.

5 Wenny, D. G., Ç. H. Şekercioğlu, N. J. Cordeiro, H. S. Rogers, and D. Kelly (2016). Seed dispersal by fruit-eating birds. In *Why Birds Matter: Avian Ecological Function and Ecosystem Services* (Ç. H. Şekercioğlu, D. G. Wenny, and C. J. Whelan, Editors). University of Chicago Press, IL, USA. pp. 107–146.

6 Fujita, M., and K. O. Kameda (2016). Nutrient dynamics and nutrient cycling by birds. In *Why Birds Matter: Avian Ecological Function and Ecosystem Services* (Ç. H. Şekercioğlu, D. G. Wenny, and C. J. Whelan, Editors). University of Chicago Press, IL, USA. pp. 271–297.

7 Klem, D. (2009). *Avian Mortality at Windows: The Second Largest Human Source of Bird Mortality on Earth*. Acopian Center for Ornithology, Department of Biology, Muhlenberg College, Allentown, Pennsylvania.

Katherine Johnson Middle School Project

July 8, 2022

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attempt to reach habitat seen through, or reflected in, clear and tinted panes, so even taking small measures to increase visibility of windows to birds can make a substantial difference in minimizing long-term impacts of urban development near natural environments.

As such, CDFW recommends the Project incorporate bird and wildlife friendly strategies:

- Install screens, window patterns, or new types of glass such as acid-etched, fritted, frosted, ultraviolet patterned, or channel. Additional information can be found at <https://www.fws.gov/birds/bird-enthusiasts/threats-to-birds/collisions/buildings-and-glass.php>.

Incorporation of bird and wildlife strategies not only promotes environmental stewardship but also facilitates compliance with State and federal protections aimed at preserving bird populations.

CDFW recommends consideration of available planting and habitat resources.

CDFW is supportive of public and private landowner efforts to enhance localized habitat value. Utilizing native plants onsite can lead to increased drought tolerance, decreased water use, and decreased maintenance/replacement costs while simultaneously increasing functionality for pollinators and wildlife, increasing the site's biodiversity and ecosystem health, and increasing carbon sequestration and climate change resilience.

CDFW recommends SJUSD consider utilization of the Homegrown Habitat Plant List (Sacramento Valley Chapter, California Native Plant Society) (Attachment 1) when developing landscaping plans. Further resources, including interactive planting guidance can be found at <https://calscape.org/>.

CHEMICAL USE

Rodenticides that control small mammal populations can reduce foraging opportunities for species dependent on small mammal prey, such as red-tailed hawk (*Buteo jamaicensis*). Likewise, rodent prey exposed to chemical rodenticides may inadvertently find its way up the trophic levels, meaning chemicals could be ingested by small mammal foragers such as coyotes (*Canis latrans*). As such, CDFW recommends the project avoid use of chemical rodenticides.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database, which may be used to make subsequent or supplemental environmental determinations (Pub. Resources Code, § 21003, subd. (e)). Accordingly, please report any special-status species and natural communities detected during Project surveys to the CNDDDB. The CNDDDB field survey form can be found at the following link:

Katherine Johnson Middle School Project

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<https://www.wildlife.ca.gov/Data/CNDDDB/Submitting-Data>. The completed form can be submitted online or mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov.

FILING FEES

The Project, as proposed, would have an effect on fish and wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code § 711.4; Pub. Resources Code, § 21089.)

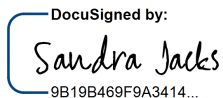
CONCLUSION

Pursuant to Public Resources Code sections 21092 and 21092.2, CDFW requests written notification of proposed actions and pending decisions regarding the Project. Written notifications shall be directed to: California Department of Fish and Wildlife North Central Region, 1701 Nimbus Road, Rancho Cordova, CA 95670.

CDFW appreciates the opportunity to comment on the NOP of the EIR for the Katherine Johnson Middle School Project and recommends that SJUSD address CDFW's comments and concerns in the forthcoming EIR. CDFW personnel are available for consultation regarding biological resources and strategies to minimize impacts.

If you have any questions regarding the comments provided in this letter or wish to schedule a meeting and/or site visit, please contact Dylan Wood, Environmental Scientist at (916) 358-2384 or dylan.wood@wildlife.ca.gov.

Sincerely,

DocuSigned by:

9B19B469F9A3414...

For Jennifer Garcia

Environmental Program Manager

ec: Kevin Thomas, Regional Manager
Jennifer Garcia, Environmental Program Manager
Juan Torres, Senior Environmental Scientist (Supervisory)
Dylan Wood, Environmental Scientist
CEQACommentLetters@wildlife.ca.gov
California Department of Fish and Wildlife

Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@opr.ca.gov.

Central Valley Regional Water Quality Control Board

8 July 2022

Nicholas Arps
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608
constuction@sanjuan.edu

COMMENTS TO REQUEST FOR REVIEW FOR THE NOTICE OF PREPARATION FOR THE DRAFT ENVIRONMENTAL IMPACT REPORT, KATHERINE JOHNSON MIDDLE SCHOOL PROJECT, SCH#2022060230, SACRAMENTO COUNTY

Pursuant to the State Clearinghouse's 10 June 2022 request, the Central Valley Regional Water Quality Control Board (Central Valley Water Board) has reviewed the *Request for Review for the Notice of Preparation for the Draft Environmental Impact Report* for the Katherine Johnson Middle School Project, located in Sacramento County.

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

I. Regulatory Setting

Basin Plan

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

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

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

http://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/

Antidegradation Considerations

All wastewater discharges must comply with the Antidegradation Policy (State Water Board Resolution 68-16) and the Antidegradation Implementation Policy contained in the Basin Plan. The Antidegradation Implementation Policy is available on page 74 at:

https://www.waterboards.ca.gov/centralvalley/water_issues/basin_plans/sacsjr_2018_05.pdf

In part it states:

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

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

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

II. Permitting Requirements

Construction Storm Water General Permit

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

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

Phase I and II Municipal Separate Storm Sewer System (MS4) Permits¹

The Phase I and II MS4 permits require the Permittees reduce pollutants and runoff flows from new development and redevelopment using Best Management Practices (BMPs) to the maximum extent practicable (MEP). MS4 Permittees have their own development standards, also known as Low Impact Development (LID)/post-construction standards that include a hydromodification component. The MS4 permits also require specific design concepts for LID/post-construction BMPs in the early stages of a project during the entitlement and CEQA process and the development plan review process.

For more information on which Phase I MS4 Permit this project applies to, visit the Central Valley Water Board website at:

http://www.waterboards.ca.gov/centralvalley/water_issues/storm_water/municipal_permits/

For more information on the Phase II MS4 permit and who it applies to, visit the State Water Resources Control Board at:

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

Clean Water Act Section 404 Permit

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

Clean Water Act Section 401 Permit – Water Quality Certification

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

¹ Municipal Permits = The Phase I Municipal Separate Storm Water System (MS4) Permit covers medium sized Municipalities (serving between 100,000 and 250,000 people) and large sized municipalities (serving over 250,000 people). The Phase II MS4 provides coverage for small municipalities, including non-traditional Small MS4s, which include military bases, public campuses, prisons and hospitals.

https://www.waterboards.ca.gov/centralvalley/water_issues/water_quality/certification/

Waste Discharge Requirements – Discharges to Waters of the State

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

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

https://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2004/wqo/wqo2004-0004.pdf

Dewatering Permit

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

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

http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2003/wqo/wqo2003-0003.pdf

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

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

Limited Threat General NPDES Permit

If the proposed project includes construction dewatering and it is necessary to discharge the groundwater to waters of the United States, the proposed project will

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

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

NPDES Permit

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

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

Peter Minkel

Peter Minkel
Engineering Geologist

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



July 10, 2022

Mr. Nicholas Arps
Director of Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608

RE: Notice of Preparation of an Environmental Impact Report for the San Juan Unified School District Katherine Johnson Middle School Project

Dear Mr. Arps:

Thank you for providing an opportunity for the Fulton-El Camino Recreation and Park District (FEC) to review and comment on the Notice of Preparation of an Environmental Impact Report for the San Juan Unified School District (SJUSD) Katherine Johnson Middle School Project.

FEC, in our mission and role to "Enhance the quality of life for our community by providing park facilities and recreation programs of exceptional quality while maintaining and protecting our park lands for future generations," and in response to the Potential Environmental Impacts to be Evaluated, offers the following comments in ensuring the impacts of the proposed school site are adequately reviewed, discussed, and mitigated.

Land Use and Planning

The Creekside Nature Area is owned and managed by FEC. The park is located adjacent to the proposed Katherine Johnson Middle School site and is accessed by traversing the nature trail located on the school property. Residents have historically enjoyed all-day access to the Creekside Nature Area by using the nature trail.

The proposed site plan provides for the nature trail to continue to connect Belport Lane on the west side of the project site and Lacy Lane from the north side of the project site to the Creekside Nature Area. The current nature trail from Kent Drive to the park is not included in the site plan for public access.

Creekside Nature Area is situated in a severely disadvantaged community for park access and equity as identified by the California Department of Parks and Recreation (<https://www.parksforcalifornia.org/communities/?address=2641%20Kent%20Drive%20Sacramento%20CA&lat=38.61265000&lng=-121.39430600&overlays=parks>) and is included as one of three Sacramento County environmental justice communities. These reports indicate the neighborhood is under-resourced in access to parks, parklands, and open space.

With limited park land in the area, SJUSD has indicated to FEC that residents will continue to have all-day access to the Creekside Nature Area. While which entrance ways available to the public are still under discussion, FEC encourages SJUSD to explore ways to allow this public access to include the current entrances from the north, south and west neighborhoods to preserve reasonable access for all residents.

Wildland Fire Hazards

SJUSD indicates that as the project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones, the EIR will explain why no significant impacts related to wildland fire hazards would occur.

Creekside Nature Area and the corridor along the Chicken Ranch Slough that borders the school site can present a wildland fire hazard. The natural vegetation and trees located in Creekside Nature Area and along the slough combined with the ongoing drought create a real potential for both natural and human-caused fires in those open space areas.

To mitigate this possibility, FEC requests SJUSD consider widening the existing nature trail to accommodate access for fire and emergency vehicles from Belport Lane and Kent Drive to the Creekside Nature Area. The tentative plan shared with FEC has the construction of a fence along the northern border of the proposed school site that will separate the nature trail from the school site to allow unfettered public access to Creekside Nature Area. Widening the nature trail, as well, can provide a fire and emergency lane to the park.

FEC appreciates our ongoing inclusion in San Juan Unified School's project development discussions and for the opportunity to provide comments.

If you have additional questions or need clarification, please do not hesitate to contact me on 916-927-3802, ext. 118 or via email at eballus@fecrpd.com

Sincerely,

Emily J. Ballus
General Manager

cc: Fulton-El Camino Recreation and Park District Board of Directors



KASSOUNI LAW

July 11, 2022

VIA ELECTRONIC MAIL AND U.S. MAIL

J. Matthew Gerken
Associate Vice President
Urban + Environmental Planning
AECOM
2020 L Street, Suite 400
Sacramento, CA 95811

matthew.gerken@aecom.com

Nicholas Arps
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608

construction@sanjuan.edu

Subject: Response to Notice of Preparation for the Katherine Johnson
Middle School Project

Dear Msrs. Gerken and Arps:

In response to the Notice of Preparation of an Environmental Impact Report (EIR) from the San Juan Unified School District (District) for the Katherine Johnson Middle School (Project) in Sacramento County, pursuant to the California Environmental Quality Act (CEQA) statutes and guidelines, Kassouni Law, on behalf of client William Dunphy, offers the following concerns. The concerns are submitted in an effort to assist the District in identifying and/or mitigating the Project's significant, or potentially significant, impacts based on current understanding. However, they are not meant to serve as an exhaustive list.

1. Student Safety, Traffic, and Related Greenhouse Gas Emissions

It is critical to determine safe student walk routes to campus. Major busy thoroughfares on all sides severely limit safe commutes.

Based on the District's Workshop and Scoping meetings relevant to the Project, the District intends to require students to walk as far as 1.5 miles to get to this site. No bus transportation is planned. However, there are several areas within 1.5 mile school circumference bereft of sidewalks, convenient cross walks, and bike lanes. This is even more critical for students who now reside near the current Katherine Johnson campus, many of whom do not have transportation resources. In years prior, at least one District student has been killed walking to school. To prevent such an event from transpiring again, and to ensure the District frees itself from liability for the same, an extensive study must be completed to ensure safe student arrival and departure within the expected walk routes.

Beyond walk commute concerns, issues of traffic flow arise as well. The Creekside site is bounded by two dead end streets, Kent Drive on the east and Belport Lane on the west. Lacy Lane, also a dead end, connects to the campus by a bridge over the Creek. Belport Lane connects to Elvyra Way, which terminates at Fulton.

The District has proposed extending Miramar through the campus to Belport and adding a parking lot with 90 stalls. This is likely insufficient to provide adequate traffic flow and it is expected that hundreds of cars will block neighborhood streets, leading to lines of stopped cars on the surrounding thoroughfares - El Camino, Fulton and Marconi. It is anticipated that those stopped cars will emit large amounts of greenhouse gases into the air and surrounding neighborhood twice every school day.

Also of concern is emergency service vehicle access to both the school and residents of the neighborhood at student arrival and departure times.

Substantial mitigation measures will be needed

2. Site Planning and Noise Abatement

As currently configured, this middle school of 680 students will be jammed into a suboptimal site. Over half of the existing green field will be paved over and taken up with classrooms and outdoor activity uses. The other half slopes toward the creek drastically limiting its uses as a field. It is a poor choice for a large middle school as it is only about 8.82 acres accounting for flood plain restrictions (based on 100-year flood plan data, not 500-year data) due to its proximity to Chicken Ranch Slough (Creek). This is well below the acreage state statutes suggest for middle schools.

In addition, the noisiest and most intrusive elements of the plan are placed on the eastern boundary next to single family homes at the end of Crest Haven Drive and Miramar Drive. It belies logic why these elements, the multi-purpose room (two story), locker room, outdoor dining and outdoor basketball courts, are placed adjacent to existing homes when they could be located on the west side where they would be separated from residential uses.

Neighborhood residents expect the District to explore all mitigating measures to abate the noise expected to emanate from what currently is a quiet, open field. Dialogue with impacted residents rather than ramming through a final plan is essential.

3. Nature Area Park Proximity

The Creekside Nature Area is located at the northeast corner of the school site across the Creek via a narrow wooden bridge. The nature area consists of approximately two acres of rare Blue Oak trees. It was granted to the Fulton El Camino Park District by the former owner to be used in perpetuity as park for public use. The original grant for recreational uses must be honored regardless of its location.

J. Matthew Gerken, AECOM
Nicholas Arps, SJUSD
July 11, 2022
Page 3

Pursuant to Public Resources Code sections 21092 and 21092.2, Kassouni Law requests written notification of proposed actions and pending decisions regarding the Project. Written notifications shall be directed to:

Timothy Kassouni
Kassouni Law
455 Capitol Mall, Suite 604
Sacramento, CA 95814

If you have any questions regarding the comments provided in this letter or wish to schedule a call, please contact Timothy Kassouni at (916) 930-0030.

Sincerely,



Timothy V. Kassouni

Nicholas Arps, Director of Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608

Submitted via email: construction@sanjuan.edu

RE: Notice of Preparation of an Environmental Impact Report for the Katherine Johnson Middle School, SCH Number 2022060230

Dear Mr. Arps:

We have lived for decades in our home located within 1/3 mile of the Creekside Surplus School Site that was once the Creekside Elementary School. As a result we cherish our neighborhood, its parks and open space, and our creeks (Strong Ranch Slough and Chicken Ranch Slough). We have seen how your district has made a success out of its district-wide K-5 Montessori School while the old Creekside elementary school buildings were, by comparison, allowed to deteriorate. Over the years since the San Juan Unified School District (SJUSD) declared the Creekside site to be a Surplus School Site, the SJUSD has tried to sell the site to developers (there were no takers), has leased the property to private schools, and has re-purposed the buildings and grounds for use as an adult education facility. In the meantime, the public has continued to enjoy the site's open spaces for recreation and access to the outdoors, including the adjacent Creekside Nature Area that is a unit of the Fulton-El Camino Recreation and Park District (FECRPD) facility set.

While we have no problem with SJUSD rehabilitating the old Creekside School or using the property for a valid school district purpose, we are deeply concerned about the SJUSD proposal to create a new middle school campus at Creekside. Therefore, it was good to see that SJUSD intends to prepare an Environmental Impact Report (EIR) for the proposal at Creekside, as there will indeed be significant impacts on the environment if that project is carried out. But before getting into our specific comments about contents of the Notice of Preparation (NOP), we point out some overarching concerns:

- Process – The manner whereby the Creekside site was chosen is highly suspect. SJUSD has told the public that there have been problems stemming from the blending of middle schoolers and high schoolers at the Encina Preparatory High campus. Specific data in support of that problem have been hard to find, however the Assessment Data reports for Encina have consistently shown low academic performance there. What's missing, though, is a distinct policy-making trail from the alleged problem of having middle school grades at Encina to the proposed solution of creating a new middle school campus at Creekside. Apparently, no other locations were evaluated by the SJUSD Trustees and, thus, the Trustees could not have known of the environmental effects of their action to select Creekside as the solution to the Encina problem. This has caught the public unaware and has spurred concern among

Michael and Suzanne Seaman
2837 Merrywood Drive
Arden Arcade, CA 95825

the fairly small segment of the public that has been told about the proposed new campus at Creekside. It would be helpful to have the EIR fill in the details of how the SJUSD Trustees determined – via an open process that involved the public and responded to their concerns - that middle school grades would not be hosted at the 47.41 acres of school district land at the Encina/Greer complex and that no other school district property in the west end of the SJUSD would be used for middle school education other than the existing Arcade Fundamental and Arden Middle campuses, the several existing K-8 campuses in the west end, and a new large campus at the Creekside site. This is particularly important given that the SJUSD Facilities Plan, which SJUSD has said drives the construction of new schools, is silent as to the source and use of some \$60M needed to build the Creekside site and an additional unknown sum needed to relocate the adult education facility from Creekside to Encina.

Another questionable aspect of the process is the way the NOP has been drafted. The text seems to be an Initial Study checklist in paragraph form, identifying this that or the other subject as having little or no consequence. Yet, the site's inherent baggage is obvious, as even a casual reading of the NOP comments posted by the State Clearinghouse show. We expect the SJUSD to do more than just give lip service to the issues raised by people and entities that submit written comments about the NOP and the EIR as well as concerns voiced by the public. Our observations about the proposed project thus far have been that any such concerns are held at arm's length by SJUSD Trustees and staff. We agree with CEQA case law that public input should not be given the brush off. We expect the EIR to take public input seriously.

- Demographics – West Arden Arcade is one of four Environmental Justice Areas (EJAs) in the Environmental Justice Element of the Sacramento County General Plan (adopted 12/2019). As designated, the West Arden Arcade EJA applies to all of unincorporated Arden Arcade west of Watt Avenue. The SJUSD policy decision to re-arrange middle school boundaries at its west end has direct ramifications for students and their families in the West Arden Arcade EJA, which implies that the Environmental Justice Element of the County General Plan is of extreme importance for the Creekside project. To characterize the Creekside campus as a panacea for environmental justice problems would demonstrate blissful ignorance of the intent and direction of the Environmental Justice Element, particularly with respect to factors like the West Arden Arcade EJA's poverty, lack of civic engagement, inadequate and/or unsafe mobility choices, and restricted access to open space and a healthful environment. Such problems will not be resolved until all residents of the community can rise above them. At a minimum, vigilance is called for to ensure the current environmental injustices do not get worse.

- Definition of “project”. The NOP states that “the project” is the “Katherine Johnson Middle School Project”. Katherine Johnson Middle School (KJMS) is located at 1400 Bell Street. There is nothing in the NOP that speaks to the relocation of students from the current KJMS to some other location. Nor does the NOP explain the expanded enrollment of the proposed KJMS campus at Creekside. The CA Department of Education census of KJMS enrollment in the 2021/2022 school year shows 543 students there, only 229 of which are in 6th grade. Those 6th graders would be in the 8th grade by the earliest time the proposed Creekside campus would be open. Will all of them be transferred from Encina to Creekside? Not according to Frank Camarda, SJUSD Operations Chief, whose public presentations have indicated there would be new enrollment boundaries established for the north, middle and south segments of Arden Arcade’s school population. According to Mr. Camarda’s public statements, the projected enrollment at the Creekside campus would be 671, which might be 550-600 more students than would be expected to transfer from KJMS at Encina (based on a guess of about 1/3 of the 229 students). Suffice it to say that the figures are confusing to the public. Adding to the puzzle, the SJUSD has said the expected “bulge” of middle schoolers in the west end is temporary, can be absorbed by the existing high schools, and contrasts with the expected overall decline in enrollment now underway. It would be helpful for the EIR to provide details about how many students are expected to attend the proposed KJMS at Creekside and identify the neighborhoods from which those students would be derived, address the temporary nature of the expected middle school “bulge” and explain how the need for 3 middle school campuses within 3 miles (one re-boundaried and 1 brand new) are justified in the face of a declining school population.

In addition, since the NOP says the current adult school at Creekside will be relocated to Encina, the EIR should provide sufficient information about impacts from that component of the project as well as describing the Creekside factors. If the 300 adult school students from the current Creekside adult school population of 300-500 (NOP data) are to be transferred to Encina, where will the other 200 students be sent and what are the environmental implications of shifting those students?

- Not fair to kids. Rosy expectations lie at the heart of the argument for the Creekside campus. It has been said that children deserve a nice school they can be proud of, especially disadvantaged children. But any way the site is sugar-coated cannot escape the simple fact that the site is too small for the proposed kind of large middle school. Because of the site’s flood risks, the buildable acreage is considerably smaller than what the state expects. The location at 3 dead-end streets requires a through road. Recent SJUSD construction projects in the local area involve large parking lots that ultimately reduce existing green space. District staff had told the public that the

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campus plan is fixed, the building footprints will not be changed and 2-story buildings will not be considered. The SJUSD Facilities Committee was told the site barely exceeds 70% of the state's cut-off for an undersized middle school campus of this magnitude. SJUSD staff have hinted that the state can grant an exception. It is a mystery why it is OK for disadvantaged students to get a minimum-sized campus or a less-than-minimum sized campus they are supposed to be proud of when students in SJUSD's privileged neighborhoods have more spacious facilities. Further, putting a low-performance student body into a new building is no guarantee of remarkably-improved performance. Lower class size, a much better ratio of teachers to students, and a wide diversity of academic and physical education experiences are probably in order. All those factors speak to a need for more space, not less; for maximums, not minimums.

Having stated those overarching matters, we turn to the NOP's list of potential environmental impacts. As indicated above, we are not opposed to SJUS using the site for school district purposes, but we do object to the scale of development and rush to judgement inherent in the proposed project to date. The California Environmental Quality Act is merely a device whereby decision-makers (in this case, the SJUSD Trustees) can become informed of the environmental consequences of their actions. We expect the EIR to treat each aspect with sincerity, to delve into the concerns raised with an approach that demonstrates a genuine search for answers and mitigation. And we expect the SJUSD Trustees to respond according to their adopted strategy of respecting the entire community they serve in that they "commit to hearing all voices, acknowledging, validating, and responding as we continuously grow together as a community" (SJUSD Strategic Plan Shared Value #3).

Rather than detail points other commenters may have raised or can be expected to raise for each of the various factors laid out in the NOP, we submit some highlights that matter sincerely to us and, we imagine, can add value and clarity to similar concerns raised by others.

AESTHETICS, LIGHT AND GLARE. The Creekside site is smack in the middle of a large, densely-populated, major urban area. The fact that the site has a lot of open space and is adjacent to Chicken Ranch Slough and the Nature Area has tended to buffer the surrounding residences from the, frankly, largely unpleasant urban mass that surrounds the site. Maximum development of the site will only take away from the relief the site currently offers to nearby residents. So, while we understand that schools have to be lit during certain periods of darkness, we assert that backlight, up light and glare (BUG) standards are of paramount importance. Lighting design for the new campus should not only involve BUG-appropriate luminaires, but should also consider circadian lighting aspects (color spectrum), intensity (dimming), security lighting based on motion sensing technology, and dark sky solutions. Those factors can help to diminish the intrusiveness of the campus' lighting on adjacent residences, flora and fauna. This topic area is also related to the energy topic area.

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AGRICULTURAL AND FORESTRY RESOURCES. The NOP states that it will say no forest lands are present. Such a statement reflects a misguided attitude towards forests – as though trees only have value for lumber. Yet for decades the US Forest Service has promoted the policy stance that forest lands have many uses beyond just timber harvesting. What matters at Creekside is urban forestry. There are significant trees at Creekside and its neighboring Nature Area. Those trees provide important reductions in the heat island effect, sequester carbon, and provide habitat for animals, including sensitive species. The current trend in state policy is for more and better trees – not less of them - in urban areas, particularly urban areas that can be of service to residents of disadvantaged areas like West Arden Arcade. The role of trees as a climate change strategy cannot be overlooked; the state even has an oak tree initiative that speaks directly to the ability of oak trees for carbon sequestration.

The site might not be “zoned or designed for agricultural” purposes, but it is used that way. There is a community garden at the current adult school, one that seems to be important to local residents, many of whom are recent immigrants and refugees. And, frankly, that’s consistent with modern trends away from Big Ag and corporate farming. If you want fresh produce, grow it yourself. Children and their families can learn that food is not grown in the back rooms of supermarkets. That’s consistent with SJUSD’s Strategic Plan commitment #2 to “Real World Knowledge”, so why get rid of it?

AIR QUALITY. We all know our local air quality is awful. There will be plenty of days when students will not be going outdoors at Creekside thanks to air quality levels rated hazardous for children’s lungs or athletics conducive to mouth-breathing. There will surely be days, even weeks, when California is on fire and smoke hangs heavy over our community. If the site was bigger, it could have more room for indoor athletic activity – a gym with a mezzanine running track for example. The likelihood of several days with bad air quality argue for a site plan that has not been preselected to be a set of buildings that require going outdoors when traveling between class rooms. Air quality events are less problematic if a two-story building footprint is used, one conducive to moving between class rooms without going outdoors. This topic area is directly related to the energy and air quality topic areas.

BIOLOGICAL RESOURCES. We have seen the extensive letter sent by the CA Department of Fish and Wildlife in response to the NOP. We have also seen the letter from the CA Wildlife Foundation/California Oaks and the comments of the Sacramento Area Creeks Council. It is obvious that the site is very important to local flora and fauna, including several species of concern. To those letters we note our own direct observations of species of concern such as the Western Pond Turtle, Red-shouldered hawk, Yellow-billed magpie, and our knowledge of the observations of others as to long-eared owls, Swainson’s hawks, Cooper’s hawks, White-tailed kites, Great egrets, and the like. The NOP states that Chicken Ranch Slough “runs through a small portion of the project site’s northern boundary.” That’s not true. Chicken Ranch Slough runs along the site’s entire northern and northwestern boundary and provides important riparian habitat immediately downstream of the Slough’s reach that runs through the Creekside

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Nature Area that holds a crucial Blue Oak legacy forest. The riparian habitat of Chicken Ranch Slough in the immediate vicinity of the site is important habitat, not something to be taken lightly.

Sacramento County strongly values our riparian habitat areas. The County's web site says:

"When compared to grasslands and upland forest, riparian areas have the highest species diversity and productivity for both flora and fauna. Over 135 species of California birds such as the willow flycatcher, yellow-billed cuckoo and red-shouldered hawk either completely depend upon riparian habitats or use them preferentially at some stage of their life. Riparian habitat provides food, nesting habitat, cover, and migration corridors. Another 90 species of mammals, reptiles, invertebrates and amphibians such as California red-legged frog, valley elderberry longhorn beetle, riparian brush rabbit, steelhead, Chinook salmon, western pond turtle, Sacramento splittail, giant garter snake, and Swainson's hawk depend on California's riparian habitats. Riparian habitat provides riverbank protection, erosion control and improved water quality. In addition, riparian areas provide numerous recreational and aesthetic values."

It goes on to say, "Only 5% to 10% of California's original (pre-European contact) riparian habitat exists today and much of the remaining habitat is in a degraded condition." And adds:

"Sacramento County has adopted numerous policies in favor of protecting riparian areas. These policies can be found in the 1993 Sacramento County General Plan Conservation Element. County policy CO-62 ensures no net loss of marsh and riparian woodland acreage, values or functions. County policy CO-67 states that parcels shall not be created wherein much of the parcel area would comprise marsh or riparian habitat rendering the parcel unbuildable except when within a floodplain corridor or to be dedicated to and maintained by the County for flood control, drainage, and wetland maintenance."

(source: https://planning.saccounty.net/InterestedCitizens/Pages/ER_Riparian.aspx)

It is abundantly clear that the EIR needs to pay very careful attention to the biological resources and sensitive habitats associated with the site, Chicken Ranch Slough, the unbuildable area of the site subject to flooding, and the adjacent Creekside Nature Area.

CULTURAL AND TRIBAL RESOURCES. We support the concerns and issues presented in response to the NOP by the Native American Heritage Commission.

ENERGY – The NOP is phrased so as to suggest that the EIR will mention energy conservation and move on. There doesn't seem to be any sense of emergency. But the issue is not trivial. In fact, SMUD is currently implementing a policy whereby the region's power supply will be carbon-free by 2030. To achieve that, SMUD relies on partnerships with other public entities.

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That means SJUSD will need to step up with leading edge innovations, rather than being among the last to participate as implied by the NOP. Full-on energy efficiency investments in lighting, HVAC systems and building envelope technology are called for, along with aggressive investments in solar power, battery storage and a complete commitment to electric vehicle support (for SJUSD vehicles and chargers and battery storage for staff, parents, and visitors whether they use electric cars or e-bikes and for students who might use e-bikes and e-scooters) in addition to total support for access by non-motorized vehicles. This topic area is directly related to the air quality and transportation topic areas.

GEOLOGY, SOILS, MINERALS AND PALEONTOLOGY – Our primary concern here is that the soil in the parts of the site subject to flooding should not be disturbed.

GREENHOUSE GAS EMISSIONS – The topic area should be re-focused on all aspects of climate change. It is obviously linked with several other topic areas. Climate change is real and the sense of enormous adverse impacts is growing every day. We can expect intense atmospheric river events, serious challenges to our water supply, longer periods of hotter temperatures, greater and more disastrous wildfires and severe disruptions to our normal expectations for vegetation and other biological resources. The EIR should treat climate change like the serious threat it is.

HAZARDS AND HAZARDOUS MATERIALS – The NOP describes this topic area as just another required topic that can be dismissed with a few canned paragraphs. For example, is the site close to an airport? That's not as big a factor as it was when McClellan AFB was in operation. These days the site is underneath the take off and landing pattern of McClellan Field, which involves occasional flights related to aircraft rework and significant flights connected with Coast Guard and CalFire missions. Especially during fire season, the aircraft flights are particularly disruptive. This topic area is related to the noise and vibration topic area.

HYDROLOGY AND WATER QUALITY – This topic area is presented by the NOP as one that has potential significance. And, indeed, this topic is one of several serious challenges to the project due to the presence of Chicken Ranch Slough. The Chicken Ranch Slough watershed and creek system is addressed by several policies of Sacramento County and is part of the larger State Plan of Flood Control system that is linked with the Central Valley Flood Protection Board and federal flood damage reduction programs administered by the Army Corps of Engineers and other federal entities. The EIR should therefore show how the project will adhere to and address federal, state and county objectives. Long story short, there should be no construction within the flood-risk area associated with the worst-case climate-change scenario. This includes the perimeter fencing the project anticipates for the lowest portion of the flood risk zone (around the elevation vicinity of a 3-5 year recurrence interval flood), as such fencing will act as a debris barrier that can impede the flow of water and direct flood waters into more hazardous circumstances. We are aware of, and support the recommendations of, the Sacramento Area Creeks Council in this regard.

NOISE AND VIBRATION – Interference with routine ambient noise should not be evaluated on the basis of decibels that interfere with hearing health. Instead, the EIR should listen carefully to

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the kinds of concerns raised by nearby residents in the two public meetings that preceded the NOP comment deadline. The normal screaming, shrieking, yelling, etc. of middle school children's outdoor activities can seriously disturb nearby residents' peaceful enjoyment of their homes. Our house is .3 crow-fly miles from a school that is adjacent to a public park and swimming pool. We routinely hear disruptive noises from school groups and public address systems. Thankfully this does not impact us every day, as could very well be the case for residences close to a large middle school. The problem of disruptive school-generated noise should not be treated lightly in the EIR. Nor should the EIR overlook the noise and vibration impacts from low-flying aircraft that will inevitably pass over the site, particularly during California's long fire season.

POPULATION AND HOUSING – The NOP seems oblivious to the existing situation of crowded multi-family residences that exist adjacent to and nearby the Creekside site. The residential load has exploded in recent years as local rents have skyrocketed and with the addition of immigrants and refugees who often have large families. Though the proposed project is unlikely to reduce the demand for housing, it will inevitably conflict with the on-street parking situation that has emerged in the vicinity along with the increased intensity of home occupancy.

Population shifts within the SJUSD have led SJUSD to make changes to its property holdings in the west end by changing schools, leasing property or using west end schools for district-wide purposes. In recent years, the student population has shifted away from the east end and back to the west end. Since the SJUSD is now converting its district-wide Arcade fundamental middle school to a neighborhood-oriented, boundaried middle school, the EIR should present analyses of possible changes to other west-end properties held by SJUSD. The EIR should consider whether other district-wide or special-purpose schools - such as Thomas Edison Language Institute or General Davie school - could be relocated to under-utilized sites away from the west end to make room for the middle school "bulge" in the west end. The EIR should present data about SJUSD's leased property and the potential to reclaim the properties by terminating or not renewing the leases so as to create alternatives to an expensive new school at Creekside. The EIR should also seek alternative ways to use the Creekside site for school functions that do not involve the significant impacts that the proposed large new middle school poses at Creekside. And because taxpayers and school budgets should not be saddled with long-term brick-and-mortar solutions to temporary student population "bulges", the EIR should address the overall decline in student population that works against the presumption of viability for new campuses.

PUBLIC SERVICES – The NOP seems to have included this topic area as just another excuse to dismiss challenges to the proposed project at Creekside. Because the site is in unincorporated Sacramento County, local public services are largely inadequate. For example, the CHP is supposed to provide traffic enforcement – such as reckless driving or speeding – but is spread so thinly across California that it cannot match the traffic enforcement capability of local cities. That means our local streets and roads are not very safe. By significantly altering traffic patterns, the new school will worsen the existing situation. Likewise, municipal services delivered by the county are already stretched too far – our county Supervisor has said in public meetings that the county isn't up to the job. Creating a large new middle school at Creekside will likely burden the county with additional workloads for road maintenance, parking enforcement, code compliance,

homeless encampment surveillance and so on. Since unincorporated communities cannot respond to the demand for services the way cities do, the NOP's focus in this topic area needs to be on the existing and expected inadequacies and costs of services, rather than the creation of new facilities. This topic area is obviously related to several other topic areas.

RECREATION – The NOP proposes to speak about the new campus at Creekside as a driver of increased recreational demand. In reality, though, the real problem with the site is that it threatens to reduce the availability and existing use of the site for recreation. As mentioned above, many residents of the surrounding area are economically disadvantaged. The site is their only open space available for outdoor recreation. The Environmental Justice Element of the County plan clearly shows that there are no traditional parks available within ¼ mile of the residents of the immediate vicinity. The Creekside Nature Area is a specialized recreational facility that gives residents certain opportunities to experience the outdoors, and those functions are most definitely valued by the users. However, for decades the school property has routinely been used for more traditional kinds of urban recreation: playing catch, throwing frisbees, kicking soccer balls, jogging, walking dogs, riding bikes, etc. By locking the public out from the open space at the site, SJUSD will most definitely restrict the largely disadvantaged population of users from access to the site and, unless public access to the Nature Area is guaranteed, the project will deny users of their outdoor recreation experiences there as well. SJUSD has historically enabled the public to use its facilities for outdoor recreation when school is not in session. But more recently, SJUSD's facilities have been locked up to keep the public away at all times, even though the school facilities are not used in the late afternoons and evenings, on weekends and holidays and during long summer recesses. The EIR should address this problem and propose mitigation that will enable the public to continue to enjoy the unfettered access to outdoor recreation that has always been provided by the site.

TRANSPORTATION – This topic area is of extraordinary significance for the project. The EIR should specifically address how the local streets are currently used and how their use will be changed if the large new middle school campus is built at Creekside. Traffic counts alone will not tell the story. Neighborhood streets like Sweet, Elvyra and Belport on the west are already narrow due to street width and parked cars, to the point where only one vehicle at a time can pass through. Parked cars have been clipped by large trucks. Speeding vehicles have threatened pedestrians and even killed neighborhood pets. On the east side, Jonalan, Hampshire and Miramar are residential streets with many driveways. They are not well-suited for the inevitable crush of drop-off or pick-up and event traffic and parking that the school will cause. Further, it is simplistic to think that vehicles leaving the school will be able to easily execute turns from Belport to El Camino or from Elvyra to Fulton. Similarly, traffic on the east side will inevitably experience conflicts with turns from Morse to either Marconi or El Camino.

As for alternative means of mobility, the EIR should understand that there is no viable bus service for the school site. Sacramento RT runs buses with half hour headways on El Camino, Marconi and Fulton that are mostly focused on commuter connections to the light rail system serving downtown Sacramento. Arden Arcade is famous for speeding traffic and lack of sidewalks. The streets in the proposed campus's service area have a few bike routes on major roads and there are no protected bike lanes. The few streets with sidewalks in the proposed

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campus's service have 1950's era narrow sidewalks with rolled curbs and many obstructions like telephone poles and utility boxes. Walking and biking are, frankly, unsafe and unpleasant activities for any of the major access roads. Street crossings are another serious problem. The SJUSD has told the public that students will be expected to walk to and from the proposed project if they live within 1 ½ miles of the school. That means students will be expected to cross major streets like Howe, Bell, Fulton, Watt and El Camino. Safe crossings (stop signs, street lights, etc.) on those thoroughfares are spaced far apart. It is generally too far to walk to and from a safe crossing, meaning students will understandably attempt crossings where there are no stop signs, street lights or protective mid-street islands. We shudder to think of middle schoolers crossing a street like El Camino twice a day during rush hour, a problem that will inevitably be made worse by crossings in darkness (during winter and as a result of daylight-savings vs. standard times).

UTILITIES AND SERVICE SYSTEMS – The NOP talks about the availability of services but doesn't seem to mention the conflicts that provision of those services can cause. For this topic area, the EIR should detail how street congestion is complicated on trash pick-up days and how emergency service vehicles, maintenance vehicles, delivery vehicles and utility vehicles often block traffic on roads needs for access to and egress from the site. Understanding that storm water drainage will be discussed in the hydrology/water quality topic area, we suggest that water supply is not just an issue for this topic area, as it is substantially related to climate change.

WILDLAND FIRE HAZARDS – The NOP's assertion that there will be no wildfire impacts is beyond belief. Just last week there was a wildfire on the school property at the northwestern reach of Chicken Ranch Slough. By sheer good fortune, a neighbor was awake during the early morning hours when the fire broke out and called Metro Fire. Their fire fighters were able to get the blaze under control before too much damage could be done. However, even the slightest differences in observation, temperature, wind and humidity could have set off a major fire. The reality is that California is a tinderbox and urban wildfires are a thing. Had the fire spread it could have destroyed the riparian vegetation in the now-dry creek bed, the bridges, the Nature Area and its priceless oak forest, adjacent residences and utility lines. This topic was the subject of considerable concern at the SJUSD Scoping Meeting on June 30th. Please see to it that the EIR treats the threat of urban wildfire as the serious issue that it is and as an issue that is exacerbated by climate change.

Thank you for your attention to these comments. As you can tell, we are deeply concerned about a number of issues that rise to the level of significance and cry out for mitigation. We have been appalled by the insistence of SJUSD that the die has been cast such that nothing the public says will make a difference. We expect the EIR to comply fully with CEQA rules and regulations, to not be used as a justification document, and to apply genuine, serious mitigation to the current, hastily-developed design. We also expect the "no project" alternative to be given sincere consideration, as it is our preferred alternative.

Michael Seaman and Suzanne Seaman



July 11, 2022

Nicholas Arps
Director of Facilities Construction and Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608

Subject: Notice of Preparation for the Katherine Johnson Middle School project (SAC202203022)

Dear Nicholas Arps:

The Sacramento Metropolitan Air Quality Management District (Sac Metro Air District) thanks the San Juan Unified School District (SJUSD) for the opportunity to comment on the Notice of Preparation (NOP) for the Katherine Johnson Middle School project. SJUSD is proposing to redevelop a SJUSD-owned property in the Arden-Arcade Community, at the former Creekside Elementary School campus and current Creekside Adult Center located at 2641 Kent Drive. All existing buildings and facilities associated with the former Creekside Elementary School would be demolished and removed. A new middle school would be developed in place of the existing facilities. Sac Metro Air District comments follow.

CEQA Review

Please reference Sac Metro Air District's guidance on reviewing projects under CEQA, [The Guide to Air Quality Assessment in Sacramento County \(CEQA Guide\)](#) in preparing the project EIR. The CEQA Guide includes recommended methods of quantifying emissions of pollutants regulated by the Clean Air Act ("criteria pollutants") and greenhouse gases, and thresholds of significance to make CEQA significance determinations about project impacts. The CEQA Guide includes recommended mitigation approaches for emissions that are determined significant according to these thresholds.

School Site Circulation

The NOP should evaluate an alternative where pick-up and drop-off (PU/DO) conflicts between motor vehicles and non-polluting transportation modes such as pedestrian/bicycle/rolling (users of wheelchairs, skateboards, etc.) are minimized, to facilitate and encourage non-polluting transportation. Within the analysis, the following should be considered:

- Develop circulation patterns to reduce pedestrian/bicycle/rolling conflicts with motor vehicles. Consider developing procedures for PU/DOs to be visibly posted as signage to guide traffic flows during school hours.
- Maintain the existing pedestrian entrance located at the northern property line connecting to Lacy Lane. The existing "desire line"¹ visible in satellite images running through the school field from Lacey Lane, suggests that this entrance is well-used. Improving pedestrian access will

¹ Wikipedia. Desire Path. https://en.wikipedia.org/wiki/Desire_path. Accessed 7/11/22.

reduce demand for motor vehicle space along the front of the school, reducing vehicle emissions.

- Install high-visibility sidewalks crossing the intersections of Belport Lane and El Camino Avenue, and Kent Drive and El Camino Avenue. Doing so will create a safer crossing for pedestrians and help reduce conflict with vehicles during PU/DO times.
- Ensure continuous sidewalk improvements along both sides of Kent Drive to the fullest extent feasible. Currently Kent Drive only has continuous sidewalks on the east side. If such improvements are infeasible, consider directing pedestrian traffic to the east side of Kent Drive, via markings including new crosswalks.
- Ensure continuous sidewalk improvements along both sides of Belport Lane to the fullest extent feasible. Currently Belport Lane only has continuous sidewalks on the west side. If such improvements are infeasible, consider directing pedestrian traffic to the west side of Belport Lane, via markings including new crosswalks.

These analysis recommendations are especially important because SJUSD eliminated non-mandated home to school transportation service,² leading to increased motor vehicle congestion at the school site.

All-Electric Infrastructure

To improve public health and reduce greenhouse gas emissions, the Sac Metro Air District recommends that new buildings be all-electric with no natural gas connections. This recommendation includes electric stoves, ovens, space heaters, clothes dryers, boilers and water heaters. Operating buildings without burning natural gas provides substantial public health benefits.³

Urban Heat Island Effect

Developed areas in the Sacramento region are 3 to 9 degrees Fahrenheit warmer than their undeveloped surroundings because of the built environment, such as pavements, roofs, and roads, which absorb and retain heat during the day. This phenomenon is known as the urban heat island (UHI).

According to the Capital Region Urban Heat Island Mitigation Project ([UHI Project](#)), the urban heat island effect already presents a serious challenge for our region. Higher air temperatures increase the formation of ozone, a respiratory system irritant. Extreme heat and extended heat waves can lead to health effects such as heat stress, heat stroke, and even heat mortality, especially for the elderly, the young, people working outdoors, people who are unhoused, people who are low income, and those with pre-existing health conditions. The urban heat island results from converting undeveloped land to developed land but can be mitigated using cool roofs, cool pavements, trees and green infrastructure, and other strategies.

² San Juan Unified School District. Transportation FAQ and Information. <https://www.sanjuan.edu/Page/482>. Accessed 7/11/22.

³ Rocky Mountain Institute. Health Effects from Gas Stove Pollution. <https://rmi.org/insight/gas-stoves-pollution-health/>. 2020.

Cool Pavement

- Consistent with UHI Project findings, all new pavements, including the sidewalks, pedestrian paths, play areas, basketball courts and the parking lots should have the highest albedo possible, but no less than 0.25.

More information:

Recommended Cool Pavement Strategies

<http://www.airquality.org/LandUseTransportation/Documents/SMAQMDRecommendedCoolPavementStrategies.pdf>

Urban Heat Island Project webpage

<http://www.airquality.org/businesses/ceqa-land-use-planning/urban-heat-island>

The Capital Region Transportation Sector Urban Heat Island Mitigation Plan:

<https://www.airquality.org/LandUseTransportation/Documents/UHI%20Mitigation%20Plan.pdf>.
See pages 24-31 for a discussion on cool pavement.

Shade Trees

- Consistent with UHI Project findings, the landscaping plan should incorporate new trees to shade new and existing pavements and structures to the extent feasible, especially along sidewalks and other pedestrian travel areas.
- Tree species should be selected from the directory of air-quality supportive trees in the [Shady Eighty guide](#).

More information:

An extensive tree list is available on p.153 of the [UHI Technical Analysis Report](#).

Cool Roofs

- Consistent with UHI Project findings, all new structures will utilize certified 'cool roofs', consistent with the Title 24, Part 6 prescriptive criteria for roofing products for nonresidential buildings, in effect at the time of project build.

More information: The California Energy Commission's Title 24, Part 6⁴, suggests the following criteria for projects pulling permit applications in or after January 1, 2023 in Climate Zone 12: for low sloped roofs, an aged solar reflectance of at least 0.63 and a thermal emittance of 0.75. For steep sloped roofs, a thermal emittance at least 0.25, with a minimum thermal emittance of 0.80.

The Cool Roof Rating Council provides [a product directory of roofs with emittance values](#).

Electric Vehicle (EV) Charging

In September 2020, Governor Gavin Newsom [announced](#) that California will begin phasing out sales of gasoline-light duty cars and light-duty trucks, requiring 100 percent of in-state sales of these vehicles to be zero-emission by 2035.

⁴ California Energy Commission. 2022 Building Energy Efficiency Standards. <https://www.energy.ca.gov/programs-and-topics/programs/building-energy-efficiency-standards/2022-building-energy-efficiency>. Access 7/11/22.

In support of the State of California goal to phase out light duty vehicles:

- The Sac Metro Air District recommends that the project meet Title 24, Part 11⁵ Voluntary Tier 2 EV level, which specifies the number of EV Capable and EV Capable parking stalls with Electric Vehicle Supply Equipment (EVSE). For projects starting in or after January 1, 2023, based on the number of parking stalls shown in the NOP site plan, the project would include 28 EV Capable spaces and 9 spaces with EVSE (chargers) installed.

More information:

Governor Newsom Announces California Will Phase Out Gasoline-Powered Cars & Drastically Reduce Demand for Fossil Fuel in California's Fight Against Climate Change (9/2021)

<https://www.gov.ca.gov/2020/09/23/governor-newsom-announces-california-will-phase-out-gasoline-powered-cars-drastically-reduce-demand-for-fossil-fuel-in-californias-fight-against-climate-change/>

"What Is the Difference Between EV Capable, EV Ready, and EV Installed?" Charged Future

<https://www.chargedfuture.com/ev-capable-ev-ready-and-ev-installed/>

Report Shows California Needs 1.2 Million Electric Vehicle Chargers by 2030

<https://www.energy.ca.gov/news/2021-06/report-shows-california-needs-12-million-electric-vehicle-chargers-2030>

Bicycle Racks and Lockers

Bicycle racks and lockers should be consistent with the Association of Pedestrian and Bicycle Professional's [Essentials of Bike Parking](#) guidance (APBP Guidance). The guidance covers short- and long-term bicycle parking planning, including rack and locker installation and siting. The guidance recommends that bike racks have two points of contact, that lockers be within 50 feet of building entrances and that they are visible from within building entrances.

Rules and Regulations

All projects are subject to Sac Metro Air District rules and regulations in effect at the time of construction and are required to implement our Basic Construction Emission Control Practices (BCECP). Please visit our website to find a list of the [most common rules](#)⁶ that apply during the construction phase of projects and a copy of our [BCECP](#)⁷.

Demolition

Due to the health risks posed by exposure to asbestos, demolition and renovation activities are subject to Sac Metro Air District Rule 902. Sac Metro Air District staff is available to review

⁵ Department of General Services, Building Standards Commission. CalGreen.

<https://www.dgs.ca.gov/BSC/CALGreen>. Accessed 7/11/22.

⁶ Sac Metro Air District. Rules and Regulations Statement.

<https://www.airquality.org/LandUseTransportation/Documents/RulesAttachment10-2020Final.pdf>. October 2020.

⁷ Sac Metro Air District. Basic Construction Emission Control Practices.

<https://www.airquality.org/LandUseTransportation/Documents/Ch3BasicEmissionControlPracticesBMPSFinal7-2019.pdf>. July 2019.

notifications and answer asbestos-related questions by emailing asbestos@airquality.org or calling 279-207-1122.

Conclusion

Thank you again for the opportunity to comment. You may reach me at 279-207-1127 or rdubose@airquality.org if you have questions.

Please send future project routings to projectreview@airquality.org.

Sincerely,

Rachel DuBose

A handwritten signature in black ink that reads "RDuBose". The letters are cursive and fluid, with the first name "Rachel" and last name "DuBose" written in a single continuous script.

Air Quality Planner / Analyst
CEQA and Land Use

cc: Paul Philley, CEQA and Land Use program supervisor, Sac Metro Air District



Sacramento Area Creeks Council PO Box 162774 Sacramento, CA 95816

(916) 454-4544 · E-mail: saccreeks@gmail.com

Websites: www.saccreeks.org & www.creekweek.net

July 8, 2022

Nicholas Arps, Director of Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608
(916) 971-7700
construction@sanjuan.edu

Re: Public Comments on NOP for Draft EIR - Katherine Johnson Middle School SCH# 2022060230

The Sacramento Area Creeks Council seeks to promote public and private care of natural streams. We work for preserving, protecting, restoring and maintaining the natural streams in our urban communities through education, advocacy, financial support and technical expertise. Our goal is to educate the general public on the aesthetic, recreational, educational, and ecological value of our urban creeks. We participate in the decision-making processes that affect the health of area creeks by promoting sound flood control project design, habitat restoration and effective stream bank stabilization methods.

Thank you for the opportunity for our organization to provide comments on the scope and content of the EIR for this project.

Due to the location of the project - adjacent to a local waterway, an open space area and existing neighborhood - it is important that the CEQA document address project impacts and potential measures to mitigate the impacts on these areas. Besides CEQA requirements, the County has policies that should guide the document preparation. Our comments below mention some of those policies as well as resources that would avoid, eliminate, or reduce potentially significant or significant project impacts and provide guidance on feasible alternative projects of lower impact.

Aesthetics, Light and Glare

The NOP states: “The EIR will describe the existing visual conditions and will evaluate the potential impacts on scenic resources and visual character that may result from redevelopment of the project site, as well as impacts related to light and glare. There are no State or locally designated scenic roadways in the project area.” Because new buildings are planned adjacent to existing homes and the Creekside Nature Area, it is important that the EIR consider potential light pollution which affects wildlife and the health of residents. A good resource is <https://www.darksky.org/>

Wildlife impacts to consider and avoid include: Nocturnal animals sleep during the day and are active at night. Light pollution radically alters their nighttime environment by turning night into day. Predators use light to hunt, and prey species use darkness as cover. Glare from artificial lights can also impact wetland habitats that are home to amphibians such as frogs, whose nighttime croaking is part of the breeding ritual. Artificial lights disrupt this nocturnal activity, interfering with reproduction and reducing populations. Many insects are drawn to light, but artificial lights can create a fatal attraction. Declining insect populations negatively impact all species that rely on insects for food or pollination.

- a) Human health impacts include: “Glare from nighttime lighting can create hazards ranging from discomfort to frank disability.” — American Medical Association Council on Science and Public Health (2012)
- b) Safety: Outdoor lighting can decrease safety by making victims and property easier to see. A [Chicago Alley Lighting Project](#) showed a correlation between brightly lit alleyways and increased crime. There is no clear

scientific evidence that increased outdoor lighting deters crimes. It may make us feel safer, but has not been shown to make us safer.

- c) Benefits of dark sky friendly lighting also include less electricity use.
- d) We offer these dark sky friendly lighting resources [Fixture Seal of Approval program](#) and [database of lighting fixtures](#)

Biological Resources

The **NOP** states: *Biological Resources—The EIR will define the biological resources in the project area, identify existing habitats, and evaluate the project's potential effects on wetlands, other sensitive natural communities, and special-status plant and animal species.*

The EIR needs to take into consideration the biological resources of the adjacent Chicken Ranch Slough and Creekside Nature Area as well as the project area to assess potential project impacts to these areas.

1. **Justification includes County General Plan Policy CO-23 - Development approval** shall be subject to a finding regarding its impact on valuable water-supported ecosystems. Address the following:
 - . Address any impacts to adjacent existing stream corridor and associated floodplain managed by Sacramento County and open space area managed by the Fulton-El Camino Recreation and Park District.
 - a. Address impacts from any expanded footprint of the project as well as possible construction impacts that may be projected or foreseen or reasonably predicted that could detrimentally affect the natural stream channel and Creekside Nature Area or its dependent wildlife adjacent to the property.
 - b. Address impacts to possible future protection and restoration of the adjoining open space area.
 - c. Bird species that have been regularly identified using the property of KJMS and/or stream corridor riparian forest include yellow-billed magpie, red shouldered hawk, red-tailed hawk, white-tailed kite, Cooper's hawk, great egret, snowy egret, scrub jay, acorn woodpecker, Nuttall's woodpecker, long-eared owl, and wild turkey. The Western Pond Turtle has been observed in Chicken Ranch Slough. Deer, known to inhabit the nearby Del Paso Country Club, have been observed foraging in the vicinity of Chicken Ranch Slough.
2. **County Policy CO-25.** Support the preservation, restoration, and creation of riparian corridors, wetlands and buffer zones.

The environmental document should clearly describe in diagram and in text how the project will interface with the Creekside Nature Area. This requires that the current access be described and then a description of any changes to the existing access. This would also have flood attenuation and groundwater recharge benefits to the region and downstream neighborhoods.

Hydrology, Hydraulics, Flood Risk, Water Quality

NOP states: *Hydrology and Water Quality—The EIR will evaluate hydrologic and water quality conditions and potential short-term construction-related effects on water quality from stormwater runoff, as well as longer-term effects on stormwater drainage and maintenance effects on water quality. This section will also evaluate potential impacts related to flooding, impacts on groundwater recharge and sustainability, and impacts on surface water hydrology from the addition of impervious surfaces associated with proposed redevelopment. The potential for the project to impede or redirect flood flows will also be evaluated in this section. This section will outline design features, best management practices, and regulatory requirements required to minimize hydrology and water quality effects.*

1. **County Policy CO-30.** Calls out stormwater development/design standards, including hydromodification management and low impact development standards, established pursuant to the NPDES Municipal Permit. Low impact development design and associated landscaping may serve multiple purposes including reduction of water demand, retention of runoff, reduced flooding and enhanced groundwater recharge.
<https://www.beriverfriendly.net/stormwater-quality-design-manual/>

2. Address any impacts the proposed project will have on the local and regional hydrology through surface hardening. Address Low Impact Development (LID) to avoid, reduce or minimize the project's impacts. This is a critically important issue to meet or improve adaptation of the built environment to address climate change impacts as regional rainfall extremes are modeled and predicted to occur over the next 20-50 years.
3. **County General Plan Water Management for Ecosystems (pg 8 Conservation Element):** The beneficial use of water for urban development and agriculture changes patterns of river and stream flow and water quality, which have impacts on valuable water-supported ecosystems, including riparian and stream ecology and the Sacramento River Delta. The EIR should analyze the potential upstream and downstream impacts related to additional runoff from the new project and ways in which LID protocols, including dual use playing fields/detention basin to reduce impacts to the neighborhood from surface flooding and runoff.
4. **County Policy CO-26.** Protect areas susceptible to erosion, natural water bodies, and natural drainage systems. The County Policy prescribes that this area that includes KJMS and adjacent waterways that will be impacted by changing and adding impervious surfaces, will have possibly significant impacts to the community at large living along the Chicken Ranch Slough creek and flood management system. It would be the appropriate time to review and address additional modifications to the KJMS Project footprint of buildings and hardscape to minimize the storm runoff impacts to the water quality and ecosystem functions within this flood zone. Utilizing Low Impact Development (LID) concepts will help to minimize the hydrologic and hydraulic impact to the stream channel as well as natural groundwater aquifer recharge systems (ecosystem services) of the channel. We recommend review of the building and hardscape footprints to consider all opportunities to minimize hardscapes and augment the natural stream floodplain and channel functions for better water quality, supply and flood management outcomes, which also includes Climate Adaptation benefits.
5. The Central Valley Flood Protection Act of 2008 required the CVFPP to meet multiple objectives, including 14 listed Flood management and habitat conservation objectives (**California Water Code Section 9616[a]**). Specifically, it stipulated that the CVFPP provide “a description of structural and nonstructural means for enabling or improving systemwide riverine ecosystem function, including, but not limited to, establishment of riparian habitat and seasonal inundation of available floodplains where feasible.” (Ref. DWR CVFPP Conservation Strategy)
 The objectives of the State Plan of Flood Control developed by CA Dept of Water Resources addresses ecosystem function protections and conservation through identified actions in collaboration and coordination with regional flood and planning agencies such as Sacramento County. The current KJMS Project EIR needs to sufficiently address this larger State Flood Plan objective for improving flood water management in concert with protection of aquatic ecosystems and their associated wildlife and aquatic organisms of significance to the State. The County General Plan Conservation Elements include companion policy guidance that recognizes the objectives of compliance with the State flood system objectives. The Chicken Ranch Slough watershed and creek system is part of the larger State Plan of Flood Control system and therefore should adhere to and address State and County defined objectives.
 A KJMS Project that will impact the historic floodplain may provide the County an opportunity to condition the Project to fund restoration of the creek and riparian flood zone and provide additional community flood protection and ecosystem conservation benefits that would also benefit science teaching programs at the proposed school.
6. **County General Plan Objectives - Manage Water to Protect Ecosystems Implementation Measure A.:** Condition development projects to provide fair share funding of water-supported ecosystems restoration programs where appropriate. (PLANNING & ENVIRONMENTAL REVIEW, DWR) The County General Plan requires fair funding allocations to address any water-supported ecosystems restoration and conservation or expansion programs in collaboration with other County government offices, such as Parks and Recreation, that may manage such properties for community benefits, as well as align with larger flood system conservation purposes identified by State agencies such as DWR (GP Policy ref above). In early April, the County made it clear to the SJUSD project team that there is a floodplain on the project and the school district must design its project accordingly to ensure there are no adverse impacts. Given the present and projected intensity and frequency of atmospheric river events, the EIR should delineate and quantify the size of the site's bankful discharge, 100-year and 500-year flood plain. Further, the County has told the project team to provide a site plan and associated drainage study that can be reviewed for consistency with the County Floodplain Management Ordinance, Improvement Standards, and other various standards. That information should be shared with the public as part of the EIR process along with proposed mitigation measures. This is best addressed early in the planning process to save project proponent time and money. The County should consider conditioning the KJMS Project to fund protection, conservation,

improved land use planning, and restoration of public resources related to the aquatic and riparian ecosystems bordering the Project property as well as funding public safety aspects including wildfire prevention, vegetation management and wildfire suppression and access for emergency medical and law enforcement vehicles. The San Juan Unified School District (SJUSD) as lead agency needs to conduct further evaluations on the design and impacts of the proposed KJMS Project to assess reducing footprint and hardscape impacts to stormwater runoff and flooding into the Chicken Ranch Slough watershed especially under State and federal assessed Climate Change prediction modeling and downscaling for the Sacramento region.

LID strategies should be fully applied in all possible building and hardscape footprint design alternatives, especially and including designs that minimize the overall hardscape footprint of rooftops and hardscape areas. Mitigation for water quality impacts should require all hardscape surfaces to be constructed with watergarten and runoff infiltration swales and galleries to capture as much runoff as possible and hold it for trapping sediment, pollutants, and cleaning/filtering water before infiltration into the ground. There may be other methodologies that could be applied to use natural features that will reduce and treat stormwater runoff and provide protection to water resources and aquatic environments adjacent to the property.

7. **County General Plan Open Space Element: Keeping floodplains undeveloped is likewise an important way to implement flood protection goals in the Safety Element.**

Land Use and Planning and Open Space Protection

NOP states: *Land Use and Planning—The EIR will describe existing land uses and zoning and evaluate the potential for the proposed project to divide an existing community, or to conflict with existing, adopted land use and natural resource plans or regulations that were adopted for the purpose of reducing or avoiding environmental effects.*

County General Plan Open Space Element: Keeping floodplains undeveloped is likewise an important way to implement flood protection goals in the Safety Element. And, preserving open space areas within the fabric of urban development can address Land Use Element policies relating to neighborhood identity and land use conflicts. Indeed, the key role that open space plays in synthesizing land use objectives lends it the distinction as **the only Element where an action plan is specifically required by state law.**

The proposed KJMS Project must fully evaluate the impacts of the development and its footprint to the adjacent public open space that is accessed only across the property of the KJMS Project. This project needs to be fully evaluated for its impacts to and identity of the local adjacent neighborhoods and their identities and needs. Open space in a fully urbanized environment is critical to protect and enhance whenever possible for the public and environmental benefits. The County General Plan Policies identify these issues as priorities for decision making in all development proposals, including schools.

To evaluate the potential conflicts of the KJMS Project with Open Space needs in the local and regional communities (DAC or others) requires further public outreach and engagement to address local neighborhood concerns and requirements. Public safety and community support through Open Space planning is a critical component to any project but especially this one as the direct impacts are foreseeable to existing open space management by the County agencies and should not be skirted for reasons that are outside of public engagement and interests. County and local governments are elected to carry out voter intent and policies and reducing public engagement for “time efficiency sake” of projects is in conflict with elected and board officials in charge of decision making for a community.

The school district has told the public (at its community workshop on June 23, 2022) that the site plan and building design has been set at a single-story concept level to fit with the adjacent neighborhood and that neither the site plan nor the building design will be changed. The EIR needs to address those stipulations, as they appear to 1) conflict with the zoning that applies to the current adjacent single family dwellings, duplexes, apartments and commercial properties in the immediate vicinity and 2) work against mitigation that could be achieved with reduced building footprint(s) associated with a multi-story design concept. Because of recent changes in state law in response to substantial shortages of housing at all price levels (market rate, affordable, low-income and homeless) the EIR should also address the County Housing Element and the upzoning potential for increased housing density in the immediate area.

Cultural and Tribal Cultural Resources

NOP states: *Cultural and Tribal Cultural Resources—The EIR will describe any existing cultural and Tribal Cultural Resources and evaluate potential impacts on those resources, including the potential to affect undiscovered resources during excavation and grading. The EIR will be informed by consultation with California Native American tribes to assess potential impacts on Tribal Cultural Resources*

County Policy CO-32. Support programs and activities conducted by watershed groups and citizen volunteers that help to ensure compliance with the NPDES Municipal Permit by increasing public awareness and encouraging stewardship of water resources.

EIR preparers need to engage and ask for input or review by the local communities, including but not limited to Watershed and Creek Stewardship groups or DAC communities specifically adjacent or impacted by the redevelopment proposal. We request that the KJMS Project leadership conduct a complete and thorough community outreach and communications planning effort to gather community input into the KJMS design parameters. This is required to fully address building and property footprint and design aspects that would more completely address community values and needs.

Greenhouse Gas Emissions and Climate Change

NOP states: *Greenhouse Gas Emissions—The EIR will include a description of the current science surrounding climate change. The EIR will quantify greenhouse gas (GHG) emissions for construction and subsequent operation based on the proposed middle school use. Emissions estimates will be evaluated for consistency with the State legislative framework for reducing GHG emissions reductions.*

County Policy CO-22. Support water management practices that are responsive to the impacts of Global Climate Change. The EIR should suggest playing fields and any other water intensive uses that are part of the project.

Population/Housing/Homelessness/Disadvantaged Communities/Environmental Justice

The NOP states: *Population and Housing—The EIR will evaluate the potential for the proposed redevelopment to induce substantial unplanned population growth. Because the project site has been developed as a school since 1953, no impacts are anticipated related to displacing substantial numbers of housing units or people that could lead to potentially significant physical environmental effects.*

However, the school district made it clear to the public at the June 23, 2022 community meeting that traffic to and from the site was expected to conflict with use of adjacent streets for parking. Since on street parking in the immediate vicinity is associated with multi-family dwellings, a child care facility and an assisted living facility, the EIR should speak to how the adjacent population and housing will be affected by the traffic associated with the project and identify appropriate mitigation measures.

1. County General Plan - Environmental Justice Element - Prioritize “Complete Projects” for EJ Communities. Remodel streets for transit, pedestrian and bicycle use as well as vehicles. There is a lack of focus on prioritizing money to EJ communities for sidewalks and bike facilities.
 - This specific GP EJ planning goal is directly from community outreach feedback for the Arden-Arcade area. Therefore, it is the County’s priority to make sure this action is addressed in all development proposals for the Arden-Arcade Area. This would call for additional public meetings set for the area residents for a time and location that will ensure neighborhood public engagement and participation. This has not been adequately addressed by the SJUSD project proposal to date. Therefore, we recommend extending public comment timeframes to allow for SJUSD to add new times and locations to gather public and neighborhood input to the KJMS Project planning effort.

- The County's EJ goals set a priority to address procedural inequities that lead to lack of participation by residents of EJ Communities in the decision-making process.
 - The SJUSD needs to do further DAC community outreach for planning needed improvements to access for the proposed school so that families and school kids have safe and useful access to and away from the school grounds.
 - This would require the SJUSD to conduct additional community engagement project planning and design meetings to get meaningful input from the neighborhoods surrounding the project and for the area the school would service. This outreach could address both transportation needs and public safety improvements to access the school location. There is a greater need for junior high schools to fully consider and plan for safe walking and bicycling access for kids attending the school. This is especially important for DAC neighborhoods that may have limited access to cars. As well, the plans for transportation need to consider the mix of bus, car, bike and walking access pathways to make sure all routes that kids may take are safe and protected from vehicular traffic. (See Transportation Section)
2. County General Plan - Environmental Justice Element EJ-3. Sacramento County acknowledges the distinction and significance of archaeological resources and tribal cultural resources. Sacramento County recognizes the expertise of both qualified professional archaeologists and California Native American Tribal representatives who may have knowledge regarding tribal cultural resources.
- Native Americans have a long history of living along many waterways of the Sacramento Valley. The KJMS Project EIR needs to conduct a thorough review with tribal representatives that have a history in the region to help identify any culturally significant sites that might be located on or near the project site. If heritage sites of significance are identified, the District, County or State would need to work with the tribal liaisons and representatives to identify appropriate actions to protect or acknowledge the site's significance to Native American history of the area.
- We request that appropriate cultural Native American engagement and surveys be conducted prior to completing any plans for the proposed project site.
- Appropriate mitigation could include but would not be limited to developing historical review reports and information signage that describes the history of local Native American tribal occupation in the region or specifically at this location prior to European-American settlement and development.

Recreation

The NOP states: *Recreation—The EIR will describe existing recreational facilities in the project area, and will evaluate whether the proposed middle school would result in an increased demand for recreation facilities, and whether any increased use of existing neighborhood and regional parks or other recreational facilities would result in substantial physical deterioration of such facilities.*"

1. *Sacramento County General Plan - Open Space Element - Stream and Canal Corridors*: Undeveloped areas along streams and canals that provide a buffer between the water and nearby development and can be used as pedestrian trails and/or wildlife corridors.
2. *SCGP Open Space Element - Natural Resources*: Areas that provide important ecological functions such as wetlands, floodplains, vernal pools, and urban forests. They may also offer educational opportunities for urban residents. This includes areas designated as Natural Preserves on the County's Land Use Diagram.
3. The following land uses are not considered urban open space by the County. This list is not a comprehensive inventory but provides some basis for a better understanding of what is not considered open space by the County.
 - Required elements within a development such as private park and yard areas.
 - Land dedications required for public infrastructure such as strips of land adjacent to roadways, drainage canals or utilities, that do not provide for recreational and/or habitat uses.
4. *Sacramento County Open Space/Rural Principles* - Sacramento County has significant high quality natural/rural areas devoted to agriculture, natural resource protection, and recreational uses. As development continues to occur, it is important to protect these areas as they provide valuable habitat for both humans and wildlife as well

as help retain the rural character of the County that makes it a desirable place to live. To meet this objective, Sacramento County has identified five open space/rural principles that serve as the basis for the Open Space Vision Diagram.

- *Floodplain Protection*: As the County becomes more developed, rainfall runoff will become more of a challenge resulting in increased flooding and expanding 100 year floodplains for area creeks. Limiting the number of development projects within floodplains will provide protection from flooding and help to maintain the integrity of the County's water quality and the regional water supply.
- *Habitat Preservation*: Sacramento County is home to numerous threatened and endangered species and their habitats. Protection of vernal pools, wetlands, creeks, oak woodlands, and other native plant communities throughout Sacramento County will aid in the preservation/recovery of these species. Protecting these areas from encroaching development projects and incompatible uses will aid in the prevention of floods, preservation of endangered species, and provision of open space areas. These areas can also act as greenbelts and enhance residents' overall quality of life by providing a distinct community identity.
- *Greenbelts/Parkways*: Maintaining areas for passive and active recreation contributes to the overall health and well being of County residents. Trails and parkways encourage pedestrian and bicycle travel while providing connectivity between open space areas. Through the incorporation of public use open space within development projects, above state requirements, a valuable sense of place is also created.

5. Parkway Public Access to Open Space Comments

- The KJMS Project property adjoins protected urban open space park land (the Creekside Nature Area) and provides the only public access point to the park area across a de facto public easement path and pedestrian bridge. It is critical to the public enjoyment and accessibility of the park to maintain and enhance this access - including modifications for ADA access - through the KJMS Project site for both public use, site maintenance and even school science education class uses that would be made available to students and researchers across the metropolitan region.
- Potential mitigation could include but is not limited to improving public pathways across the KJMS property to the park area. Improving and augmenting the existing pedestrian bridge to allow for pedestrian and emergency vehicle access for fire-fighting and public safety routes into or out of the park area, ADA access and improved pathway maintenance and development through to the public natural park lands for public enjoyment and use.
- As identified in the GP Open Space Report, development projects are identified as the specific times that the County has the appropriate opportunity to protect and develop new or additional public open space to create "valuable sense of place" and for residents' overall quality of life. As well, the expansion of habitat corridors along the creek channel provides additional values to limited riparian forest habitat and species that require those habitats to survive in urban environments. The County should consider its role and responsibilities under this General Plan Open Space Element to minimize the potential for this KJMS Project to impact existing and new potential open space next to a school and through neighborhoods (DAC specific impacts). Mitigation for new school development should include protection and possible expansion of the existing creek and riparian floodplain habitat and public access improvements.

Transportation

NOP states: *Transportation—The EIR will identify existing conditions, existing plus project conditions, cumulative no project conditions, and cumulative plus project conditions. The EIR will summarize an analysis of vehicle miles traveled (VMT) related impacts of the proposed project, and explain that all adverse physical environmental impacts associated with VMT are included in the air quality, greenhouse gas emissions, and other relevant topic sections of the EIR. The proposed project site plan will be evaluated for access and onsite circulation, including interface with the public roadway network, emergency vehicle access and circulation, and pedestrian and bicycle access and circulation within and adjacent to the site. The EIR will include an evaluation of the project's consistency with the County's multi-modal transportation policies.*

The second goal addresses procedural inequities that lead to lack of participation by residents of EJ Communities in the decision-making process.

Wildland Fire Hazards/Public Safety

NOP states: *Wildland Fire Hazards — The project site is not located in or near state responsibility areas or lands classified as very high fire hazard severity zones. Therefore, the EIR will explain why no significant impacts related to wildland fire hazards would occur.*

We dispute this statement. The site includes vegetation along its northeastern, northern, northwestern and western boundaries that are susceptible to wildfire during the dry season and the site is adjacent to the Creekside Nature Area that has similar wildfire risks. The EIR should address the wildfire risks inherent at the site that can pose potential harm to adjacent lands and buildings.

Alternatives

One of the Alternatives should include LID design, dark sky friendly lighting, and a reduced footprint to lessen impacts on the creek, Creekside Nature Area and neighborhood.

Exhibits

All exhibits showing the proposed project and alternatives should include the existing development footprint and quantify the change in impermeable surface from existing to proposed.

Documentation & References

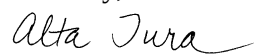
Contact Persons:

Additional Reference Documents and Links:

- Sacramento County General Plan - Conservation Policies
(<https://planning.saccounty.net/LandUseRegulationDocuments/Documents/General-Plan/Conservation%20Element%20-%20Amended%2009-26-17.pdf>)
- California Department of Water Resources Central Valley Flood Protection Plan Conservation Strategy (2021).
https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Flood-Management/Flood-Planning-and-Studies/CVFPP-Conservation-Strategy/Files/2022-CS-Update-and-Appendices/Conservation_Strategy_Update_with-Appendices.pdf
- Sacramento County General Plan - Open Space Element
- <https://planning.saccounty.net/LandUseRegulationDocuments/Documents/General-Plan/Open%20Space%20Element%20-%20Amended%2009-26-17.pdf>
- Sacramento County General Plan - Office of Planning and Environmental Review, Environmental Justice Element
- <https://planning.saccounty.net/PlansandProjectsIn-Progress/Documents/General%20Plan%202030/Environmental%20Justice%20Element.pdf?csf=1&e=1VDeDp>

Any questions regarding the above letter should be directed to me, AltaTura, saccreeks@gmail.com, 916 454-3544.

Sincerely,



Alta Tura
President

cc: FECRPD attn. Emily Ballus

Todd Smith, Planning Director

Planning and Environmental
Review



Dave Defanti, Interim Director

Department of Community
Development

County of Sacramento

July 11, 2022

Nicholas Arps
Director of Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608

**Subject: NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
KATHERINE JOHNSON MIDDLE SCHOOL PROJECT**

Dear Mr. Arps:

Sacramento County appreciates the opportunity to participate in providing comments for Katherine Johnson Middle School Project and the Notice of Preparation. Attached are comments from Sacramento County Department of Transportation and Sacramento County Department of Water Resources.

Sincerely,

Kurtis Steinert
Associate Planner

Attachments

Department of Transportation

Ron E. Vicari, Director



Divisions

Administration
Maintenance & Operations
Engineering & Design

County of Sacramento

July 8, 2022

Nicholas Arps, Director of Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608
construction@sanjuan.edu

Via Email

**SUBJECT: COMMENTS ON THE NOTICE OF PREPARATION OF AN
ENVIRONMENTAL IMPACT REPORT KATHERINE JOHNSON
MIDDLE SCHOOL**

Nicholas Arps:

The Sacramento County Department of Transportation (SacDOT) has reviewed the notice of preparation of an environmental impact report for Katherine Johnson Middle School and appreciates the early outreach efforts by San Juan Unified School District (SJUSD) and their consultant team regarding the traffic study scope and access/circulation review of the preliminary site plans. SacDOT looks forward to continued collaboration with SJUSD to review the traffic study and implement access/circulation improvements, as needed, to accommodate all users, including passenger vehicles, school buses, pedestrians, and bicyclists.

If you have any questions please email me at gasperig@saccounty.net.

Sincerely,

Gary Gasperi, P.E.
Senior Civil Engineer
Department of Transportation

GG/gg

cc: Matthew Darrow, DOT
Cameron Shew, DOT
Kyle Hines, DOT

DEPARTMENT OF WATER RESOURCES

MEMORANDUM

Date: 06/29/2022

To: Kurtis Steinert

From: Mike Durkee

Subject: EIR - Katherine Johnson Middle School in San Juan Unified School District,
Water Resources Comments

- The site has a FEMA AE floodplain and floodway on it but the project area appears to be outside of the AE floodzone.
- The project will need to comply with all applicable improvement standards, stormwater quality requirements, and floodplain management ordinance requirements.

From: [Anna Starkey](#)
To: [Gerken, Matthew](#)
Cc: [Nicholas Arps](#); [Smith, Steven \(Oakland\)](#)
Subject: [EXTERNAL] RE: Katherine Johnson Middle School Environmental Impact Report Notice of Preparation
Date: Thursday, June 23, 2022 10:20:44 AM

Good morning,

On behalf of the United Auburn Indian Community, Tribal Historic Preservation Department, thank you for the NOP for the Katherine Johnson Middle School EIR. We appreciate the opportunity to provide comments.

The Tribal Historic Preservation Department has identified the project area as potentially sensitive due to the historic landscape that shows Chicken Slough in a portion of the project. This increases the chance for buried cultural sites to be present.

We have the following expectations and requests of the Tribal Cultural Resources Chapter of the EIR:

1. We ask that the Cultural Resources and Tribal Cultural Resources (TCRs) chapter and mitigation measures are separate and distinct, and are not combined. This is because tribal values are used to identify, evaluate, and treat TCRs, while archaeological values are used for cultural and historic resources. Separating the chapters also allows the opportunity to discuss Tribes in a contemporary context, especially when consulting under AB 52.
2. If identified in the project area, we ask that the identification, evaluation, and treatment of TCRs be taken into consideration with the same level of analysis and professionalism by Tribes that archaeologists are given. The identification and evaluation of TCRs should be no less rigorous than archaeological resources and can only be accomplished through tribal consultation.

UAIC reiterates that California Native American tribes traditionally and culturally affiliated with a geographic area may have expertise concerning their TCRs (PRC Section 21080.3.1). This means that archaeologists shall not identify, evaluate, or make recommendations for cultural items or sites that are considered TCRs unless it is in direct coordination with consulting Tribes.

The following *resources UAIC identifies as TCRs:

- Indigenous archaeological sites
- Sacred Lands or sites
- Traditional Cultural Properties
- Midden/Anthropogenic soils, including disturbed soils
- Burials, cremations, and all related burial or ceremonial items
- Burial soils

- Isolated indigenous objects, including artifacts
- Cultural landscapes and topographic features
- Indigenous trails
- Significant native plants/gathering areas
- Traditional hunting and fishing areas
- Waterways and associated landscapes

*Not limited to

3. UAIC requests that the TCR chapter and cultural report does not refer to tribes and their ancestors as “prehistoric”. This is a term coined by Euro-American’s that lessens the historic value of tribal people and is considered offensive and inaccurate by UAIC.

Additionally, the cultural resources Ethnographic section is actually “ethnohistory”, unless contemporary Tribal peoples are interviewed by an ethnographer and provide the information for this section. Please label the chapters correctly.

Thank you for involving UAIC in the planning process at an early stage. We ask that you make this letter a part of the project record and we look forward to working with you to ensure that TCRs are protected.

Sincerely,
Anna Starkey

From: Gerken, Matthew <Matthew.Gerken@aecom.com>

Sent: Thursday, June 16, 2022 2:57 PM

Cc: Nicholas Arps <nicholas.arps@sanjuan.edu>; Smith, Steven (Oakland) <Steven.Smith6@aecom.com>

Subject: Katherine Johnson Middle School Environmental Impact Report Notice of Preparation

Greetings,

The San Juan Unified School District will prepare an Environmental Impact Report (EIR) for the proposed relocation of Katherine Johnson Middle School. The District published the Notice of Preparation (NOP) with the State Clearinghouse and Sacramento County Clerk, but we wanted to ensure that *all* interested parties receive this notification, including those parties that would not necessarily receive notice through the State Clearinghouse process. Please see the attached.

If you are interested in providing comments on the scope of analysis, possible mitigation measures, or alternatives we should study in this EIR, please provide such comments before 5pm, July 11, 2022

to:

Nicholas Arps, Director of Facilities Construction & Modernization
San Juan Unified School District
3738 Walnut Avenue
Carmichael, CA 95608
construction@sanjuan.edu

Thank you very much,
Matthew

J. Matthew Gerken

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