

Rio Americano High School Stadium Improvements

Initial Study

Prepared for:
San Juan Unified School District



AECOM

January 2026

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Prepared for:

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ACRONYMS AND OTHER ABBREVIATIONS

AB	Assembly Bill
B.P.	Before Present
BMPs	Best Management Practices
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CalRecycle	California Department of Resources Recycling and Recovery
CARB	California Air Resources Board
CCR	California Code of Regulations
CDE	California Department of Education
CDFW	California Department of Fish and Wildlife
Central Valley RWQCB	Central Valley Regional Water Quality Control Board
CEQA	California Environmental Quality Act
CFR	Code of Federal Regulations
CHRIS	California Historical Resources Information System
CNDDDB	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂ e	carbon dioxide equivalence
CRHR	California Register of Historical Resources
CWA	Clean Water Act
dB	decibels
dBA	A-weighted decibels
District	San Juan Unified School District
DOC	California Department of Conservation
DPM	diesel particulate matter
DPR	Department of Parks and Recreation
DTSC	California Department of Toxic Substances Control
DWR	California Department of Water Resources
EO	Executive Order
EPA	U.S. Environmental Protection Agency
EV	electric vehicle
FICON	Federal Interagency Committee on Noise
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHGs	greenhouse gases
GWP	Global Warming Potential
HVAC	Heating, Ventilation, and Air Conditioning
Hz	hertz
IDA	International Dark-Sky Association
in/sec	inches per second
L _{dn}	Day-Night Noise Level
LDR	Low-Density Residential

LED	light-emitting diode
L_{eq}	Equivalent sound level
$L_{eq}[h]$	1-hour, A-weighted equivalent sound level
L_{max}	Maximum sound level
LOS	level of service
LRAs	Local responsibility areas
McClellan AFB (formerly)	McClellan Airport
mph	miles per hour
MRZ	mineral resource zone
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCIC	North Central Information Center
NO_2	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NO_x	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NRCS	U.S. Natural Resources Conservation Service
NRHP	National Register of Historic Places
O (PC)	Open Space and Parkway Corridor
OES	Office of Emergency Services
PA	public address
PM	particulate matter
PM_{10}	particulate matter with aerodynamic diameter less than 10 microns
$PM_{2.5}$	particulate matter with aerodynamic diameter less than 2.5 microns
PPV	peak particle velocity
RD-4/PC	Low Density Single-Family Residential/Parkway Corridor
RD-4/PQP	Public/Quasi-Public
RMS	root-mean-square
ROG	reactive organic gas
SASD	Sacramento Area Sewer District
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SFNA	Sacramento Federal Nonattainment Area
SHTAC	Swainson's Hawk Nesting Surveys in California's Central Valley
SLF	Sacred Lands Files
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Metropolitan Utility District
SO_2	sulfur dioxide
SRAs	state responsibility areas
SRFCP	Sacramento River Flood Control Plan
SSWD	Sacramento Suburban Water District
SVAB	Sacramento Valley Air Basin
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board's
TAC	toxic air contaminant
THRIS	Tribal Historic Information System

TMDLs	total maximum daily loads
UAIC	United Auburn Indian Community
USD	Unified School District
USFWS	U.S. Fish and Wildlife Service
VdB	vibration decibels
VMT	vehicle miles travelled

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1 PROJECT INFORMATION

Category	Project Information
1. Project Title:	Rio Americano High School Stadium Improvements
2. Lead Agency Name and Address:	San Juan Unified School District, 3738 Walnut Avenue Carmichael, CA 95608
3. Contact Person and Phone Number:	Nicholas Arps, Director of Facilities Construction & Modernization San Juan Unified School District 3738 Walnut Avenue, Carmichael, CA 95608 (916) 971-7700, construction@sanjuan.edu
4. Project Location:	4540 American River Dr, Sacramento, CA 95864
5. Project Sponsor's Name and Address:	San Juan Unified School District
6. General Plan Designation:	LDR (Low-Density Residential)
7. Zoning:	RD-4/PC (Low Density Single-Family Residential/Parkway Corridor)
8. Description of Project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation).	San Juan Unified School District is proposing to improve the existing Raider Stadium within the existing Rio Americano High School Campus, by adding high mast light standards, additional bleacher seating, an upgraded public address (PA) system, and a new press box. New light standards would also be installed along the existing paved fire lane between the stadium and the main campus parking lot, to provide for pedestrian safety.
9. Surrounding Land Uses and Setting:	The project site is surrounded by single-family residential development to the northwest, north, and northeast, and the American River Parkway is adjacent to the project site to the south.
10. Other public agencies whose approval is required: (e.g., permits, financing approval, or participation agreement)	California Department of Education/Division of State Architect

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2 PROJECT DESCRIPTION

2.1 PROJECT LOCATION AND BACKGROUND

The project site is the existing Rio Americano High School campus property, which is situated at 4540 American River Drive (Assessor's Parcel Number 292-0210-019-0000) in the Arden-Arcade area of unincorporated Sacramento County, CA (Exhibit 2-1). Most of the campus would not be affected by the proposed improvements. The focus of improvements would occur in the area of the existing Raider Stadium and associated paved pedestrian access routes and fire lane between the stadium and existing parking areas.

The Rio Americano High School campus comprises 41.52 acres in total land area, with approximately 157,402 square feet of building floor space in 18 buildings and 7 portable classrooms. Outdoor sports facilities include two baseball fields, two softball fields, a soccer field, tennis courts, a swimming pool and diving pool, basketball courts, and the stadium.

Raider Stadium is situated in the southeastern corner of the school campus (Exhibit 2-2). It is an artificial turf field with an eight-lane synthetic track surrounding the field perimeter. The stadium also includes a freestanding scoreboard with a public address (PA) system. Bleacher seating is available at Raider Stadium on the northwest (visitor) side and the southeast (home) side of the stadium; the total existing bleacher seating capacity for Raider Stadium is approximately 288 people. To support evening activities such as athletic practices, eight mobile 11.7-horsepower diesel-powered light-emitting diode (LED) light towers are used during some evening hours, primarily during the week in winter months when sunset occurs in the afternoon.

Rio Americano High School is a public school with a total enrollment of 1,867 students (grades 9 through 12) for the 2024–2025 school year (California Department of Education 2025). The school was originally constructed in 1963. Several additions to the school were made in 1965–1967, and several modernizations were performed in 1996, and in the early 2000s after a fire destroyed the theater and counseling offices. Bleacher seating and small upgrades at the stadium were installed in 2006, and improvements to the stadium were completed in 2019. Due to the lack of adequate sports lighting and due to the current limited capacity, some events, such as home football games and graduation ceremonies, are hosted elsewhere and not on the Rio Americano High School campus.

Single-family residential development surrounds the project site to the east, west, and north. The project site is zoned RD-4/PC (Low Density Single-Family Residential/Parkway Corridor), and the Sacramento County General Plan land use designation is LDR (Low-Density Residential) (Sacramento County 2025). The Arden-Arcade Community Plan land use designation is RD-4/PQP (Public/Quasi-Public) (Sacramento County 2025). Schools are a primary, permitted use in areas that are zoned residential under the Sacramento County Zoning Code (Sacramento County 2025: Table 3.1).

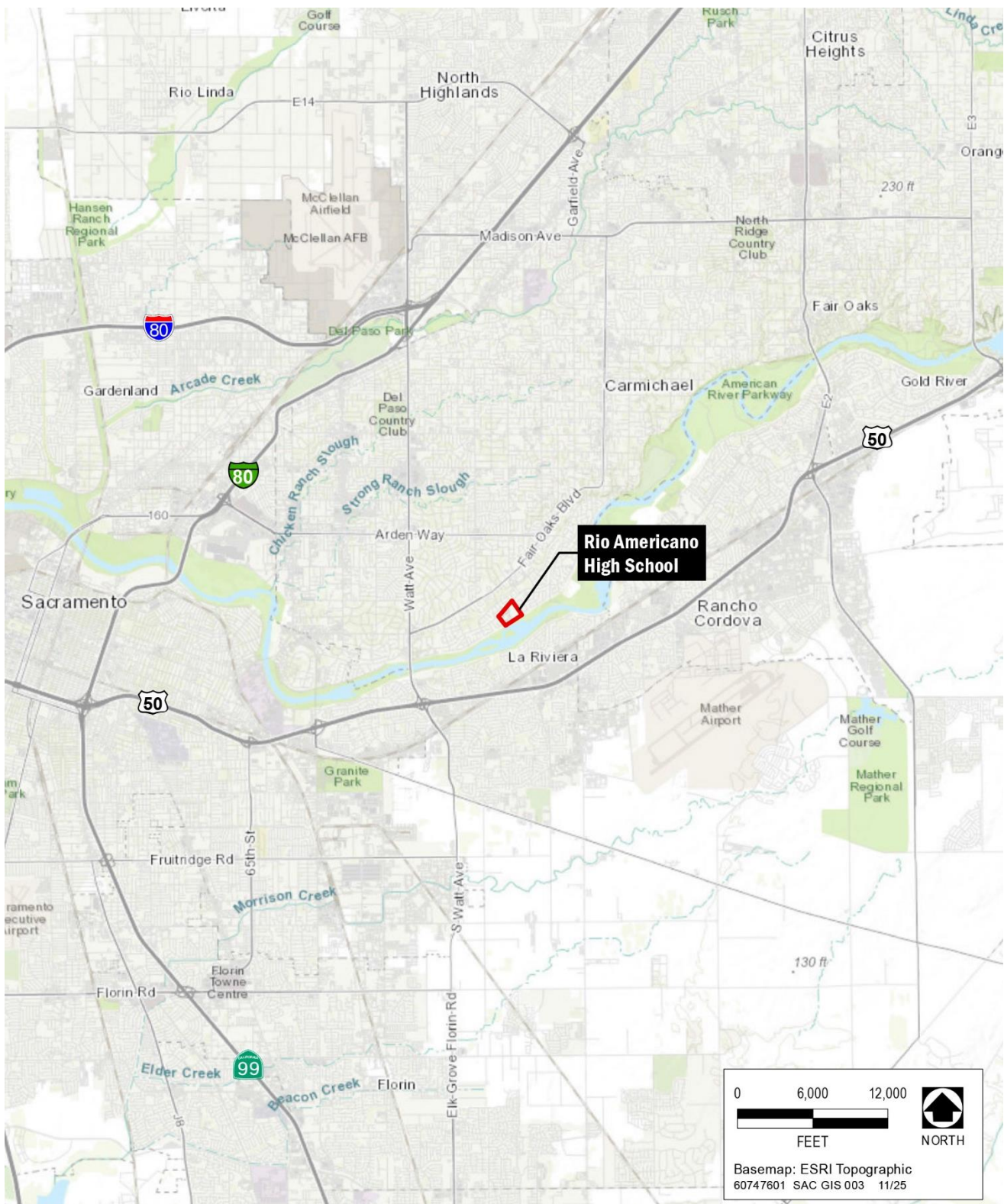


Exhibit 2-1. Regional Project Location



Exhibit 2-2. Project Site

The school campus is separated from the American River Parkway immediately to the south by the elevated U.S. Army Corps of Engineers' flood control levee along the north bank of the American River. The American River Parkway is zoned O (PC) (Open Space and Parkway Corridor) and is operated and maintained by Sacramento County Regional Parks. The overall site topography is flat, with an elevation of approximately 52 feet above mean sea level. In addition to campus facilities, the site also contains existing landscaping consisting of turf grass, trees, and shrubs. In particular, numerous mature deciduous and evergreen trees and shrubs surround the property boundaries of the Rio Americano High School campus, particularly along the southern boundary adjacent to the American River north bank flood control levee and the American River Parkway.

2.2 PROJECT CHARACTERISTICS

2.2.1 PROJECT COMPONENTS

The proposed project consists of improvements at the existing Raider Stadium including the installation of high-mast light standards, additional bleacher seating, an upgraded PA system, and a new press box. New light standards would also be installed along the existing paved fire lane between the stadium and the main campus parking lot to provide for pedestrian safety. Four permanent stadium light poles, ranging from approximately 80 feet tall, would be installed to light the field, replacing the existing use of mobile diesel-powered LED light towers. In addition, six new 15-foot-tall light poles would be installed between the south end of the existing main parking lot (which is accessed at the campus entrance from American River Drive at Saverien Drive) and the stadium, along the paved fire lane, which would serve as the proposed pedestrian travel route, to ensure nighttime visibility for pedestrian safety. New bleacher seating on the north and south sides of the stadium would accommodate a total capacity of approximately 2,500 people. A new press box would also be installed next to the bleacher seating on the south (home) side of the stadium. The proposed project also includes removing the existing metal storage sheds on the northwest side of the stadium, and a small storage shed on the south side of the stadium. Two existing Sacramento Metropolitan Utility District (SMUD) wood light poles within the campus fire lane adjacent to the pedestrian access pathway that would be used for pedestrian ingress and egress between the stadium and parking would no longer be needed after proposed lighting improvements along this pathway are complete and, therefore, would be removed. Finally, the existing PA system would be upgraded. (Additional details will be provided in the Environmental Impact Report, to be prepared after public input has been received on this Initial Study and through the Scoping process.)

The LED light fixtures technology, designed by Musco Lighting as a new state-of-the art, dark sky certified lighting system, would provide the following benefits:

- Utilize a smaller point source, which allows the system to achieve maximum cut-off and light control, significantly reducing light spillage and glare to the surrounding community.
- Operate at adjustable light levels, allowing lighting to be reduced by as much as half the normal intensity, settings that can be utilized during non-competitive events such as practices).

Designed to meet the strict guidelines set by the International Dark-Sky Association (IDA) and, as such, would not contribute to glare or skyglow.

2.2.2 SCHEDULE OF USES

The proposed project would allow several sports teams (including football, flag football, soccer, lacrosse, and track and field), which currently hold practices and games on Saturdays due to a lack of stadium lighting, to schedule practices and games at Raider Stadium in the late afternoon and evening. The timing of all other school-affiliated sporting activities that do not utilize the stadium for practices or games would remain the same as under current conditions. The proposed project would also allow for the school to host whole-school assemblies, graduation ceremonies (which are currently hosted off-campus), and other community events. No uses of the stadium are proposed before sunrise. (The Environmental Impact Report will include a detailed anticipated event lighting schedule, which will provide a summary of the anticipated sports uses of the stadium after the lights are installed.)

The proposed stadium lights would be used on select evenings to accommodate athletic practices and competitions, primarily during the winter months when the sun sets early, and for home football games. It is anticipated that lighting for athletic practices can be provided at a significantly reduced intensity and would not be accompanied by the noise or spectators usually associated with competitions.

Sunset in the Sacramento area ranges from as early as 4:30 P.M. in late November to early December to as late as 9:15 P.M. in early August (National Oceanic and Atmospheric Administration [NOAA] Sunrise/Sunset Calculator for the year 2023). Evening athletic games and evening athletic practices would be limited to only school-sanctioned sports teams. Use of lighting during and following athletic practices would generally end by 9:00 P.M. Most athletic games would end by 9:00 P.M. except for football, which will usually end by or before 10:00 P.M., but no later than 11:00 P.M., with lighting potentially remaining on at reduced levels to facilitate safe crowd exiting and for clean-up and other similar activities after game completion.

2.2.3 ATTENDANCE

The estimated attendance for athletic competitions and other events with implementation of the proposed project would vary by activity and other factors, such as level of competition (regular season versus postseason), the particular visiting team (local teams would be anticipated to draw larger overall crowds), and weather conditions. Under existing conditions, the highest attendance is typically for football games, and this is anticipated to continue in the future. Currently, Rio Americano High School football games take place during Saturday afternoon hours, or off-site at regional high school locations that can accommodate attendance, such as El Camino High School. The proposed project improvements at Raider Stadium may increase attendance for most regular season football games and post-season games, along with other sporting events or playoffs, including track and field, lacrosse, soccer, and flag football, and would also allow for hosting of additional events. (Details regarding the specific estimated numbers of attendees at events accommodated by the proposed project will be provided in the Environmental Impact Report.)

2.3 PROJECT DEMOLITION, CONSTRUCTION, AND STAGING

Access to the project site for construction would be through the fire access lane to the west of the stadium from the main entrance at American River Drive and Saverien Drive. Equipment and materials would be staged adjacent to the stadium within school property.

The existing metal sheds to the northwest of the stadium and the small storage building to the southeast of the stadium would be demolished and removed. The construction contractor would be responsible for recycling the building debris at an appropriately permitted off-site facility, as appropriate. SMUD would be responsible for removing its two existing wood poles that are in the campus fire lane southwest of the stadium.

Installation of the new stadium light poles would involve auguring approximately 3-foot diameter holes to approximately 16 feet below the ground surface, and installing precast pole bases into those holes. The light poles would be raised by a crane bolted to the pole bases. Light fixtures would be attached to the new poles on the ground in the staging area and erected with the poles. Underground electrical conduit is existing with pull boxes near the proposed pole locations; minor trenching would be required to install conduit and wire from the pull boxes to the poles. Similarly, the 15-foot-tall pedestrian egress lighting along the existing fire lane would involve trenching the existing pavement, auguring holes and installing concrete pole bases into the holes, and filling and repaving along the pathway.

The metal bleacher seating would be installed in sections and would be anchored through the existing concrete on the northwest and southeast sides of the stadium. Where proposed bleachers would extend past the existing hardscape, site clearing, grading, foundation construction and paving would occur to provide a base for the bleachers. The press box would be built at the top of the south (home) side bleachers, requiring placement of a prefabricated press box using a small crane, and installation of electrical, data, and Heating, Ventilation, and Air Conditioning (HVAC) equipment. Construction activities for the press box would use hand tools, lifts, and light equipment, with no additional ground disturbance required. Upgrades to the PA system would involve removal of existing components, installation of new wiring and conduit, mounting of new speakers on stadium structures, and installation of updated audio equipment within the press box. These activities involve minor electrical and low-voltage work and limited use of lifts or small tools, with no major structural construction required. Equipment required for construction is assumed at this time to include a crane, auger, backhoe, and forklift. The number of construction crew on site is estimated to be 10. Construction hours are estimated to be between 7 am and 4 pm during weekdays. Construction of the light standards would take approximately one week, while construction of the bleacher seating is expected to require approximately 9 to 12 weeks. The total duration of construction activities is estimated to be 3 to 4 months. Construction activities would occur during the summer months when classes are not in session, and is anticipated to begin in June of 2027.

Total ground disturbance is estimated to be approximately 2,900 square feet of trenching along the pedestrian access pathway, and approximately 5,200 square feet of hardscape and 8,500 square feet of unpaved disturbance areas adjacent to the existing track for the installation of bleachers and lighting at the stadium. No tree removal would be required for demolition or construction of any project components.

2.4 PROJECT OBJECTIVES

As required by the California Environmental Quality Act (CEQA) Guidelines Section 15124(b), the basic project objectives are as follows:

- ▶ Enhance the Rio Americano High School campus as a Center of Community;
- ▶ Provide a facility that is well suited and has the capacity for athletic and non-athletic events, including all-school assemblies, graduation, and other special and regular events;

- ▶ Expand the capability of Rio Americano High School to host athletic and non-athletic events and conduct outdoor student activities during cooler parts of the day;
- ▶ Enhance the high school athletic experience for students, parents, alumni, and the Rio Americano High School community;
- ▶ Increase flexibility for scheduling on-campus outdoor activities over the course of the day and evening; and
- ▶ Optimize scheduling opportunities for athletic practices and competitions outside of normal classroom instruction times of the day.

2.5 INTENDED USE OF THE INITIAL STUDY AND EIR

The San Juan Unified School District Board of Education will consider the information contained in this Initial Study and the EIR as a part of the evaluation of the project. Responsible and other agencies may also use the Initial Study and the EIR for their own discretionary approvals associated with the project.

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 that may be needed for construction and operation of the proposed project include, but are not necessarily limited to:

- ▶ California Department of Education/Division of State Architect – final site and design approval (per California Education Code Section 17213).

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3 ENVIRONMENTAL CHECKLIST

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a “Potentially Significant Impact” as indicated by the checklist on the following pages.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

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

DETERMINATION (To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project could not have a significant effect on the environment, and a negative declaration will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A mitigated negative declaration will be prepared.
- ☒ I find that the proposed project may have a significant effect on the environment, and an environmental impact report is required.
- ☐ I find that the proposed project may have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An environmental impact report is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or negative declaration pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or negative declaration, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature

Date

Printed Name

Title

EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an EIR is required.
4. “Negative Declaration: Less Than Significant With Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less Than Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).
5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance.

3.1 AESTHETICS

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

3.1.1 ANALYSIS

a) Have a substantial adverse effect on a scenic vista?

Impact to be determined. This issue will be evaluated in detail in the Environmental Impact Report.

b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

No Impact. There are no State or locally-designated or eligible scenic highways within the project viewshed (California Department of Transportation 2025, Sacramento County 2022). Thus, there would be **no impact**.

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

Impact to be determined. This issue will be evaluated in detail in the Environmental Impact Report.

d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Impact to be determined. This issue will be evaluated in detail in the Environmental Impact Report.

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3.2 AGRICULTURE & FORESTRY RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
II. Agriculture and Forestry Resources.				
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997, as updated) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. In determining whether impacts to forest resources, including timberland, are significant environmental effects, lead agencies may refer to information compiled by the California Department of Forestry and Fire Protection regarding the state's inventory of forest land, including the Forest and Range Assessment Project and the Forest Legacy Assessment project; and forest carbon measurement methodology provided in Forest Protocols adopted by the California Air Resources Board.				
Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forest land or conversion of forest land to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?	☐	☐	☐	☒

3.2.1 ANALYSIS

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The project site is classified by the California Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) as "Urban and Built-Up Land" (California Department of Conservation [DOC] 2020). Thus, the project site does not include Prime Farmland, Unique Farmland, or Farmland of Statewide Importance. Therefore, Important Farmland (as defined under CEQA) would not be converted to a non-agricultural use, and there would be **no impact**.

b) Conflict with existing zoning for agricultural use or a Williamson Act contract?

No Impact. The project site was developed as a school in 1963 and is zoned RD-4/PC (Low Density Single-Family Residential/Parkway Corridor). Schools are a primary, permitted use in areas that are zoned residential under the Sacramento County Zoning Code. The project site is not enrolled under a Williamson Act contract (Sacramento County 2024). Thus, there would be no conflict with existing agricultural zoning or a Williamson Act contract, and there would be **no impact**.

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The project site is developed with urban land uses consisting of school buildings, paved parking areas and drive aisles, outdoor turf sports fields, and Raider Stadium. A few urban street trees are present around the perimeter of the site. The project site does not include forest land, timberland, or timberland zoned Timberland Production. Thus, there would be **no impact**.

d) Result in the loss of forest land or conversion of forest land to non-forest use?

No Impact. As described in criterion (c) above, the project site does not contain forest land. The proposed project would be situated entirely within the existing developed Rio Americano High School campus. Therefore, the proposed project would not result in the loss of forest land or conversion of forest land to a non-forest use, and there would be **no impact**.

e) Involve other changes in the existing environment, which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to non-forest use?

No Impact. The project site was developed as a school in 1963. Surrounding land uses to the northwest, north, and northeast consist of single-family residential development, which is classified under the FMMP as “Urban and Built-Up Land” (DOC 2020). The north bank American River flood control levee is immediately adjacent to the project site to the south, and the American River Parkway is immediately south of the levee. The American River Parkway is a County regional park. The levee and the Parkway are classified under the FMMP as “Other Land” (DOC 2020). Furthermore, the proposed project would be situated entirely within the existing developed Rio Americano High School campus. Therefore, the proposed minor upgrades to the existing Raider Stadium would not result in conversion of Important Farmland (as defined under CEQA) to non-agricultural use or conversion of forest land to a non-forest use, and there would be **no impact**.

3.3 AIR QUALITY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
III. Air Quality.				
Where available, the significance criteria established by the applicable air quality management district or air pollution control district may be relied upon to make the following determinations.				
Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☒	☐	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☒	☐	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

3.3.1 DISCUSSION

a) Conflict with or obstruct implementation of the applicable air quality plan?

Air quality plans describe air pollution control strategies to be implemented to bring an area that does not attain the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS) into compliance with those standards, or to maintain existing compliance with those standards, pursuant to the requirements of the federal Clean Air Act (CAA) and California Clean Air Act, respectively. The Sacramento Metropolitan Air Quality District (SMAQMD) region, including Sacramento County, is currently designated as nonattainment for the NAAQS and CAAQS for ozone, and nonattainment for the NAAQS for 24-hour particulate matter with aerodynamic diameter less than 2.5 microns (PM_{2.5}), and the CAAQS for particulate matter with aerodynamic diameter less than 10 microns (PM₁₀).

SMAQMD has adopted air quality plans pursuant to U.S. Environmental Protection Agency (EPA) and California Air Resources Board (CARB) regulatory requirements the attainment and maintenance of the NAAQS and CAAQS. The goal of the air quality plans is to reduce criteria air pollutant emissions for which the Sacramento Valley Air Basin (SVAB) is designated as nonattainment in order to achieve NAAQS and CAAQS by the earliest practicable date. For ozone nonattainment, the regional air quality management plan was developed to describe and demonstrate how the Sacramento Federal Nonattainment Area (SFNA) is meeting requirements under the federal CAA in demonstrating reasonable further progress and attainment of the NAAQS for ozone (SMAQMD 2017). For particulate matter, SMAQMD developed the PM_{2.5} Maintenance Plan and Redesignation Request (SMAQMD 2013) to address how the region attained and would continue to attain the 24-hour PM_{2.5} standard and the PM₁₀ Implementation/Maintenance Plan and Redesignation Request for Sacramento County (SMAQMD 2010).

As documented in the SMAQMD CEQA Guide (SMAQMD 2021), the recommended construction and operational mass emissions thresholds for ozone precursors correlate to the nitrogen oxide (NO_x) and reactive organic gas (ROG) reductions from heavy-duty vehicles and land use project emission reduction requirements committed to in the Ozone Attainment Plan for the Sacramento Federal Ozone Nonattainment Area; therefore, projects whose emissions would be less than the recommended thresholds of significance for criteria air pollutants would not conflict with or obstruct implementation of applicable air quality plans related to the attainment of ozone. Similarly, the construction and operational mass emissions thresholds for particulate matter (PM) correlate to the SMAQMD's permitting offset trigger levels, which prevents deterioration of ambient air quality and ensures projects do not worsen the region's attainment status (SMAQMD 2015). Therefore, projects whose emissions do not exceed the recommended PM thresholds of significance would also not conflict with or obstruct implementation of the applicable air quality plans related to PM.

Construction

Less-than-Significant Impact with Mitigation Incorporated. Construction activities associated with the proposed project would result in emissions of criteria air pollutants and ozone precursors, including ROG, NO_x, PM₁₀, and PM_{2.5}, the pollutants for which the project region is designated as nonattainment under either the NAAQS or CAAQS. The project construction-related activities will be required to comply with SMAQMD rules and regulations established, in part, to ensure implementation of and consistency with strategies and actions of the applicable air quality plans. In addition, as detailed below in Impact b and shown in Table 3.3-1, emissions generated during construction would not exceed the SMAQMD thresholds of significance. However, due to the nonattainment status of the SVAB with respect to ozone, PM₁₀, and PM_{2.5}, SMAQMD recommends that all construction projects implement the SMAQMD Basic Construction Emission Control Practices (SMAQMD 2021). SMAQMD's Basic Construction Emission Control Practices include such measures as watering the construction site twice daily, limiting vehicle speeds on unpaved roadways to 15 miles per hour, minimizing vehicle idling, covering haul trucks transporting soil, and cleaning paved roads. The proposed project would not include travel on unpaved roadways and would have minimal earthwork or transport of soil. Regardless, without incorporation of applicable SMAQMD's Basic Construction Control Practices, the project construction activities would be considered to potentially conflict with or obstruct implementation of the SMAQMD's air quality plans for PM and the impact is considered to be **potentially significant**.

Operation

Less-than-Significant Impact. As discussed in Impact "b)" below, operational emissions associated with the proposed project would be below the SMAQMD thresholds of significance, as shown in Table 3.3-2. Therefore, project operations would not conflict with or obstruct implementation of the regional air quality attainment plans, and this impact is considered to be **less than significant**.

Mitigation Measures

Mitigation Measure 3.3-1: Implement the SMAQMD Basic Construction Emission Control Practices.

The San Juan Unified School District shall require that the construction contractor/s comply with Basic Construction Emission Control Practices identified by the SMAQMD and listed below or as they may be updated in the future:

- Water all exposed surfaces two times daily. Exposed surfaces include, but are not limited to soil piles, graded areas, unpaved parking areas, staging areas, and access roads.
- Cover or maintain at least two feet of free board space on haul trucks transporting soil, sand, or other loose material on the site. Any haul trucks that would be traveling along freeways or major roadways should be covered.
- Use wet power vacuum street sweepers to remove any visible track out mud or dirt onto adjacent public roads at least once a day. Use of dry powered sweeping is prohibited.
- Limit vehicle speeds on unpaved roads to 15 miles per hour (mph).
- All roadways, driveways, sidewalks, parking lots to be paved should be completed as soon as possible. In addition, building pads should be laid as soon as possible after grading unless seeding or soil binders are used.
- Minimize idling time either by shutting equipment off when not in use or reducing the time of idling to 5 minutes [required by California Code of Regulations, Title 13, sections 2449(d) and 2485]. Provide clear signage that posts this requirement for workers at the entrances to the site.
- Maintain all construction equipment in proper working condition according to manufacturer's specifications. The equipment must be checked by a certified mechanic and determined to be running in proper condition before it is operated.

Significance after Mitigation

As stated above, emissions associated with long-term operations of the proposed project would not conflict with or obstruct implementation of the regional air quality attainment plans. With incorporation of Mitigation Measure 3.3-1, the proposed project's construction activities would be required to implement applicable emission control practices and would not conflict with or obstruct an applicable air quality attainment plan. This construction impact would be **less than significant with mitigation**.

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

By its very nature, air pollution is largely a cumulative impact. The nonattainment status of regional pollutants is a result of past and present development within the SVAB, and this regional impact is cumulative in nature rather than being attributable to any one source. A single project's emissions may be individually limited, but could be cumulatively considerable when considered in combination with past, present, and future emissions sources within the air basin. The SMAQMD has established project-level construction and operational emissions thresholds of significance for ROG, NO_x, PM₁₀, and PM_{2.5}. If a project's emissions are below the SMAQMD thresholds of significance, the project is not considered to result in a cumulatively considerable contribution to a significant impact on regional air quality (SMAQMD 2021).

Construction

Less-than-Significant Impact with Mitigation Incorporated. Construction-related activities would result in temporary emissions of criteria air pollutants and ozone precursors in the form of both fugitive dust from ground

disturbing activities and vehicle travel on paved roadways, and exhaust emissions from the use of off-road equipment and on-road motor vehicles.

Construction-related emissions were modeled using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.35, which is the most current version of the SMAQMD-recommended model for estimating construction and operational emissions from development projects. Project-specific construction parameters (e.g., construction schedule, total acres disturbed, quantity of export material, estimated construction workers and construction-related vehicle trips) were used as inputs in the air quality analysis. Where project-specific information was not available, CalEEMod default parameters were used. See Appendix A for detailed emissions inputs and assumptions.

As shown in Table 3.3-1, the modeled daily unmitigated emissions generated by construction-related activities would not exceed the SMAQMD-recommended threshold of significance. However, due to the nonattainment status of the SVAB with respect to ozone, PM₁₀, and PM_{2.5}, SMAQMD recommends that all construction projects implement the SMAQMD Basic Construction Emission Control Practices (SMAQMD 2021). SMAQMD's Basic Construction Emission Control Practices include such measures as watering the construction site twice daily, limiting vehicle speeds on unpaved roadways to 15 miles per hour, minimizing vehicle idling, covering haul trucks transporting soil, and cleaning paved roads. Without incorporation of SMAQMD's Basic Construction Emission Control Practices, the project's construction activities could potentially conflict with or obstruct implementation of the SMAQMD's air quality plans for PM. Therefore, construction-related activities could result in a cumulatively considerable net increase of criteria pollutants for which the region is nonattainment, and this impact would be **potentially significant**.

Table 3.3-1. Summary of Unmitigated Construction-Related Emissions of Criteria Air Pollutants and Precursors

Source	Maximum Daily Emissions ROG (pounds per day)	Maximum Daily Emissions NOx (pounds per day)	Maximum Daily Emissions PM ₁₀ (pounds per day)	Maximum Daily Emissions PM _{2.5} (pounds per day)	Maximum Annual Emissions PM ₁₀ (tons per year)	Maximum Annual Emissions PM _{2.5} (tons per year)
Construction Equipment and Vehicles ¹	3.24	28.57	2.02	1.18	0.03	0.02
SMAQMD Significance Threshold ²	-	85	80	82	14.6	15
Emissions Exceed SMAQMD Threshold?	-	No	No	No	No	No

Notes: BMP = Best Management Practices; NO_x = oxides of nitrogen; PM₁₀ = respirable particulate matter with an aerodynamic diameter of 10 micrometers or less; PM_{2.5} = respirable particulate matter with an aerodynamic diameter of 2.5 micrometers or less; ROG = reactive organic gases; SMAQMD = Sacramento Metropolitan Air Quality Management District

¹ PM emissions include implementation of fugitive dust control measures as required by the SMAQMD BMPs, including watering exposed areas two times per day.

² Represents SMAQMD Threshold of Significance with the application of BMPs.

Modeled by AECOM in 2025.

Operation

Less-than-Significant Impact. The proposed project's operations would include an intermittent increase in vehicle trips to the stadium during events, which would generate mobile source emissions of criteria air pollutants and precursors (ROG, NO_x, PM₁₀, and PM_{2.5}). Operational mobile source emissions were estimated in CalEEMod

based on the estimated trip generation rate associated with the proposed project, and region-specific trip lengths. For the purposes of the operational air quality analysis for the Initial Study, the estimated trip generation rate for an event at the stadium (i.e., the daily trip generation rate) is based on a peak event with maximum attendance, resulting in conservative estimates of trip rates and vehicle miles travelled (VMT) as not all events would be expected to be peak events. The annual trip generation rate is based on an assumed 35 events per year (i.e., equivalent to 1 large event each week during the school year), which is conservative based on the fact that there would be 5 home football games and intermittent other sporting and community events throughout the year. See Appendix A for detailed operational inputs and assumptions.

Under existing conditions, vehicle travel occurs by students and other event attendees to attend events, such as football games and graduation ceremonies, off campus. Such activities would be accommodated at the Rio Americano High School with implementation of the proposed project. As such, some vehicle trips associated with operation of the proposed project would be a shift of existing trips within the region from alternative destinations to the Rio Americano High School. This may reduce travel distances for some trips, particularly for students that tend to reside proximate to their home school of Rio Americano High School. The proposed project may also result in an increase in attendance at events, and therefore an increase in trip rates. However, such vehicle travel by students to their home school would be more easily accommodated by alternative travel methods such as biking and walking. Additionally, with implementation of the proposed project, use of the existing diesel-powered lights and associated emissions from fuel combustion would cease, thereby reducing on-site operational emissions. Nonetheless, to provide a conservative analysis, the operational mobile source emissions generated by vehicle trips associated with the proposed project are compared to the SMAQMD significance thresholds, as shown in Table 3.3-2 below. Table 3.3-2 for reference.

Table 3.3-2. Summary of Operational Emissions of Criteria Air Pollutants and Precursors

Operational Sector	Maximum Daily Emissions ROG (pounds per day)	Maximum Daily Emissions NOx (pounds per day)	Maximum Daily Emissions PM ₁₀ (pounds per day)	Maximum Daily Emissions PM _{2.5} (pounds per day)	Maximum Annual Emissions PM ₁₀ (tons per year)	Maximum Annual Emissions PM _{2.5} (tons per year)
Mobile	9.1	6.6	10.2	2.6	0.17	0.05
SMAQMD Significance Threshold ¹	65	65	80	82	14.6	15
Emissions Exceed SMAQMD Threshold?	No	No	No	No	No	No

Notes: BMP = Best Management Practices; NO_x = oxides of nitrogen; PM₁₀ = respirable particulate matter with an aerodynamic diameter of 10 micrometers or less; PM_{2.5} = respirable particulate matter with an aerodynamic diameter of 2.5 micrometers or less; ROG = reactive organic gases; SMAQMD = Sacramento Metropolitan Air Quality Management District

¹ Represents SMAQMD Threshold of Significance with the application of applicable BMPs.

Data compiled by AECOM in 2025.

As shown in Table 3.3-2, total operational emissions would not approach or exceed any SMAQMD threshold based on the estimated trip generation rate. This comparison to the SMAQMD thresholds shows that operations would not contribute substantially to any existing or projected air quality violation or conflict with efforts to reach attainment of any air quality standards. Therefore, this impact would be **less than significant**.

Mitigation Measures

Implement Mitigation Measure 3.3-1: Implement the SMAQMD Basic Construction Emission Control Practices.

Significance After Mitigation

As stated above, emissions associated with long-term operations of the proposed project would be below the SMAQMD thresholds of significance and therefore less than significant. The recommended Mitigation Measure 3.3-1 detailed above requires SMAQMD-required emission control practices and construction-related emissions would be less than the SMAQMD-recommended thresholds of significance. This impact would be **less than significant with mitigation**.

c) Expose sensitive receptors to substantial pollutant concentrations?

Although air pollution can affect all segments of the population, certain groups are more susceptible to its adverse effects than others. Children, the elderly, and the chronically or acutely ill are the most sensitive population groups. These sensitive receptors are commonly associated with specific land uses such as residential areas, schools, retirement homes, and hospitals.

Residential areas are considered sensitive to air pollution because residents (including children and the elderly) tend to be at home for extended periods of time, resulting in sustained exposure to the pollutants present.

Recreational land uses are considered moderately sensitive to air pollution. Exercise places a high demand on respiratory functions, which can be impaired by air pollution, even though exposure periods during exercise are generally short. In addition, noticeable air pollution can detract from the enjoyment of recreation. Industrial and commercial areas are considered the least sensitive to air pollution. Exposure periods are relatively short and intermittent as the majority of the workers tend to stay indoors most of the time.

Existing sensitive receptors located adjacent to, or in the vicinity of the project site consist of existing single-family residential subdivisions north and northeast of the project site, and high school buildings to the southwest of the project site. In addition to the students at Rio Americano High School, the nearest sensitive receptors are the residences in the area surrounding the campus and the single closest sensitive receptor is a residence located approximately 50 feet northeast of the stadium.

Criteria Air Pollutants and Ozone Precursors

Criteria air pollutants can be classified as either regional or localized pollutants. Regional pollutants can be transported over long distances and affect ambient air quality far from the emissions source. Localized pollutants affect ambient air quality near the emissions source. Ozone is considered a regional criteria pollutant, whereas carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), and lead are localized pollutants. PM can be both a local and a regional pollutant, depending on its composition.

Criteria air pollutants can have human health effects at various concentrations, dependent upon the duration of exposure and type of pollutant. Adverse health effects induced by regional criteria air pollutant emissions generated by the project (ozone precursors and PM) are highly dependent on a multitude of interconnected variables (e.g., cumulative concentrations, local meteorology and atmospheric conditions, the number and character of exposed individuals [e.g., age, gender]). For these reasons, ozone precursors (ROG and NO_x)

contribute to the formation of ground-borne ozone on a regional scale, where emissions of ROG and NO_x generated in one area may not equate to a specific ozone concentration in that same area. Similarly, some types of particulate pollutants may be transported over long distances or formed through atmospheric reactions. As such, the magnitude and locations of specific health effects from exposure to increased ozone or regional PM concentrations are the product of emissions generated by numerous sources throughout a region, as opposed to a single individual project.

Existing models have limited sensitivity to small changes in regional criteria pollutant concentrations, and as such, translating project-generated regional criteria pollutants to specific health effects would not produce meaningful results. In other words, minor increases in regional air pollution from project-generated ROG and NO_x would have nominal or negligible impacts on human health. Currently, CARB and EPA have not approved a quantitative method to meaningfully and consistently translate the mass emissions of criteria air pollutants from a project to quantified health effects. As explained in the amicus brief filed by the South Coast Air Quality Management District (SCAQMD) in the *Sierra Club v. County of Fresno* (2014) 26 Cal.App.4th 704, it “takes a large amount of additional precursor emissions to cause a modeled increase in ambient ozone levels” (SCAQMD 2015).

In 2020, SMAQMD published Guidance to Address the *Friant Ranch* ruling for CEQA Projects in the Sac Metro Air District (SMAQMD 2020), which provides a screening level analysis estimating the health effects of criteria air pollutants and their precursors, as well as provides guidance for conducting a health effects analysis of a project that satisfies the requirements of the *Sierra Club v. County of Fresno*, 2018, 6 Cal. 5th 502 case ruling regarding the proposed Friant Ranch Project. The Guidance was prepared by conducting regional photochemical modeling and relies on the EPA’s Benefits Mapping and Analysis Program to assess health impacts from ozone and PM_{2.5}. Analysis was conducted to estimate the level of health effects for a proposed project that has emissions at the maximum SMAQMD-recommended thresholds of significance using 41 hypothetical project locations, as well as a screening model conducted to estimate potential health effects for strategic areas where development is anticipated to cause exceedance of thresholds of significance. The results were used to develop two screening tools intended to support individual projects in analyzing health risks from criteria pollutants: the Minor Project Health screening Tool for projects with criteria pollutant emissions below SMAQMD’s adopted thresholds of significance, and the Strategic Area Project Health Screening Tool for projects with emissions between two and six times the SMAQMD threshold levels. As noted in SMAQMD’s Friant Guidance, “each model generates conservative estimates of health effects, for two reasons: The tools’ outputs are based on the simulation of a full year of exposure at the maximum daily average of the increases in air pollution concentration... [and] [t]he health effects are calculated for emissions levels that are very high” (SMAQMD 2020). The modeling results support a conclusion that any one proposed project in the SFNA, which is inclusive of the project site, with emissions at or below the maximum SMAQMD thresholds of significance levels for criteria air pollutants does not on its own lead to sizeable health effects.

Since the proposed project would be below the daily operational thresholds for criteria air pollutants, the Minor Project Health Screening Tool was used to estimate health risks. The results are shown in Minor Project Health Screening Table in Appendix A.

It is important to note that the Minor Project Health Screening Tool applies emissions of 82 pounds per day of each pollutant, not the actual emissions of a given project. In the case of the proposed project, estimated operational emissions would be less than 11 pounds per day of each respective criteria air pollutant modeled by

the Tool, which is less than 14 percent of the mass emissions used by the Minor Project Health Screening Tool. Construction emissions of PM₁₀ and PM_{2.5} would be 3 percent and 1 percent, respectively, of the mass emissions used by the Tool, while construction NO_x emissions would be 33 percent of the mass emissions used by the Tool. However, these construction emissions represent maximum daily emissions, which would not occur throughout the entire construction duration. Additionally, construction emissions would be short-term and temporary and would cease following completion of construction. For each of these reasons, it would be misleading to correlate the levels of criteria air pollutant and precursor emissions associated with project implementation to specific health outcomes. While the effects noted above could manifest in individuals, actual effects depend on factors specific to each individual, including life stage (e.g., older adults are more sensitive), preexisting cardiovascular or respiratory diseases, and genetic polymorphisms. Even if this specific medical information was known about each individual, there are wide ranges of potential outcomes from exposure to ozone precursors and particulates, from no effect to the effects listed in the tables. Ultimately, the health effects associated with the project, using the SMAQMD guidance “are conservatively estimated, and the actual effects may be zero” (SMAQMD 2020).

As shown in Table 3.3-1 and Table 3.3-2, construction and operation of the proposed project would result in minimal emissions of criteria air pollutants, at levels that would be substantially below the SMAQMD regional thresholds of significance. As described previously, the SMAQMD modeling indicated that a project with emissions below the SMAQMD thresholds of significance would not lead to sizeable health effects on its own. In addition, the tool’s outputs are based on the simulation of a full year of exposure at the maximum daily average exposure, which is not a realistic scenario. As discussed above, the nature of criteria pollutants is such that the emissions from an individual project cannot be directly identified as responsible for health impacts within any specific geographic location. As a result, attributing health risks at any specific geographic location to a single project is not feasible, and this information and consideration is presented for informational purposes only.

Construction-Related TAC Emissions

Less-than-Significant Impact. Construction-related activities would generate toxic air contaminant (TAC) emissions from what is anticipated to be very minor use of heavy-duty construction equipment, vendor trucks, and construction worker vehicles. These activities could expose nearby receptors to TACs, primarily in the form of diesel particulate matter (DPM) generated by the diesel-fueled trucks and equipment. More than 90 percent of DPM is less than 1 micrometer in diameter, and thus is a subset of PM_{2.5} emissions presented in Table 3.3-1 (CARB n.d.).

Health risk is a function of the concentration of contaminants in the environment and the duration of exposure to those contaminants. The risks estimated for an exposed individual are higher if a fixed exposure occurs over a longer period of time. Health effects from TACs are often described in terms of individual cancer risk, which is based on a 30-year lifetime exposure to TACs for residences (OEHHA 2015). Based on the four month duration of construction, the potential exposure of a nearby sensitive receptor to construction emissions would be less than two percent of the total exposure period used for typical health risk calculations (i.e., 30 years). Even during this period of time, construction activities would vary in activity and equipment intensity, and would take place at various locations throughout the project site. Within the project site, equipment would generally be concentrated at the locations of pole and bleacher installation, which are approximately 50 feet from the nearest students and approximately 250 feet from the nearest residents. Concentrations of mobile-source DPM emissions are typically reduced by approximately 60 percent at a distance of around 300 feet from the source (Zhu and Hinds 2002), and by 70 percent at approximately 500 feet (CARB 2005). Therefore, construction activities and associated DPM

concentrations would not be concentrated along the project boundary closest to off-site residents for extended periods of time. Additionally, the fields located north-northwest of the stadium provide a 700 to 900-foot buffer between the limited diesel emissions from construction and sensitive receptors, while residences located on the northeastern side of the stadium are buffered by vegetation within their properties. Existing student classrooms are located approximately 100 feet from proposed construction activities; however, construction activities are anticipated to begin in June 2027 after the school year is completed to reduce potential overlap of construction activities with times when students would be present on campus.

The dose to which receptors are exposed is the primary factor used to determine health risk. Dose is a function of the concentration of a substance or substances in the environment and the extent to which a person is exposed to the substance. As described above, PM_{2.5} emissions during construction would be well below the SMAQMD's threshold of significance of 82 pounds per day (Table 3.3-1). The maximum daily on-site exhaust PM_{2.5} emissions would be a subset of the total PM_{2.5} emissions shown in Table 3.3-1, which include fugitive dust and exhaust PM_{2.5} emissions generated by both on-site equipment and off-site construction worker, vendor, and haul vehicles traveling to and from the project site; as detailed in Appendix A, the maximum daily on-site exhaust PM_{2.5} emissions are estimated to be less than 0.34 pounds per day. The maximum daily emissions would only occur if all anticipated equipment were operated simultaneously all day for a given day, which is unlikely. Furthermore, the level of peak emissions accounts for peak construction activity that may occur intermittently but would not occur throughout the entire four-month construction duration. As a result, the exposure of sensitive receptors to construction emissions would be short term, intermittent, and temporary in nature.

Project construction would also be required to comply with all applicable SMAQMD rules and regulations, including idling restrictions. Because of the intermittent and temporary nature of construction activities at any given location, and the dispersive properties of TACs, as well as the fact that PM_{2.5} exhaust emissions would be far less than one pound per day on average, temporary construction activities would not expose sensitive receptors to substantial TAC concentrations. Therefore, this impact would be **less than significant**.

Operational TAC Emissions

Less-than-Significant Impact. Operational emissions would be generated by vehicle trips to and from the stadium, which would primarily be associated with passenger vehicles that are predominantly gasoline-powered and not a significant source of DPM. Vehicle trips by larger vehicles such as buses to transport students would generate DPM; however, these vehicle trips represent a minimal percentage of total vehicle trips associated with the proposed project operations. As shown in Table 3.3-2, maximum daily PM_{2.5} emissions, which represent the estimated peak vehicle travel to the stadium on the day of an event, would be approximately 2.6 pounds per day and well below the SMAQMD threshold of significance. Additionally, these emissions include both exhaust PM_{2.5} and fugitive PM_{2.5} emissions from tire and brake wear, as well as re-entrained road dust from on-road vehicle travel; as detailed in Appendix A, the maximum daily exhaust PM_{2.5} emissions are estimated to be 0.08 pounds per day. Finally, mobile source emissions associated with the proposed project would occur over the length of travel and would not be concentrated in one location.

Additionally, implementation of the proposed project would replace the existing diesel-powered lighting at the stadium with electrically-powered lights. The existing diesel-powered lighting operates for several hours each day past dusk throughout the fall and winter months. Therefore, on-site operational TAC emissions would be reduced with implementation of the proposed project.

In summary, due to the minimal TAC emissions generated by operation of the proposed project and the dispersive nature of mobile TAC emissions, in addition to the reduction in on-site TAC emissions with the replacement of the existing diesel-powered lights with electrical-powered lights, operation of the proposed project would not expose sensitive receptors to substantial pollutant concentrations. This impact would be **less than significant**.

Carbon Monoxide Hotspots

A mobile-source pollutant of localized concern is CO. Continuous engine exhaust may elevate localized CO concentrations, or “hot spots.” The SMAQMD CEQA Guidance acknowledges that land use development projects do not typically have the potential to result in localized concentrations of criteria air pollutants that expose sensitive receptors to substantial pollutant concentrations, in part, because the predominant source of these pollutants is typically in the form of mobile-source exhaust from vehicle trips that occur throughout a network of roads and are not concentrated in a single location.

Emissions and ambient concentrations of CO have decreased substantially throughout California in the past three decades. The national statewide CO standard is attained statewide in California, and an exceedance of NAAQS or CAAQS in the region was last recorded in 1993. This is primarily attributable to requirements for cleaner vehicle emissions. CO hot spots are typically observed at heavily congested roadway intersections where a substantial number of gasoline-powered vehicles idle for prolonged durations throughout the day. Construction sites are less likely to result in localized CO hot spots due to the nature of construction activities, which normally utilize diesel-powered equipment for intermittent or short durations. Note that while the SMAQMD CEQA guidance previously contained screening criteria to determine whether project impacts of localized CO concentrations were less than significant, this has been removed, and the CEQA guidance states: *“As of June 1, 2018, the US EPA documented that transportation conformity requirements no longer apply for CO in the Sacramento region. Sacramento has demonstrated 20 years of maintenance of the federal 8-hour CO standard.”* (SMAQMD 2021).

The proposed project would not result in prolonged idling throughout the day, nor contribute substantially to regionally high-volume, congested roadways. For the purposes of this air quality analysis for the Initial Study, the proposed project operational trip generation during intermittent peak events was estimated to be 1,250 vehicles, associated with a peak attendance event at the stadium. As described above, SMAQMD no longer has a numerical threshold of the level of vehicles at which a CO hotspot would occur because the region is in attainment for the CO standard. However, for reference purposes, guidance from the Bay Area Air District regarding CO hotspots was reviewed. According to the Bay Area Air District CEQA Guidelines (Bay Area Air District 2022), a proposed project would result in less-than-significant operational impacts to CO hotspots if project-generated traffic would not increase traffic volumes at affected intersections to more than 44,000 vehicles per hour or 24,000 vehicles per hour where vertical and/or horizontal mixing is substantially limited (e.g., tunnel, parking garage, bridge underpass, natural or urban street canyon, below-grade roadways). The surrounding intersections at which vehicle trips may increase are not locations of typically limited vertical and/or horizontal mixing of ambient air. Traffic counts from the Sacramento County Open Data Portal indicate that from 2020-2024, the maximum 24-hour traffic count at the intersection of American River Drive and Saverien Drive (located in front of Rio American High School) was 6,461 vehicles (i.e., average of 269 vehicles per hour) (Sacramento County 2025). While the level of vehicles per hour at affected intersections may be higher on the day of a peak event, it would not be expected to approach 44,000 vehicles per hour with the addition of trips generated by the proposed project. Due to the low level of new trips that would be generated by the project, improved vehicle emissions standards for CO, and lack of conditions that would limit dispersion of CO emissions from vehicle exhaust, the proposed project would not

be expected to violate air quality standards for CO nor have the potential to result in CO hotspots. This impact would be **less than significant**.

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

The occurrence and severity of odor impacts depend on numerous factors, including the nature, frequency, and intensity of the source; wind speed and direction; and the presence of sensitive receptors. Typically, odors are generally regarded as an annoyance rather than a health hazard. However, manifestations of a person's reaction to foul odors can range from the psychological (i.e., irritation, anger, or anxiety) to the physiological, including circulatory and respiratory effects, nausea, vomiting, and headache. The ability to detect odors varies considerably among the population and overall is quite subjective.

Sources that may emit odors during construction activities include exhaust from diesel construction equipment and heavy-duty trucks, which could be considered offensive to some individuals. Odors from these sources would be localized and generally confined to the immediate area surrounding the source. The project would use typical construction techniques, and the odors would be typical of most construction sites and temporary in nature. Project operation would also not add any new sources of odors. The project would continue to utilize land for school activities and would remain similar to existing conditions. The land uses associated with the project are school-related and would not include the typical odor-generating land uses.

SMAQMD has identified the following land uses that could be of concern in relation to odors: wastewater treatment plants; sanitary landfills; composting/green waste facilities; recycling facilities; petroleum refineries; chemical manufacturing plants; painting/coating operations; rendering plants; and food packaging plants (SMAQMD 2021). As a result, the project would not result in other emissions, such as those leading to odors, adversely affecting a substantial number of people. This impact would be **less than significant**.

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3.4 BIOLOGICAL RESOURCES

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

3.4.1 DISCUSSION

- a) **Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?**

PROTECTED SPECIES

Special-Status Species

Special-status species considered in this Initial Study include plants and wildlife in the following categories:

- species officially listed or proposed for listing by the State of California or the federal government as endangered, threatened, or rare;
- candidates for State or federal listing as endangered or threatened;

- species identified by the California Department of Fish and Wildlife (CDFW) as Species of Special Concern;
- species listed as Fully Protected under the California Fish and Game Code;
- taxa assigned a California Rare Plant Rank (CRPR) of 1A, 1B, 2A, or 2B, which are summarized as follows:
 - CRPR 1A - Plants presumed to be extinct in California;
 - CRPR 1B - Plants that are rare, threatened, or endangered in California and elsewhere;
 - CRPR 2A - Plants presumed to be extinct in California, but more common elsewhere;
 - CRPR 2B - Plants that are rare, threatened, or endangered in California, but more common elsewhere;
 and
- taxa (i.e., taxonomic categories or groups) that meet the criteria for listing, even if not currently included on any list, as described in Section 15380 of the California Environmental Quality Act (CEQA) Guidelines.

A list of special-status species that could potentially occur in or near the project site was developed through queries of CDFW's California Natural Diversity Database (CNDDDB) for a 5-mile radius of the project site (CDFW 2025), California Native Plant Society's (CNPS's) Rare Plant Inventory (CNPS 2025) for the U.S. Geological Survey 7.5-minute quadrangle in which the project site is located, and U.S. Fish and Wildlife Service's (USFWS's) Information for Planning, and Consultation for the project site (USFWS 2025a) (Table BR-1). Of the 25 species identified in the database queries, no special-status plant species and five special-status wildlife species have the potential to occur within or adjacent to the project site and to be impacted by project implementation. The five special-status wildlife species with the potential to occur are: valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*), northwestern pond turtle (*Actinemys marmorata*), Swainson's hawk (*Buteo swainsoni*), white-tailed kite (*Elanus leucurus*), and the Modesto population of song sparrow (*Melospiza melodia*, pop. 1).

Special-Status and Nesting Birds

The Migratory Bird Treaty Act of 1918 prohibits killing, possessing, or trading in migratory birds, and protects the nesting activities of native birds including common species. Some mature deciduous and evergreen trees are present within the project site, particularly along the campus boundary south of Raider Stadium. These mature trees provide potential nesting habitat for birds, especially due to the project site's proximity to high-quality riparian habitat along the American River Parkway. Ground-nesting bird species are unlikely to nest within or immediately adjacent to the project site due to the regularly occurring vegetation management of the turf lawns and levee slopes but could nest in the pockets of grassland in the American River Parkway south of the project site.

Table 3.4-1. Special-Status Species with Potential to Occur within or near the Project Site.

Common Name	Scientific Name	Status¹	Habitat and Seasonal Distribution in California	Potential to Occur within the Project Site or Species-Specific Buffer
Plants				
Boggs Lake hedge-hyssop	<i>Gratiola heterosepala</i>	SE, 1B.2	Margins of marshes and swamps and vernal pools. 35–7,590 feet amsl	No potential to occur. The project site does not contain suitable habitat.
Ahart's dwarf rush	<i>Juncus leiospermus</i> var. <i>ahartii</i>	1B.2	Mesic valley and foothill grassland. 100–750 feet amsl	No potential to occur. The project site does not contain mesic habitat and is outside the species' elevation range.
Legenere	<i>Legenere limosa</i>	1B.1	Vernal pools. 5–2,885 feet amsl	No potential to occur. The project site does not contain suitable habitat.
Slender Orcutt grass	<i>Orcuttia tenuis</i>	FT, SE, 1B.1	Vernal pools. 115–5,775 feet amsl	No potential to occur. The project site does not contain suitable habitat.
Sacramento Orcutt grass	<i>Orcuttia viscida</i>	FE, SE, 1B.1	Vernal pools. 100–330 feet amsl	No potential to occur. The project site does not contain suitable habitat.
Sanford's arrowhead	<i>Sagittaria sanfordii</i>	1B.2	Shallow freshwater marshes and swamps. 0–2,135 feet amsl	No potential to occur. The project site does not contain suitable habitat.
Crustaceans				
Conservancy fairy shrimp	<i>Branchinecta conservation</i>	FE	Large, deep vernal pools in annual grasslands.	No potential to occur. The project site does not contain suitable habitat.
Vernal pool fairy shrimp	<i>Branchinecta lynchi</i>	FT	Vernal pools and similar habitats, such as sandstone-depression pools, grass- or mud-bottomed swales, and basalt-flow depression pools, in the Central Valley and Central Coast mountains.	No potential to occur. The project site does not contain suitable habitat.
Vernal pool tadpole shrimp	<i>Lepidurus packardii</i>	FE	Vernal pools and swales in the Sacramento Valley.	No potential to occur. The project site does not contain suitable habitat.
Insects				
Valley elderberry longhorn beetle	<i>Desmocerus californicus dimorphus</i>	FT	Blue elderberry (<i>Sambucus mexicana</i>) host plants for egg-laying and larval development. Generally occurs along waterways and in floodplains only in the Central Valley.	Potential to occur. Blue elderberry, the species' host plant, is present in the project site and potentially in riparian habitat in the American River Parkway adjacent to the project site.
Monarch butterfly	<i>Danaus plexippus</i>	FPT	Eucalyptus (<i>Eucalyptus</i> spp.), Monterey pines (<i>Pinus radiata</i>), and Monterey cypresses (<i>Hesperocyparis macrocarpa</i>) for overwintering, and milkweed (<i>Asclepias</i> spp.) for egg-laying and larval development.	Unlikely to occur. The project site is outside the species' winter range, and regular mowing of grass within the project site and on the levee slopes adjacent to the project site likely precludes milkweed presence and monarch occupation for breeding.

Common Name	Scientific Name	Status ¹	Habitat and Seasonal Distribution in California	Potential to Occur within the Project Site or Species-Specific Buffer
Crotch's bumble bee	<i>Bombus crotchii</i>	SCE	Open grassland and scrub for underground nests; forages on floral resources like milkweed, lupine (<i>Lupinus</i> spp.), and sage (<i>Salvia</i> spp.). Pacific Coast, Central Valley, and foothills throughout most of California.	Unlikely to occur. Regular mowing of the project site likely deters ground nesting and overwintering.
Fish				
Steelhead – Central Valley DPS	<i>Oncorhynchus mykiss irideus</i> pop. 11	FT, SSC	Riparian, emergent, and palustrine habitat in the Sacramento and San Joaquin rivers. Spawns and rears in perennial streams with clear, cool, fast-flowing water and abundant gravels and riffles.	No potential to occur. The project site does not contain suitable aquatic habitat. Project implementation will not impact aquatic habitat in the American River
Amphibians				
Western spadefoot	<i>Spea hammondi</i>	FPT, SSC	Open areas with sandy or gravelly soils in a variety of habitats including grasslands, woodlands, chaparral, sandy washes, lowlands, and floodplains. Breeds in vernal pools and temporary rain pools and occasionally intermittent streams following winter and spring rains. Aestivates in burrows in loose soils away from the dried breeding pools.	No potential to occur. No suitable breeding habitat is present adjacent to the project site, and regular disturbance of turf grass in the project site likely would deter aestivation.
Reptiles				
Northwestern pond turtle	<i>Actinemys marmorata</i>	FPT, SSC	Ponds, marshes, rivers, streams, and irrigation ditches, usually with aquatic vegetation, below 6,000 feet amsl. Needs basking sites and suitable upland habitat for egg laying within 0.3 mile of water.	Potential to occur. The project site is within 0.3 mile of suitable aquatic habitat in the American River and adjacent riparian habitat in the American River Parkway. Vegetation management of the project site and the levee slopes adjacent to the project site likely preclude nesting, but the species may bask on the levee slopes or disperse through the area. Fencing around the school campus limits access to the project site.
Birds				
Golden eagle	<i>Aquila chrysaetos</i>	FP	Rolling foothills, mountain ranges, sage-juniper flats, and desert. Nests on cliffs and escarpments or in tall trees overlooking open country. Forages in annual grassland, chaparral, and oak woodland with plentiful medium- and large-sized mammals.	Unlikely to occur. A nonbreeding transient could pass through the vicinity of the project site, but suitable breeding and foraging habitat are not present in or adjacent to the project site.

Common Name	Scientific Name	Status¹	Habitat and Seasonal Distribution in California	Potential to Occur within the Project Site or Species-Specific Buffer
Swainson's hawk	<i>Buteo swainsoni</i>	ST	Riparian areas, juniper sage flats, and oak savannah for nesting adjacent to open grasslands or grain fields for foraging. Migrates south during winter months	Potential to occur. Suitable riparian nesting habitat is present in the American River Parkway adjacent to the project site
White-tailed kite	<i>Elanus leucurus</i>	FP	Open grasslands, emergent wetlands, meadows, and farmlands with sparse trees for perching and nesting. Nesting occurs in trees with dense canopies for cover.	Potential to occur. Suitable riparian nesting habitat is present in the American River Parkway adjacent to the project site
Western yellow-billed cuckoo	<i>Coccyzus americanus occidentalis</i>	FT, SE	Wooded habitat with dense cover and water nearby. Breeds in low- to moderate-elevation native forests lining the rivers and streams of the western United States. Cottonwood-willow forests are most often used, although other riparian tree species can be important components of breeding habitat as well. Current breeding range in California is highly restricted and, within the Central Valley, limited to the northern Sacramento valley from Red Bluff to Colusa	Unlikely to occur. The project site is well outside the species' current breeding range. Individuals may use riparian habitat within the American River Parkway as a stopover site during migration but are unlikely to occur within the marginal habitat in the project site.
Western burrowing owl	<i>Athene cunicularia hypugaea</i>	SCE, SSC	Areas with low vegetation in agricultural fields and native low-lying grasslands; can also occur in urban and suburban areas. Requires burrows, typically those created by ground squirrels (<i>Otospermophilus beecheyi</i>), for cover and nesting but may also use alternatives such as rocky crevices in riprap or open pipes.	Unlikely to occur. The project site and vicinity do not provide large areas of open habitat suitable for the species.
Purple martin	<i>Progne subis</i>	SSC	Tree cavities, bridges, freeway overpasses, and lava tubes for nesting. Forages in foothill and low montane oak and riparian woodlands; less frequently in coniferous forests and open or developed habitats.	Unlikely to occur. Riparian habitat suitable for foraging is present along the American River Parkway, but the only known breeding in the Sacramento region occurs in weep holes in bridges west of the project site.
Bank swallow	<i>Riparia riparia</i>	ST	Unvegetated vertical banks or cliffs with fine-textured, sandy soils, typically next to water bodies, for nesting. Forages in a variety of habitats near nests	No potential to occur. Suitable vertical banks for nesting are not present in or adjacent to the project site

Common Name	Scientific Name	Status ¹	Habitat and Seasonal Distribution in California	Potential to Occur within the Project Site or Species-Specific Buffer
Song sparrow, "Modesto" population	<i>Melospiza melodia</i> pop. 1	SSC	Freshwater marshes dominated by bulrushes (<i>Schoenoplectus</i> spp.), cattails (<i>Typha</i> spp.), and riparian willow (<i>Salix</i> spp.) thickets; also riparian forest with understory shrubs and vegetated irrigation canals. North-central portion of the Central Valley, with the highest densities in the Butte Sink area and the Sacramento-San Joaquin Delta.	Potential to occur. Suitable riparian nesting habitat is present in the American River Parkway adjacent to the project site.
Tricolored blackbird	<i>Agelaius tricolor</i>	ST, SSC	Marshes, riparian scrubs, and areas that support cattails or dense thickets of shrubs or herbs for nesting. Forages in agricultural lands and grasslands.	No potential to occur. Suitable nesting and foraging habitat are not present in or adjacent to the project site.
Mammals				
American badger	<i>Taxidea taxus</i>	SSC	Dry, open shrub, forest, and herbaceous habitats with friable soils for digging burrows.	Unlikely to occur. The project site and vicinity do not provide large areas of open habitat suitable for the species.

Notes: amsl = above mean sea level, DPS = distinct population segment

¹ Regulatory Status Categories

Federal

FE = listed as endangered under the federal Endangered Species Act

FPT = proposed for listing as threatened under the federal Endangered Species Act

FT = listed as threatened under the federal Endangered Species Act

State

FP = designated as fully protected under the California Fish and Game Code

SCE = candidate for listing as endangered under the California Endangered Species Act

SE = listed as endangered under the California Endangered Species Act

SSC = California Department of Fish and Wildlife Species of Special Concern

ST = listed as threatened under the California Endangered Species Act

California Rare Plant Ranks (CRPR)

1B = considered rare or endangered in California and elsewhere

CRPR Threat Rank Extensions

.1 = seriously endangered in California (>80% of occurrences are threatened and/or high degree and immediacy of threat)

.2 = fairly endangered in California (20 to 80% of occurrences are threatened)

Roosting Bats

The State of California provides legal protection for all bat species under a number of different laws and regulations including Fish and Game Code Sections 4150 and 4152, Code of Regulations Title 14 Section 251.1, Penal Code Section 597. Three Species of Special Concern have a potential to roost or forage in the project vicinity including pallid bat (*Antrozous pallidus*), Townsend's big-eared bat (*Corynorhinus townsendii*), and western red bat (*Lasiurus frantzii*). Bat roosting habitat can exist in buildings and other human-made structures, and in natural structures such as trees and rock outcroppings. AECOM biologist conducted a daytime bat roost habitat assessment on July 25, 2025 in a survey area of approximately 500 feet around Raider Stadium. The survey area was field-fit based on the quality of potential roost habitat and the amount of light and noise buffering between the stadium and the potential roost habitat. No indications of roosting were found on any of the structures assessed in the survey area around Raider Stadium. However, a row of large trees (mostly eucalypts species) located along the southern fenceline between Raider Stadium and the American River Parkway contain cavities and flaking bark that could provide suitable roosting habitat. As a result, dusk emergence surveys of these trees were conducted over four nights in July and August 2025. No bats were detected emerging from any of these trees, and bats were detected foraging along the side of the playing field. Therefore, no roosting bats are expected within the project improvements area or adjacent trees, and the playing field and surrounding vegetated areas provide confirmed foraging habitat. See Appendix B to this Initial Study for more information regarding the bat roost habitat assessment.

CONSTRUCTION

The proposed project does not include any tree removal or removal of any grassland or shrub habitat that could be used for nesting, roosting, or foraging by birds or bats. The proposed project also does not include removal or trimming of any blue elderberry that may be hosting valley elderberry longhorn beetle. Therefore, the proposed project would not have any direct impacts on nesting birds, roosting bats, or other special-status wildlife species through habitat removal.

Construction activities during the summer months could cause temporary and potentially significant impacts to bats if construction disturbance (e.g., noise and unusual human activity) were to cause the abandonment of an active maternity roost nearby. If mother bats were to abandon a roost occupied by nonvolant pups (pups that cannot fly), pup mortality would result. However, because surveys found no indications of roosting bats within the project disturbance area, no temporary construction impacts to roosting bats are expected. Project construction would occur adjacent to blue elderberry habitat suitable for valley elderberry longhorn beetle. This habitat and any valley elderberry longhorn beetle occupying it have the potential to be impacted by hazardous material spills, erosion, or dust generated by project construction activities. Nonetheless, the following mitigation measures, which include training construction personnel about special-status species and measures for their protection as well as spatial avoidance of blue elderberry shrubs, would be incorporated to avoid and minimize impacts to valley elderberry longhorn beetle during project construction:

Mitigation Measure 3.4-1:

Environmental Awareness Training: A qualified biologist will provide environmental awareness training to the construction lead, construction foreman, crew leader, and any contractor personnel working on the construction site. Environmental awareness training will include descriptions of all special-status species potentially occurring in the project area, their habitats, and methods of identification, including

visual aids as appropriate. The training will also describe activity-specific measures that will be followed to avoid impacts to sensitive species and habitats.

Mitigation Measure 3.4-2:

Blue Elderberry Avoidance: Prior to Project construction, all blue elderberry within 165 feet of the Project footprint will be flagged or otherwise marked for avoidance (e.g., staked, fenced). Construction activity will have an avoidance area of at least 20 feet from the dripline of existing blue elderberry shrubs where feasible. A qualified biologist will monitor all work within the 20-foot avoidance buffer to ensure blue elderberry are not inadvertently damaged during construction activities. Herbicides will not be used within the dripline, and insecticides will not be used within 100 feet of the dripline.

The fencing surrounding the project site precludes access for northwestern pond turtles, so project construction is not expected to result in direct injury or mortality of turtles. However, the project site is located within approximately 350 feet of suitable aquatic habitat for northwestern pond turtle in the American River, and northwestern pond turtles could use upland habitat in the American River Parkway adjacent to the river for basking, nesting, overwintering, cover, and dispersal. The vegetation management along the levee slopes within 100 feet of the southern perimeter of the project site would likely deter nesting or aestivation, but northwestern pond turtles have the potential to occur along the levee slopes when basking or dispersing. Increased disturbance (e.g., noise, vibration) from project construction activities could cause northwestern pond turtles in the project vicinity to alter their behavior or leave refugia, potentially exposing them to predators or other risks. Project construction could also impact habitat quality through unintentional releases of hazardous materials. Sensitive life stages of northwestern pond turtles (i.e., overwintering or nesting individuals) are unlikely to be present within 100 feet of project construction activities, and any turtles that may be present along the levee slopes would be mobile and could move toward more suitable habitat along the American River to avoid temporary disturbances during construction. Nonetheless, the following mitigation measure will be implemented, along with Mitigation Measure 3.4-1, to avoid and minimize any potential impacts to northwestern pond turtle during project construction:

Mitigation Measure 3.4-3:

- a) **Preconstruction Surveys:** A qualified biologist will survey the work site and a 250-foot buffer for northwestern pond turtles and, if construction is initiated during the nesting season (roughly May through July), a qualified biologist will survey for northwestern pond turtle nesting activity (e.g., recently excavated nests, nest plugs, or nest depredation) no more than 48 hours before the initiation of construction activities. Preconstruction surveys to detect northwestern pond turtle nesting activity will focus on areas with bare, hard-packed soils or sparse, low-statured vegetation.
- b) **Nest Avoidance:** If an active northwestern pond turtle nest is discovered, a no-disturbance buffer will be established by the qualified biologist in consideration of environmental conditions (e.g., topography, line of sight) and project activities; typical no-disturbance buffers are 100 feet. The biologist will flag or otherwise mark (e.g., stake, fence) the buffer for avoidance, and no project activities will occur within the no-disturbance buffer unless monitored by a qualified biologist or until the biologist has determined the nest is no longer active. The biologist will have the authority to stop construction activities with the potential to impact northwestern pond turtles.

- c) **Northwestern Pond Turtle Encounters:** If a northwestern pond turtle is encountered during construction, all activities within a 50-foot radius of the animal will stop, and the qualified biologist will be notified. The animal will be allowed to move out of the area upon its own volition. If the animal does not move out of the area of its own volition, it may be relocated by an approved biologist, in coordination with CDFW as appropriate.

Project construction would occur within 250 feet of suitable nesting habitat for Swainson's hawk, white-tailed kite, the Modesto population of song sparrow, and other protected bird species. If construction occurs within the nesting bird season (February 1 to September 15), construction noise and vibration could disturb nesting birds, potentially resulting in nest abandonment or failure. The following mitigation measure will be implemented, in addition to Mitigation Measure 3.4-1, to avoid and minimize potential construction impacts to nesting birds:

Mitigation Measure 3.4-4:

- a) **Preconstruction Surveys:** If project activities occur during the nesting period for birds (February 1 to September 15), a qualified biologist will complete two pre-activity surveys for nesting birds including, but not limited to, Swainson's hawk, white-tailed kite, song sparrow, other raptors and passerines, and heron and egret rookeries. One survey, focused on nesting raptors, will be conducted by a qualified biologist within the Swainson's hawk survey period immediately preceding the commencement of construction activities (SHTAC 2000), and a second survey for all nesting birds will be conducted no more than 3 days prior to the start of construction activities. Surveys will be conducted within suitable nesting habitat that could be affected by project construction activities and will include the project site and accessible areas surrounding the project site, with a 0.25-mile buffer for Swainson's hawk, 500-foot buffer for other raptors, and 250-foot buffer for other bird species (e.g., passerines). Where appropriate, pre-activity surveys will follow established survey guidelines (i.e., *Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley* [SHTAC 2000]).
- b) **Nest Avoidance:** If the qualified biologist documents an active nest within the project site or surrounding areas, an appropriate buffer between the nest and active construction will be established. The buffer will be clearly marked and maintained until the young have fledged and are foraging independently. Prior to construction, the qualified biologist will conduct baseline monitoring of each nest to characterize "normal" bird behavior and establish a buffer distance, which allows the birds to exhibit normal behavior. The qualified biologist will monitor the nesting birds daily during construction activities and increase the buffer if birds show signs of unusual or distressed behavior (e.g., defensive flights and vocalizations, standing up from a brooding position, or flying away from the nest). If buffer establishment is not possible, the qualified biologist or construction foreman will have the authority to cease all construction work in the area until the young have fledged and the nest is no longer active.

Significance after Mitigation

Mitigation Measures 3.4-1 through 3.4-4 provide appropriate actions to avoid and minimize potential impacts on special-status and other protected species, including valley elderberry longhorn beetle, northwestern pond turtle, Swainson's hawk, white-tailed kite, and song sparrow. Implementation of these measures would reduce potential impacts to a **less-than-significant level with mitigation incorporated**.

OPERATION

Impact to be determined. This issue will be evaluated in detail in the Environmental Impact Report.

Lighting

The project site is in the urbanized Arden-Arcade area of Sacramento County where nighttime lighting from development throughout Carmichael, Arden, Rancho Cordova, and Sacramento creates existing skyglow. Nighttime security lighting is present at the project site in the form of building and parking lot lighting and at the single-family residences surrounding the project site to the north, east, and west. Overhead light standards for streetlights are present along American River Drive immediately north of the project site.

Four permanent stadium light poles, ranging from approximately 80 to 100 feet tall, would be installed to light the football field, replacing the current use of eight mobile diesel-powered LED light towers. In addition, six new 15-foot-tall light poles would be installed along the existing paved fire lane between the stadium and the main campus parking lot to provide for pedestrian safety. All proposed light fixtures would be directed downwards and designed to meet the strict guidelines set by the International Dark-Sky Association and, as such, would not contribute to glare or skyglow. In summary, the proposed stadium lights would not substantially increase lighting in the surrounding area from baseline conditions.

Increased lighting and noise disturbance from sports activities occurring during the evening hours could cause permanent and potentially significant impacts if such disturbance caused the abandonment of any nearby bat roosts during the maternity season (April 1 – August 31) or during the winter months (November 1 – February 28). If mother bats were to abandon a maternity roost occupied by nonvolant pups (pups that cannot fly), pup mortality would result. Arousal from hibernation and roost abandonment during the winter when food resources are scarce could result in mortality from decreased fitness or starvation. However, because surveys found no indications of roosting bats within the project improvements area and adjacent trees, no operational impacts to roosting bats are expected.

Artificial lighting can attract some insect prey species and thus some foraging bat species, while it can discourage foraging by shyer bat species trying to avoid predators. Increased lighting and noise disturbance from additional activities occurring on and around the existing stadium during evening hours, which are prime foraging hours for most bat species, could result in loss of foraging habitat. Some bat species (e.g., pallid bat) require foraging habitat very near their roosting habitat so loss of important foraging habitat may also result in abandonment of nearby roosts. However, surveys found no indications of roosting bats within the project disturbance area. In addition, abundant and generally superior foraging habitat exists in the American River Parkway just to the south of Raider Stadium. Therefore, the potential loss of the relatively small foraging habitat provided by the playing fields during the evening hours would result in a less-than-significant impact.

Given the small surface area of their vertical and horizontal structure, installed light poles would not have a significant impact on valley elderberry longhorn beetle, bat, or bird flight, including during migration. Installed light poles would not otherwise impact wildlife movement because the existing fences exclude other species from the high school campus. While increased lighting at the project site may cause the existing, active high school campus to be less attractive to nesting birds, ample more suitable nesting habitat is located in the surrounding neighborhoods and regional vicinity, particularly within riparian habitat to the south along the American River. Additionally, the proposed stadium lights would be used primarily during the winter months, outside the flight

season for valley elderberry longhorn beetle and the nesting period for birds. The proposed campus and stadium lighting would not adversely affect the behavior of wildlife, including nesting birds, adjacent to the project site because the lighting levels outside of the project site would be similar to the lighting levels under existing conditions.

Sufficient information is not available at this time to determine whether operational lighting impacts on all special-status or protected wildlife species would be less than significant. A lighting study will be conducted and included in the EIR. Therefore, this impact will be further evaluated and a determination of significance identified in the EIR.

Noise

The stadium's current diesel-powered light towers and PA system already generate noise during daytime and some evening activities. The proposed project would enable larger evening events, such as nighttime football games, as well as larger sporting events and daytime activities, such as graduation ceremonies, potentially increasing both the frequency and magnitude of noise-generating activities relative to existing conditions. Increased noise levels associated with proposed project improvements, like the modernized PA system, and increases in crowd size and traffic volume during higher-attendance events could disturb sensitive life stages of protected wildlife species, including nesting birds, nesting or overwintering northwestern pond turtles, and roosting bats. Dispersing or foraging individuals of protected wildlife species are mobile and would be expected to move to avoid disturbance, if necessary.

Sufficient information is not available at this time to determine whether operational noise impacts on all special-status or protected wildlife species would be less than significant. A quantitative noise analysis will be conducted and included in the EIR. Therefore, this impact will be further evaluated and a determination of significance identified in the EIR.

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?

The project site is located on the existing Rio Americano High School campus, and no riparian habitat or other sensitive natural community is present within the project site. Much of the project site is developed with existing stadium features or other campus facilities (e.g., storage sheds). The southern portion of the project site contains existing landscaping consisting of turf grass, trees, and shrubs. Numerous mature deciduous and evergreen trees line the southern boundary of the campus adjacent to riparian habitat within the American River Parkway along the north bank of the American River. These trees and the adjacent riparian habitat outside the project site would not be removed during project construction. Therefore, there would be **no impact** on riparian habitat or sensitive natural communities.

c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

The project site is located on the Rio Americano High School campus and consists of developed areas and landscaped vegetation without any aquatic features. Additionally, the USFWS National Wetland Inventory does not identify any wetlands or waters within the project site (USFWS 2025b). Project construction and operation

would not remove, fill, or hydrologically interrupt flows in the American River to the south of the project site. Therefore, there would be **no impact** on any federally protected wetlands.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Impact to be determined. This issue will be evaluated in detail in the Environmental Impact Report.

Project construction and implementation would not create any new barriers to movement in riparian and aquatic habitat corridors along the American River, and the proposed project site does not contain any native wildlife nursery sites. (See discussion of bat maternity roosting habitat in section 3.4.1(a) above.) Suitable riparian nesting habitat for birds and northwestern pond turtles is present adjacent to the project site's southern boundary.

Construction of the proposed project could disrupt nesting if it is occurring adjacent to the project site during construction. Any impacts associated with disrupting nesting northwestern pond turtles or birds would be mitigated for and reduced to a less-than significant level with mitigation incorporated, as discussed under a), above (see Mitigation Measures 3.4-1, 3.4-3, and 3.4-4).

Sufficient information is not available at this time to determine whether operational noise impacts on nesting northwestern pond turtles or birds would be less than significant. A quantitative noise analysis will be conducted and included in the EIR. Therefore, this impact will be further evaluated and a determination of significance identified in the EIR

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

Protected Trees

The project site is within the Arden-Arcade area of unincorporated Sacramento County. Native oak trees within the unincorporated area of Sacramento County are protected by the County Tree Preservation Ordinance and the County General Plan Conservation Element. No tree removal is planned as part of the project. However, construction of the new bleacher seating on the south side of the stadium may encroach into the root zone of four valley oak (*Quercus lobata*) trees lining the southern boundary of the Rio Americano High School campus along Raider Stadium. The following mitigation measure will be implemented, in addition to Mitigation Measure 3.4-1, to avoid and minimize potential construction impacts to protected trees:

Mitigation Measure 3.4-5

All native trees, as defined by a qualified biologist, in the work area with driplines that extend over the work area or with the potential to be impacted by improvements associated with the project, will be preserved and protected as follows:

- a) A circle with a radius measurement from the trunk of the tree to the tip of its longest limb will constitute the dripline protection area of the tree. Limbs will not be cut back to change the dripline.

- b) Fencing or a similar protective barrier will be installed 1 foot outside the dripline of native trees prior to initiating project construction. Construction activities within the dripline will be avoided to the extent possible. No construction equipment, materials, or vehicles will be operated or stockpiled within the dripline, and no trenching will occur within the dripline.
- c) Where soil disturbance is necessary within the dripline, a certified arborist will provide specifications for this work, including methods for root pruning, backfill specifications, and irrigation management guidelines.
- d) Drainage patterns will not be modified so that water collects within or is diverted across the dripline of native oaks.
- e) Tree pruning required for clearance during construction will be performed by a certified arborist or tree worker in accordance with the American National Standards Institute A300 pruning standards and the International Society of Arboriculture Tree Pruning Guidelines.
- f) Landscape materials will be kept at least 2 feet away from the base of the trunk of native oaks. The only plant species that will be planted within the dripline of native oaks will be tolerant of the trees' limited summer watering needs.
- g) If construction activities occur adjacent to native trees during June through September, native trees will be deeply watered using a soaker hose (or garden hose set to a trickle) that slowly applies water to the soil until water has penetrated at least 1 foot in depth. Sprinklers may be used to water deeply by watering until water begins to run off and waiting at least 1 or 2 hours before resuming watering. Trees will be deeply watered every 2 weeks, and watering will be suspended 2 weeks following rain events of 1 inch or more.

Significance after Mitigation

Mitigation Measures 3.4-1 and 3.4-5 provide appropriate actions to avoid and minimize potential impacts on native oak trees protected by the Sacramento County Tree Preservation Ordinance. Implementation of these measures would reduce potential impacts to a **less-than-significant level with mitigation incorporated**.

Swainson's Hawk Foraging Habitat

The Sacramento County Swainson's Hawk Ordinance (Sacramento County Code Chapter 16.130) established the Swainson's Hawk Mitigation Program to provide means of mitigation for loss of Swainson's hawk foraging habitat within 10 miles of a nest. However, the project site does not provide suitable foraging habitat for Swainson's hawk so project implementation would not result in permanent loss of suitable foraging habitat. In addition, the proposed project is within the approval authority of the San Juan USD and the County's Swainson's Hawk Ordinance does not apply to the proposed project. Therefore, there would be **no impact** related to conflict with the Sacramento County Swainson's Hawk Ordinance.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

The project site is in unincorporated Sacramento County, outside of the planning area of any adopted habitat conservation plan or natural community conservation plan. Therefore, there would be **no impact** related to consistency with any approved habitat conservation plans.

3.5 CULTURAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. Cultural Resources. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☐	☒
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of dedicated cemeteries?	☐	☒	☐	☐

3.5.1 DISCUSSION

a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?

No impact. The Rio Americano High School campus was evaluated for eligibility for listing in the National Register of Historic Places (NRHP) in 2009 and the California Register of Historical Resources (CRHR) in 2010 and did not meet any of the criteria and, therefore, is not a historical resource for the purposes of the California Environmental Quality Act (CEQA). Because the Rio Americano High School campus is not a historical resource, there would be no impact from project construction activities. This property has been evaluated in accordance with Section 15064.5(a)(2)-(3) of the CEQA Guidelines, using the criteria outlined in Section 5024.1 of the California Public Resources Code. There is **no impact**.

A records search conducted by the North Central Information Center (NCIC) of the California Historical Resources Information System (CHRIS) on November 13, 2025 (NCIC File No. SAC-25-187) indicated two previous cultural resources studies have been conducted within the project site (Losee 2004 and Losee 2009), and five studies had been conducted with 0.1-mile of the project site. The Rio Americano High School campus was recorded and evaluated on Department of Parks and Recreation (DPR) 523 series forms as part of Losee 2009 [S-10275] and assigned Primary number P-34-003906. It was the only previously recorded cultural resource identified within the project site. This 2009 recordation and evaluation found the Rio Americano High School campus ineligible for listing in the NRHP.

Of the five studies conducted with 0.1-mile of the project site, only one cultural resource was recorded, P-34-000508. This resource is a maintained earthen levee that is a component of the 23-mile-long Sacramento River Flood Control Plan (SRFCP) Levee Unit 118 Part 2. The levee system was evaluated as ineligible for listing for the NRHP in 2001.

The 2010 recordation of the Rio Americano High School campus was prepared on (DPR) 523 series forms by AECOM as part of the “Rio Americano High School Sports Facility Upgrades Draft Environmental Impact Report,” prepared for San Juan Unified School District in March 2010. This 2010 recordation and evaluation found the Rio Americano High School campus ineligible for listing in the CRHR.

As a result of two recordations and evaluations, Rio Americano High School campus is not a historical resource and therefore there would be **no impact** from project construction activities.

b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?

Less than Significant with Mitigation Incorporated. Previous studies and pedestrian surveys did not result in identification of archaeological resources in the proposed project site as defined by CEQA Guidelines Section 15064.5. Moreover, previous development and associated sub-surface excavation at the project site would further limit the likelihood of encountering buried cultural resources. Installation of the new stadium light poles would involve auguring approximately 3-foot diameter holes to approximately 16 feet below the ground surface, and installing precast pole bases into those holes. Total ground disturbance is estimated to be approximately 2,900 square feet of trenching along the pedestrian access pathway, and approximately 5,200 square feet of hardscape and 8,500 square feet of unpaved disturbance areas adjacent to the existing track for the installation of bleachers and lighting at the stadium. The earth disturbance at the project would be very minor, and as a result, additionally unlikely to encounter any archaeological resources. However, a possibility still exists that archaeological features could be discovered in the project site. The impact is considered **potentially significant**.

Mitigation Measure 3.5-1: Unanticipated Cultural Resources

In the event of an inadvertent discovery of cultural resources (excluding human remains) during construction, all work must halt within a 100-foot radius of the discovery. A qualified professional archaeologist, meeting the Secretary of the Interior's Professional Qualification Standards for prehistoric and historic archaeology, shall be retained by the District to evaluate the significance of the find. If it is determined by the qualified professional archaeologist due to the types of deposits discovered that a Native American monitor is required, the Guidelines for Monitors/Consultants of Native American Cultural, Religious, and Burial Sites as established by the Native American Heritage Commission shall be followed, and the monitor shall be retained at the District's expense.

1. Work cannot continue within the 100-foot radius of the discovery site until the archaeologist and/or tribal monitor conducts sufficient research and data collection to make a determination that the resource is either (1) not cultural in origin; or (2) not potentially eligible for listing on the National Register of Historic Places or California Register of Historical Resources.
2. If a potentially eligible resource is encountered, then the archaeologist and District staff shall arrange for either (1) total avoidance of the resource, if possible; or (2) test excavations or total data recovery as mitigation. The determination shall be documented in writing and submitted to the District for verification that the provisions of CEQA for managing unanticipated discoveries have been met.

Significance after Mitigation

Mitigation Measure 3.5-1 provides appropriate actions for inadvertent discovery of cultural resources (excluding human remains, which are addressed below). Implementation of Mitigation Measure 3.5-1 would reduce potential impacts on previously undiscovered cultural resources to a less-than-significant level because compliance with the above-listed procedures would address concerns about loss of, or substantial adverse changes to, significant cultural resources. If an inadvertent discovery of cultural materials is made during project-related construction

activities, disturbances in the area of the find must be halted and appropriate treatment and protection measures must be implemented, all in consultation with a professional archaeologist and/or Native American monitor. As a result, this impact would be **less than significant with mitigation**.

c) Disturb any human remains, including those interred outside of dedicated cemeteries?

Less than Significant with Mitigation Incorporated. There has been no indication or evidence that the area has been used for human burials in the recent or distant past. Therefore, human remains are unlikely to be encountered. Project construction would occur in previously disturbed areas of the existing campus. Ground disturbance would be very minor due to the nature of the proposed project. Human remains are unlikely to be encountered. However, in the unlikely event that human remains are discovered during subsurface activities, they could be inadvertently disturbed and damaged. Therefore, this impact would be **potentially significant**.

Mitigation Measure 3.5-2: Unanticipated Human Remains

Pursuant to Sections 5097.97 and 5097.98 of the State Public Resources Code, and Section 7050.5 of the State Health and Safety Code, if a human bone or bone of unknown origin is found during construction, all work is to stop, and the County Coroner and the District shall be immediately notified. If the remains are determined to be Native American, the coroner shall notify the Native American Heritage Commission within 24 hours, and the Native American Heritage Commission shall identify the person or persons it believes to be the most likely descendent from the deceased Native American. The most likely descendent may make recommendations to the landowner or the person responsible for the excavation work, for means of treating or disposition of, with appropriate dignity, the human remains and any associated grave goods.

Significance after Mitigation

Mitigation Measure 3.5-2 provides appropriate actions for inadvertent discovery of human remains. If remains are encountered, the above-described mitigation measure would require compliance with the procedures in the California Section 7050.5 of the Health and Safety Code and Public Resources Code 5097.98. Public Resources Code Section 5097.94 identifies the responsibilities for acting upon notification of a discovery of Native American human remains. These procedures are specifically designed to reduce the potential adverse effect of project implementation related to human remains by requiring that the human remains are treated in an appropriate and respectful manner and in accordance with applicable laws and regulations. As a result, this impact would be **less than significant with mitigation**.

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3.6 ENERGY

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VI. Energy. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☐	☒

3.6.1 DISCUSSION

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. The primary energy demands during construction are associated with equipment and vehicle fueling (e.g., gasoline, diesel fuel). Construction equipment and vehicles would be required to comply with federal, state, and local standards and regulations, including limitations on idling of heavy-duty equipment in accordance with California Code of Regulations Title 13, Section 2495, in addition to Sacramento Metropolitan Air Quality Management District (SMAQMD) standards that are aimed at reducing air pollution, including minimizing idling and ensuring proper maintenance, which would minimize the wasteful consumption of fuel during construction. Energy use during construction would be temporary and short-term (e.g., several weeks). In addition, the proposed project would be limited to three to four months and require very limited heavy-duty equipment, and does not include unusual characteristics that would necessitate the use of construction equipment that would be less energy-efficient than at a comparable construction site.

Energy consumption associated with long-term operations of the proposed project would result from the use of the proposed lighting and equipment associated with the proposed project stadium improvements, as well as the potential increase in vehicle trips to and from the project site due to increased use of the stadium. The proposed stadium lighting would replace existing mobile diesel-powered light towers with light-emitting diode (LED) electrical-powered light standards that would be more energy efficient and would reduce consumption of non-renewable energy resources, both by the elimination of diesel fuel consumption for lighting and due to the requirements for increased renewable power sources for electricity in accordance with California's Renewable Portfolio Standards.

Under existing conditions, vehicle travel occurs by students and other event attendees to attend events, such as football games and graduation ceremonies, off campus. Such activities would be accommodated at the Rio Americano High School with implementation of the proposed project. As such, some vehicle trips associated with operation of the proposed project would be a shift of existing trips within the region from alternative destinations to the Rio Americano High School campus. This may reduce travel distances for some trips, particularly for students that reside proximate to their home school of Rio Americano High School. The proposed project may also result in an increase in attendance at events, and therefore an increase in trip rates. However, such vehicle

travel by students to their home school would be more easily accommodated by alternative travel methods such as biking and walking, and would not be inefficient or wasteful.

Therefore, the proposed project would not adversely affect energy resources or energy conservation. The project would not result in unnecessary or wasteful use of energy. The project's energy demand would not constitute a wasteful, inefficient, or unnecessary use of energy. The impact would be **less than significant**.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

No Impact. The proposed project would not use land that was otherwise slated for renewable energy production and does not otherwise conflict with any state or local renewable energy plans. As described above, construction activities would use construction equipment and vehicles that are in compliance with federal and State standards for fuel efficiency and would comply with applicable regulations such as those related to idling. In addition, as described above, proposed construction and operational activities would not result in the inefficient or wasteful consumption of energy resources. The project would comply with applicable energy conservation standards and building regulations. Therefore, the project will not conflict with or obstruct a State or local plan for renewable energy or energy efficiency and there would be **no impact**.

3.7 GEOLOGY AND SOILS

ENVIRONMENTAL ISSUES		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VII.	Geology and Soils. Would the project:				
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i)	Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)	☐	☐	☒	☐
ii)	Strong seismic ground shaking?	☐	☐	☒	☐
iii)	Seismic-related ground failure, including liquefaction?	☐	☐	☐	☒
iv)	Landslides?	☐	☐	☐	☒
b)	Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☐	☒
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994, as updated), creating substantial direct or indirect risks to life or property?	☐	☐	☐	☒
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☐	☒
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒

3.7.1 DISCUSSION

- a) **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i) **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to California Geological Survey Special Publication 42.)**
 - ii) **Strong seismic ground shaking?**

Less-than-Significant Impact. The project site is located in the center of the Sacramento Valley; this area historically has not been seismically active (Jennings and Bryant 2010). The nearest active faults, including those that are classified under the Alquist-Priolo Earthquake Fault Zone Act, are approximately 40 miles west in the Coast Ranges and approximately 60 miles east near Lake Tahoe (Jennings and Bryant 2010, California Geological Survey 2022). The nearest known fault is the Bear Mountain Fault Zone, approximately 24 miles east of the project site, which is not classified as "active" (Jennings and Bryant 2010). The project site has a low potential for strong seismic ground shaking (California Geological Survey 2025). Therefore, hazards from surface fault rupture and strong seismic ground shaking are considered **less than significant**.

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

No Impact. The depth to groundwater at the project site is relatively deep—approximately 80 to 90 feet below the ground surface (California Department of Water Resources [DWR] 2024)—and, given the low potential for strong seismic ground shaking, the liquefaction potential is also low. Thus, there would be **no impact**.

- iv) **Landslides?**

No Impact. The project site is flat and is not adjacent to any areas of steep slopes. Thus, there is no potential for seismically-induced landslides. There would be **no impact**.

- b) **Result in substantial soil erosion or the loss of topsoil?**

Less-than-Significant Impact. A review of U.S. Natural Resources Conservation Service (NRCS) soil survey data indicates that the soil at the project site is composed of the Rossmoor-Urban Land Complex, 0 to 2 percent slopes. This soil type is rated with a moderate wind erosion hazard and low water erosion hazard potential (NRCS 2024). Project-related construction would involve minor excavating and backfilling to install four approximately 3-foot diameter concrete foundations for the proposed light standards at the stadium and six smaller concrete foundations for the light standards along the sidewalk next to the fire lane, along with minor trenching for electrical. Due to the small size of the soil area that would be disturbed, a Storm Water Pollution Prevention Plan (SWPPP) under the National Pollutant Discharge Elimination System (NPDES) permit program would not be required. The extent of soil disturbance during construction activities would be minor. The San Juan Unified School District's construction contractor would be required to implement Best Management Practices (BMPs) designed to control and sediment transport at the project site. Therefore, the proposed project would not result in substantial soil erosion, and this impact would be **less than significant**.

- c) **Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?**

No Impact. The project site is flat (thus, there are no landslide hazards), and the site does not include open creek banks where lateral spreading could be a hazard. The project site is composed of the Rossmoor-Urban Land Complex, 0 to 2 percent slopes soil type, which is composed of fine sandy loam. There are no unstable soil conditions such as a shallow depth to clay layer or shallow depth to groundwater that would result in subsidence, liquefaction, or collapse (DWR 2024, NRCS 2024). Thus, there would be **no impact** related to unstable soil.

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

No Impact. The soil at the project site is composed of Rossmoor-Urban Land Complex, 0 to 2 percent slopes. This soil type is not expansive (NRCS 2024). Thus, there would be **no impact** related to expansive soil.

- e) **Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?**

No Impact. The proposed project does not require or include installation of new permanent restroom facilities. Temporary, portable restrooms would be provided for construction workers during the construction phase. Thus, there would be **no impact** related to soil suitability for septic tanks or alternative wastewater disposal systems.

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

Unique Geologic Features

No Impact. A unique geologic feature consists of a major natural element that stands out in the landscape, such as a large and scenic river, gorge, waterfall, volcanic cinder cone, lava field, or glacier. There are no unique geologic features at the project site, which has been developed and used as a school since 1963. The proposed project would have no effect on the geologic features associated with the nearby American River. (Potential aesthetics impacts on the adjacent American River Parkway will be evaluated in the Environmental Impact Report.) Thus, there would be **no impact** from destruction of a unique geologic feature.

Unique Paleontological Resources

No Impact. Based on a review of geologic mapping prepared by Gutierrez (2011), the project site is composed of Holocene-age (11,700 years Before Present [B.P.] to Present Day) Alluvium. The alluvial deposits are likely ancestral channel deposits of the nearby American River. Holocene-age deposits contain only the remains of extant, modern taxa (if any resources are present), which are not considered "unique" paleontological resources. Thus, the Holocene Alluvium at the project site is not paleontologically sensitive. Therefore, earthmoving activities associated with the proposed project would not result in accidental damage to or destruction of unique paleontological resources, and there would be **no impact**.

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3.8 GREENHOUSE GAS EMISSIONS

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
VIII.Greenhouse Gas Emissions. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

3.8.1 DISCUSSION

- a) **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**
- b) **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Less-than-Significant Impact, Less-than-Cumulatively-Considerable Impact. Certain gases in Earth’s atmosphere, classified as greenhouse gases (GHGs), play a critical role in determining the earth’s surface temperature. Solar radiation enters the earth’s atmosphere from space. A portion of the radiation is absorbed by Earth’s surface, and a smaller portion of this radiation is reflected toward space through the atmosphere. Infrared radiation is selectively absorbed by GHGs. As a result, infrared radiation released from Earth that otherwise would have escaped back into space is instead “trapped,” resulting in a warming of the atmosphere. This phenomenon, known as the “greenhouse effect,” is responsible for maintaining a habitable climate on Earth.

Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. A scientific consensus confirms that climate change is already affecting California. As noted in the Sacramento Valley Regional Report of the California’s Fourth Climate Change Assessment (Houlton and Lund 2018), climate change is expected to make the Sacramento region hotter, drier, and increasingly prone to extremes like megadroughts, flooding, and large wildfires. These changing conditions are likely to affect water and energy availability, agricultural systems, plants and wildlife, public health, housing, and quality of life.

Global Warming Potential (GWP) is a concept developed to compare the ability of each GHG to trap heat in the atmosphere relative to another gas. GWP is based on several factors, including the relative effectiveness of a gas to absorb infrared radiation and the length of time the gas remains in the atmosphere (its “atmospheric lifetime”). The GWP of each gas is measured relative to carbon dioxide (CO₂). Therefore, CO₂ has a GWP of 1. GHGs with lower emissions rates than CO₂ may still contribute to climate change because they are more effective at absorbing outgoing infrared radiation than CO₂ (i.e., high GWP). For example, SF₆, while comprising a relatively small fraction of the total GHGs emitted annually worldwide, has a GWP of 22,800, meaning that 1 ton of SF₆ has the same contribution to the greenhouse effect as approximately 22,800 tons of CO₂. The concept of CO₂

equivalence (CO₂e) is used to account for the different GWP potentials of GHGs. GHG emissions are typically measured in terms of pounds or tons of CO₂e and are often expressed in MT CO₂e.

The proposed project will not, by itself, contribute significantly to climate change; however, cumulative emissions from many projects and plans all contribute to global GHG concentrations and the climate system. Unlike criteria air pollutants and toxic air contaminants that tend to have more localized or regional impacts, GHG emissions are pollutants of a global concern because of their relatively longer atmospheric lifetimes compared to air pollutant emissions and effect on the climate globally. Therefore, this section considers the project's cumulative contribution to the significant cumulative impact of climate change.

STATE LEGISLATIVE FRAMEWORK

The California Air Resources Board (CARB) has adopted statewide legislation addressing various aspects of climate change and GHG emissions mitigation. Much of this establishes a broad framework for the State's long-term GHG reduction and climate change adaptation program. Of particular importance is Assembly Bill (AB) 32, which established a statewide goal to reduce GHG emissions back to 1990 levels by 2020, which California achieved as a state, and Senate Bill (SB) 375 which supports AB 32 through coordinated transportation and land use planning with the goal of more sustainable communities. SB 32 extends the State's GHG policies and establishes a near-term GHG reduction goal of 40 percent below 1990 emissions levels by 2030. For the post-2030 period, Executive Order (EO) B-55-18, which was codified by AB 1279 in 2022, established a new statewide goal to achieve carbon neutrality as soon as possible, and no later than 2045, and achieve and maintain net negative emissions thereafter. AB 1279 also requires that statewide anthropogenic GHG emissions are reduced to at least 85 percent below 1990 levels by 2045. EO S-03-05 identifies a longer-term goal of reduced GHG emissions by 80 percent below 1990 levels by 2050. CARB has adopted the Climate Change Scoping Plan, which contains the main strategies California will implement to achieve the required GHG reductions required by AB 32, SB 32, and AB 1279 (CARB 2022).

LOCAL AIR DISTRICT RECOMMENDATIONS FOR SIGNIFICANCE DETERMINATIONS

The project site is located within unincorporated Sacramento County in an area regulated by the Sacramento Metropolitan Air Quality Management District (SMAQMD). On April 23, 2020, the SMAQMD Board of Directors adopted the Update to the Recommended GHG Emissions Thresholds of Significance (SMAQMD 2020a), which established thresholds of significance for GHG emissions designed to analyze a project's compliance with applicable state laws, including AB 32, SB 32, and EO B-55-18 (SMAQMD 2020b). In developing the thresholds, the SMAQMD developed the thresholds for Sacramento County based on determining Sacramento County's share of statewide 2030 GHG emissions by sector, determining the share of Sacramento County 2030 emissions from existing development versus new development, allocating 2030 GHG emissions from new development among land uses and place types to set numeric thresholds, and setting best management practices by land use and place types that achieve those numeric thresholds. Specifically, the SMAQMD adopted a mass emissions based threshold for the construction phase of all project types of 1,100 MT CO₂e per year (SMAQMD 2021).

For operational emissions, the SMAQMD has developed an operational screening table, which shows sizes of development projects at which 1,100 MT CO₂e would not be exceeded, when including implementation of Tier 1

Best Management Practices¹ which require that projects be designed and constructed without natural gas infrastructure (BMP 1) and that projects meet the current California Green Building Standards (CALGreen) Tier 2 standards and that all electric vehicle (EV) capable spaces shall instead be EV ready (BMP 2). Since these thresholds were last updated by SMAQMD, CARB has finalized the 2022 Climate Change Scoping Plan, which establishes the State’s framework for reaching the target to achieve carbon neutrality no later than 2045 established in EO B-55-18 and later promulgated into law through AB 1279. Carbon neutrality is not a standard to be achieved on an individual project basis, but through the implementation of best available technology, increasingly stringent regulations to reduce emissions from various sources, state and regional plans to reduce vehicle miles traveled (VMT) and increase carbon-free vehicle use, and carbon capture and sequestration actions focused on the natural and working lands sector, as identified in the 2022 Scoping Plan. Evaluating consistency with the State’s emissions reduction targets shows alignment with the State’s approach to reduce the generation of GHG emissions from existing and anticipated future sources, a key component of the 2022 Scoping Plan (CARB 2022b).

As discussed above, SMAQMD considered consistency with the goal of carbon neutrality by 2045 when developing the District’s GHG thresholds. Since the proposed project includes the installation of lighting, and operational activities would be limited to electricity consumption and intermittent mobile trips related to ongoing use of the existing stadium, Tier 1 Best Management Practices would not be applicable. Therefore, determining whether the proposed project may result in a cumulatively considerable contribution to the cumulative impact of climate change is based on SMAQMD’s threshold of 1,100 MT CO₂e per year for construction-related and operational GHG emissions.

APPROACH TO ANALYSIS AND SIGNIFICANCE DETERMINATION

Considering that GHG emissions impact analysis and significance determination are established by the State legislative framework, the analysis in this section answers the two checklist questions in CEQA Guidelines Appendix G in a single impact assessment. Whether or not the proposed project would generate GHG emissions that would result in a substantial contribution to the significant impact of climate change or conflict with an applicable plan, policy, or regulation adopted for the purposes of reduction GHG emissions depends on whether the proposed project would comply with the SMAQMD thresholds of significance.

PROJECT ANALYSIS

Short-term construction activities of the proposed project would generate GHG emissions associated with exhaust from the very limited use of off-road equipment and on-road vehicles. Construction-related GHG emissions generation would cease following construction of the proposed project. Construction GHG emissions were using the same methods and assumptions as those described in Section 3.3, “Air Quality,” of this Initial Study. In addition to criteria air pollutants, CalEEMod also estimates GHG emissions associated with construction and operational activities. Total construction GHG emissions are presented in Table 3.8-1 below.

See Appendix A for detailed emissions inputs and assumptions.

¹ The current SMAQMD de minimis threshold is 1,100 MT CO₂e per year. By complying with Best Management Practices 1 and 2 (removing natural gas, EV-ready), SMAQMD suggests that small projects would reduce emissions to be consistent with State goals (SMAQMD 2020a).

Operational activities would generate GHG emissions associated with mobile, energy, and refrigerant sources. Mobile source GHG emissions would be generated by the intermittent increase in vehicle trips to the stadium during operations. Energy source GHG emissions would be indirect² emissions associated with electricity consumption to power the proposed lights. The press box is assumed to have an air conditioning unit, which would generate minimal GHG emissions from the use of refrigerants in such a unit. Operational mobile source emissions were estimated in CalEEMod using the same methods and inputs as those described in Section 3.3, “Air Quality”, including the use of a maximum event and potential peak vehicle trips to estimate annual vehicle trips and VMT. Energy source emissions were estimated based on the estimated annual electricity consumption, along with the CalEEMod default GHG intensity factors for the Sacramento Metropolitan Utility District power mix. As a reasonable and somewhat conservative approach to the most applicable land use in CalEEMod to represent proposed project improvements, electricity consumption associated with the proposed project was estimated based on CalEEMod defaults for a parking lot³ equivalent in size to the estimated disturbance areas for the bleachers, pads for the stadium lights, and the egress pathway where additional lighting would be installed. Refrigerant consumption was estimated based on CalEEMod defaults for the proposed press box⁴.

Under existing conditions, vehicle travel occurs by students and other event attendees to attend events, such as football games and graduation ceremonies, off campus. Such activities would be accommodated at the Rio Americano High School with implementation of the proposed project. As such, some vehicle trips associated with operation of the proposed project would be a shift of existing trips within the region from alternative destinations to the Rio Americano High School campus. This may reduce travel distances for some trips, particularly for students that reside proximate to their home school of Rio Americano High School. The proposed project may also result in an increase in attendance at events, and therefore an increase in trip rates. However, such vehicle travel by students to their home school could be more easily accommodated by alternative travel methods such as biking and walking. Nonetheless, the operational mobile source GHG emissions account for all VMT from all anticipated trips to and from the project site for events that would be accommodated as a result of the proposed project stadium improvements, without accounting for the emissions already generated regionally by trips to and from similar events currently hosted at alternative locations. Additionally, with implementation of the proposed project, use of the existing diesel-powered lights and associated GHG emissions from fuel combustion associated with such use would cease. Therefore, to provide a conservative analysis, the operational GHG emissions from the proposed project, without accounting for elimination of existing mobile and stationary source emissions, are compared to the SMAQMD significance thresholds, as shown in Table 3.8-1 below.

² Indirect emissions are those emissions that occur at a different time or location from the point of consumption or use. For example, electricity-related GHG emissions are indirect emission because as a consumer uses electricity, the fuel combustion and emissions associated with creating that electricity likely occurred off-site or at a different time.

³ The project area for the proposed bleachers, pads for stadium lights and egress pathway were modeled using the CalEEMod land use type “User Defined Recreational” which does not have an associated default electricity consumption. The default electricity consumption for a parking lot equivalent in size to these proposed project components was used.

⁴ The proposed press box was modeled using the CalEEMod land use type for a High School.

Table 3.8-1. Proposed Project Construction-Related and Operational GHG Emissions

Source	GHG Emissions (MT CO ₂ e per year)
Total Construction Emissions	102
<i>Operational Mobile</i>	180
<i>Operational Energy</i>	2
<i>Operational Refrigerants</i>	7.8E-05
Total Annual Operational Emissions	182
SMAQMD Significance Threshold	1,100
Emissions Exceed SMAQMD Threshold?	No

Notes: CO₂e = carbon dioxide equivalents; GHG = greenhouse gas; MT = metric tons; SMAQMD = Sacramento Metropolitan Air Quality Management District
 Modeled by AECOM in 2025.

As shown in Table 3.8-1, total construction-related and operational emissions would be well below the SMAQMD-recommended bright-line thresholds for construction and operational activities. The SMAQMD quantitative thresholds of significance for GHGs were developed with the intent to ensure at least 90 percent of new GHG emissions would be reviewed and assessed for mitigation, thereby contributing to GHG emissions reductions goals set forth by AB 32 and SB 32. Additionally, the proposed project operations would not include natural gas infrastructure, consistent with SMAQMD recommended BMP 1 and SMAQMD recommended BMP 2 for EV infrastructure is not applicable as the proposed project supports ongoing use of the existing stadium and does not propose new or expanded school facilities or parking. The project is a lighting improvements project for an existing school stadium that primarily serves existing local school needs and would result in GHG emissions substantially below the SMAQMD bright-line threshold of 1,100 MT CO₂e per year.

As described above, operational mobile source emissions are based on conservative assumptions for the occurrence of maximum events with peak attendance throughout the year, and do not account for the shift in existing VMT. In reality, some events may have lower attendance and operational mobile GHG emissions would be reduced compared to those shown in Table 3.8-1. Additionally, GHG emissions associated with the project's electricity consumption would be reduced over time with implementation of the California Renewable Portfolio Standards, which requires electricity retailers to meet specific goals of providing their energy supply from renewable sources.

Therefore, because project construction and operational GHG emissions would not exceed the SMAQMD GHG thresholds of significance, the proposed project would not generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment or conflict with an applicable plan, policy, or regulation adopted for the purposes of reducing the emissions of GHGs. This impact is **less than cumulatively considerable (less than significant)**.

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3.9 HAZARDS AND HAZARDOUS MATERIALS

ENVIRONMENTAL ISSUES		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
IX. Hazards and Hazardous Materials. Would the project:					
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☒	☐
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☐	☒

3.9.1 DISCUSSION

- a) **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**
- b) **Create a significant hazard to the public or the environment through reasonably foreseeable upset and/or accident conditions involving the release of hazardous materials into the environment?**

Less-than-Significant Impact. Project-related construction would involve the use of construction equipment and associated small quantities of fuels and oils, which are hazardous materials. These materials are not acutely hazardous. Statutory requirements governing hazardous waste transportation in California are contained in the California Health and Safety Code, Division 20, Chapter 6.5, Articles 6.5, 6.6, and 13. Hazardous waste transporters must have a valid registration permit issued by California Department of Toxic Substances Control (DTSC). In addition, hazardous waste transporters must comply with a variety of other State and federal regulations, including the California Vehicle Code (California Code of Regulations [CCR] Title 13); California State Fire Marshal Regulations (CCR Title 19); U.S. Department of Transportation regulations (Title 49 Code of

Federal Regulations [CFR]); and U.S. Environmental Protection Agency (EPA) (Title 40 CFR). Handlers of hazardous materials (including construction contractors) are required to follow the manufacturer's labelling instructions for use and disposal. Construction worker health and safety regulations would be implemented in accordance with applicable federal and state standards, including the California Division of Occupational Safety and Health. Fuel and oil for construction equipment would not be stored at the project site or in the staging area; instead, they would be provided by service trucks obtained through the construction contractor. There is no component of the proposed project that would result in an unusually high level of exposure to hazardous materials, and no acutely hazardous materials would be used or stored at the project site or the construction staging area. Furthermore, the use and disposal of hazardous materials is heavily regulated at the federal and state level by EPA and DTSC, as outlined in CCR Title 22. Thus, this impact would be **less than significant**.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less-than-Significant Impact. The proposed project would be implemented at the existing Rio Americano High School campus. The Rio Americano High School's outdoor sports fields are immediately adjacent to the project site to the north. Minor amounts of fuel and oil for construction equipment would be used during the project's construction process. However, all construction materials and equipment would be staged and stored on the project site in paved areas to protect water quality in the unlikely event of an accidental spill. The construction staging area would be surrounded by temporary exclusionary fencing to protect students and members of the public. The fuel and oil provided by service trucks for the construction equipment are not acutely hazardous. Thus, impacts from the handling of hazardous materials within 0.25 mile of a school would be **less than significant**. (Analysis related to hazardous air pollutant emissions is provided in Section 3.3 of this Initial Study.)

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code §65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. AECOM conducted a search of publicly available databases maintained under Public Resources Code Section 65962.5 (i.e., the "Cortese List") to determine whether any known hazardous materials are present either in or within 0.25 mile of the project site. These searches included the EnviroStor database maintained by the California Department of Toxic Substances Control (DTSC 2025), and the GeoTracker database maintained by the State Water Resources Control Board (SWRCB 2025).

The project site is not on the Cortese List, and there are no Cortese-listed hazardous materials sites within approximately 1 mile of the project site (DTSC 2025, SWRCB 2025).

AECOM also conducted a search of the U.S. Environmental Protection Agency's National Priorities List (Superfund) database; there are no Superfund sites within 2.4 miles of the project site (USEPA 2024).

Because the project site is not on the Cortese List, and there are no other nearby hazardous materials sites that would represent a hazard to the public or the environment from project construction or operation, there would be **no impact**.

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

Less-than-Significant Impact. Mather Airport is approximately 2.4 miles to the southeast. The project site is at the extreme northwestern edge of the Airport Influence Area, within Review Area 2 as established by the Mather Airport Land Use Compatibility Plan (Environmental Science Associates 2022). However, the project site is not within (and is approximately 1 mile north of) the CFR Title 14 Part 77 imaginary airspace surfaces and overflight notification area, and the 10,000-foot Airport Operations Area buffer wildlife hazards analysis area. The project site is also not within any of the airport Safety Zones (Environmental Science Associates 2022).

Furthermore, as detailed in Chapter 2, “Project Description,” the project’s lighting design and engineering is specifically being prepared to incorporate known technology implemented recently on other school stadium lighting projects and proven to meet the strict guidelines set by the International Dark-Sky Association. As such, the proposed project lighting would not contribute to glare or skyglow. Therefore, the proposed stadium lighting would not result in hazardous glare for aircraft pilots en route to Mather Airport. For the reasons described above, the proposed project would not result in a safety hazard for aircraft or for people residing or working in the project area, and this impact is considered **less than significant**. (Noise hazards will be analyzed in the EIR.)

- f) **Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?**

Construction

No Impact. The project site is accessible by emergency vehicles using the surrounding roadway network and the stadium areas is accessible from the north via a paved fire lane that connects to American River Drive through the main campus parking area. The limited amount of project construction would result in only minor increases in short-term, temporary, construction-related traffic on local roadways including American River Drive, which would not impair emergency access vehicles or emergency evacuation routes. The existing parent drop off, bus loading areas, and the main school parking areas are located north of the project site near American River Drive, and would not be affected by project-related construction, which is proposed during the summer months when school classes would not be in session. All construction materials and equipment would be staged and stored on the project site in paved areas. No construction-related roadway lane closures or detours on surrounding roadways would be necessary. Therefore, project-related construction activities would not substantially impair or physically interfere with an adopted emergency response plan or emergency evacuation plan, and there would be **no impact**.

Operation

Less-than-Significant Impact. The project site is in the Arden-Arcade area of unincorporated Sacramento County. Any necessary emergency evacuations would be coordinated by Sacramento County officials through the County Office of Emergency Services (OES). The following information is excerpted from the *Sacramento County Evacuation Plan* (Sacramento County OES 2021). The decision to evacuate, if necessary, would be made based on the information gathered, and communities would be evacuated as the need arises, on a case-by-case basis. The decision to evacuate would depend entirely upon the nature, scope, and severity of the emergency; the number of people affected; and what actions would be necessary to protect the public. Evacuation operations in the field would be managed and conducted by the law enforcement agency with jurisdiction. Key functions

supporting the law enforcement efforts include the Sheriff's Department, County Department of Transportation, Regional Transit, public and private transportation providers, fire departments, County Department of Human Assistance, and County Department of Health and Human Services (Sacramento County OES 2021).

The Sacramento County OES uses Sacramento Alert, a web-based application that enables authorized County public safety officials to disseminate public safety information rapidly and efficiently to the residents of Sacramento, including the project area. Sacramento Alert utilizes "reverse 911" data and technology, as well as contact information provided by citizens through a Citizen Opt-In portal (Sacramento County OES 2025).

The primary mode of transportation that would be used during an evacuation would be the evacuees' private transportation resources. Law enforcement would be the primary agency for managing the movement of people during an evacuation, along with the Sacramento County Department of Transportation and other departments or agencies in supporting roles such as the Sacramento County Medical Health Operational Area Coordinator for medical transport resources. Primary evacuation routes in Sacramento County consist of the major interstates, highways, and prime arterial roadways. Traffic conditions are monitored along evacuation routes, and operational adjustments would be made by County officials as necessary during an evacuation to maximize throughput. During an evacuation, County Department of Transportation traffic engineers, along with California Department of Transportation, would be able to quickly calculate traffic flow capacity and decide which of the available traffic routes should be used to move people in the correct directions and to adjust evacuation routes based on real-time conditions. Additionally, known traffic conditions may be communicated to Internet applications such as WAZE and Google Crisis Maps to better inform the public in real time regarding available traffic conditions. In the immediate project vicinity, the public would use American River Drive (a collector roadway) and Fair Oaks Boulevard (an arterial roadway), for east-west movement. These streets connect with Watt Avenue, which provides access to U.S. Highway 50 to the south. Alternatively, American River Drive and Fair Oaks Boulevard also provide access to a full grid of other north-south and east-west collector and arterial roadways that also serve as evacuation routes, depending on the location of the emergency (Sacramento County OES 2021).

Attendance at Raider Stadium for larger sporting events would increase from the existing 288-person maximum capacity to a 2,500-person maximum capacity. However, the large Rio Americano High School athletic sporting events that generate the 2,500-person attendance are already occurring off site at other nearby venues, and thus the proposed project would result in a shift in location (from off-site to on-site) rather than an overall increase in attendance. In the unlikely event that an evacuation from unforeseen circumstances were to be necessary during an in-process nighttime sporting event at Raider Stadium with the proposed increased stadium capacity of 2,500 people, the Sacramento County Sheriff's Office North Central District and school officials would coordinate evacuation from the Rio Americano High School campus onto American River Drive, in combination with evacuation of any other necessary areas. American River Drive is a two-lane divided highway with a center turn lane that provides east-west access onto a grid of many other north-south and east-west roadways. American River Drive connects directly to Watt Avenue approximately 1.5 miles west of the high school. Traffic from any necessary evacuation would be dispersed throughout this grid network as shown in the *Sacramento County Evacuation Plan* (Sacramento County OES 2021). Furthermore, as discussed in criterion (g) below, the project site is not situated within or near a designated fire hazard zone of any kind (California Department of Forestry and Fire Protection 2025). In the event of an imminent threat of a flood from a levee breach along the American River, school officials would be monitoring the river levels and would cancel classes and afternoon and nighttime sports practice and events ahead of time. This would allow students to stay home with their families, and be prepared for or implement evacuation.

For the reasons explained above, in the unlikely event an evacuation were necessary during a nighttime sporting event at the Rio Americano High School stadium, such traffic would not substantially impair implementation of an emergency evacuation plan, and this impact would be **less than significant**.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact. The project site is located in an urbanized area of Sacramento County (Arden-Arcade) and is not situated within or near a State Responsibility Area or a very high fire hazard severity zone. Rio Americano High School and the surrounding area are within a Local Responsibility Area, and are not designated as very high or moderate fire hazard severity zones. There are no very high or moderate fire hazard severity zones delineated within the urbanized area of Sacramento, including the Arden-Arcade area and the project site (California Department of Forestry and Fire Protection 2025). The project site consists of the existing Raider Stadium and surrounding paved areas, along with the paved fire land west of the stadium. The project site is surrounded by single-family residential development to the east, west, and north, and the American River Parkway to the south. In the project vicinity, the American River Parkway consists primarily of grassland, with scattered trees. Rio Americano High School is currently served by the Sacramento Metropolitan Fire District, and those services would continue in the future. Installation and operation of the proposed lighting, bleachers, and press box at the existing developed project site would not exacerbate wildland fire risks. Thus, there would be **no impact**. (See also Section 3.20, “Wildfire,” for additional analyses related to wildland fire hazards, which were determined to result in no impact.)

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3.10 HYDROLOGY AND WATER QUALITY

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

3.10.1 ENVIRONMENTAL SETTING

SURFACE WATER RESOURCES AND STORMWATER DRAINAGE

The proposed project improvements would occur within the existing Raider Stadium area and pedestrian access pathway west of the stadium to the existing main campus paved parking area. The project site is flat and the area affected by project improvements is surrounded by paved hardcourt play fields and school buildings to the west, turf grass outdoor ball fields to the north, single-family residential development to the east, and the American River Parkway to the south. The project site is approximately 450 feet from the American River, separated from Parkway and the river by the elevated embankment of the north bank American River flood control levee.

The high school campus has an existing on-site stormwater drainage system that discharges north to a drainage main line in American River Drive, which is owned and operated by Sacramento County. This drainage main line flows west and discharges south into the American River from an outfall that is immediately southeast of 3638 American River Drive (Sacramento County 2025).

SURFACE WATER QUALITY

As required by the Porter-Cologne Water Quality Control Act, the Central Valley Regional Water Quality Control Board (Central Valley RWQCB) has designated beneficial uses for water body segments in its jurisdiction, along with water quality criteria necessary to protect these uses, as contained in the *Sacramento and San Joaquin River Basin Plan* (Central Valley RWQCB 2019). In addition, the federal Clean Water Act (CWA) Section 303(d) requires states to identify waters where the permit standards, any other enforceable limits, or adopted water quality standards are still unattained. The CWA also requires states to develop total maximum daily loads (TMDLs) to improve the water quality of impaired water bodies. TMDLs are the quantities of pollutants that can be safely assimilated by a water body without violating water quality standards. TMDLs are developed for impaired water bodies to maintain beneficial uses as designated in the applicable Basin Plan, achieve water quality objectives, and reduce the potential for future water quality degradation. National Pollutant Discharge Elimination System (NPDES) permits for water discharges must take into account the pollutants for which a water body is listed as impaired.

The lower American River (from Nimbus Dam west to the confluence with the Sacramento River) is included in the State Water Resources Control Board's (SWRCB) 303(d) list for the following pollutants: water temperature, benzo[b]fluoranthene, chrysene, polychlorinated biphenyls, toxicity, pyrethroids, bifenthrin, cyfluthrin, cyhalothrin (lambda), indicator bacteria, and mercury (SWRCB 2024). None of these pollutants currently have adopted TMDLs for the lower American River.

FLOODING

The project site and the surrounding developed areas to the west, north, and east are within an area classified by the Federal Emergency Management Agency as Zone X, which is an "Area With Reduced Flood Risk Due to Levee" (FEMA 2012). This classification means that the project site and the surrounding developed area behind the north bank American River levee are not within a 100-year flood zone.

However, the project site and the surrounding developed areas to the west, north, and east are within a 200-year floodplain and therefore are subject the Urban Level of Flood Protection requirements contained in the Central Valley Flood Protection Plan (DWR 2024).

GROUNDWATER

The project site is situated within the Sacramento Valley Groundwater Basin, North American Subbasin. The North American Subbasin encompasses approximately 342,000 acres in Sutter, Placer, and Sacramento counties and is bounded by the American, Bear, Feather, and Sacramento Rivers. As required by the Sustainable Groundwater Management Act, a Groundwater Sustainability Plan for the North American Subbasin has been prepared to manage groundwater and achieve sustainability goals (GEI Consultants, Inc. 2021). As discussed in the Groundwater Sustainability Plan, for more than two decades, municipal and industrial water purveyors in the North American Subbasin have expanded conjunctive use operations that halted past overdraft conditions and have resulted in generally increasing groundwater levels in the urban area. As a result, the North American Subbasin is not in a state of overdraft (GEI Consultants 2021).

3.10.2 DISCUSSION

a) **Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?**

Less-than-Significant Impact. The Rio Americano High School campus has an existing stormwater drainage system, which includes the project site, that would not be altered as a result of proposed project operations and would continue to be used; thus, the proposed project would not result in operational water quality impacts. Therefore, this impact analysis focuses on the potential for construction-related impacts.

Although the project site is flat, the potential exists for erosion to occur during construction activities, particularly if construction occurs during the rainy season. Project-related earthmoving activities could result in the transport of sediment into local drainages, thereby increasing turbidity, degrading water quality, and resulting in siltation to local waterways. Because of the elevated levee berm between the project site and the American River, there is no direct pathway for sediment transport and resulting adverse water quality effects from the project site to the river. However, sediment could be washed into the on-site stormwater drainage system and carried off site, where it would ultimately be discharged into the American River through drainage pipelines further west.

Groundwater quality could be affected either by direct contact during construction-related earthmoving activities, or by indirect contact as a result of percolation of stormwater. However, since the depth to groundwater in the project area ranges from approximately 80–90 feet below the ground surface (DWR 2024), and project-related excavation would be limited to a depth of approximately 16 feet below the ground surface, there is no potential for project-related excavation to encounter groundwater.

The County’s Stormwater Management and Discharge Control Ordinance (Sacramento County Municipal Code Chapter 15.12) prohibits the discharge of unauthorized non-stormwater to the County’s stormwater conveyance system and local creeks. It applies to all private and public projects in the County, regardless of size or land use type. Section 15.12.322 requires that Best Management Practices (BMPs) be implemented to control the discharge of pollutants to the maximum extent practicable, and to eliminate non-stormwater discharges that are not in compliance with a National Pollutant Discharge and Elimination System (NPDES) permit.

Project-related construction would involve minor excavating and backfilling to install four small concrete foundations for the proposed light standards at the stadium and six smaller concrete foundations for the light standard along the pedestrian access pathway, along with minor trenching for electrical, as well as minor ground disturbance for the installation of bleachers. Due to the small size of the soil area that would be disturbed, a Storm Water Pollution Prevention Plan (SWPPP) under the NPDES permit program would not be required. The extent of soil disturbance during construction activities would be minor. As discussed above, the San Juan Unified School District’s construction contractor would be required to implement BMPs designed to control and sediment transport at the project site per County Municipal Code Section 15.12.322. Therefore, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality, and this impact would be **less than significant**.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that there the project may impede sustainable groundwater management of the basin?

Less-than-Significant Impact. Groundwater would not be required for the proposed project. Project-related construction activities would involve excavating a total of ten, 2- to 3-foot-diameter holes to a depth of approximately 16 feet or less, which would be backfilled with concrete for the poles that would support the high mast light standards. The existing locations where the holes would be drilled are already covered with hard surfacing associated with the stadium, and with pavement along the sidewalk next to the fire lane, which is impervious. The new bleacher seating would be constructed using an open metal frame that would allow rainwater to flow through. The areas where bleacher seating and the press box would be installed are primarily comprised of existing pavement, which is impervious, and includes small areas of new proposed foundational pavement adjacent to the existing paved areas. In total, the proposed project would result in up to approximately 0.2 acres of new impervious surfaces. This change, as a result of the proposed project, would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project would impede sustainable groundwater management of the basin, and this impact would be **less than significant**.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i) Result in substantial erosion or siltation on- or off-site?

Less-than-Significant Impact. The project site is flat, and the Rio Americano High School campus has an existing stormwater drainage system that would continue to be used. The proposed project would not alter the existing drainage patterns and would add minimal impervious surfaces (approximately 0.2 acre). Furthermore, as described in detail in criterion a) above, site-specific BMPs specifically designed to reduce or eliminate construction-related erosion and siltation would be implemented. Due to the nature of the proposed project, no operation-related erosion or siltation would occur. Therefore, this impact would be **less than significant**.

ii) Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site?

Less-than-Significant Impact. The proposed project would add minimal new impervious surfaces (approximately 0.2 acres) as compared to existing conditions and would not alter the existing drainage pattern at the project site. Therefore, the proposed project would not substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or off site, and this impact would be **less than significant**.

iii) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?

No Impact. The proposed project would not increase stormwater runoff at the project site, and BMPs specifically designed to reduce or eliminate construction-related erosion and siltation would be implemented. Therefore, the proposed project would not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; thus, there would be **no impact**.

iv) Impede or redirect flood flows?

No Impact. The project site is not located in a 100-year flood zone (FEMA 2012). Although the site is within a 200-year floodplain (DWR 2025), the proposed project does not include the construction of any buildings that would impede or redirect flood flows. Furthermore, the proposed bleacher seating and press box would be anchored to the ground and would be constructed of open metal that would allow floodwater to flow through. Thus, there would be **no impact**.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less-than-Significant Impact. Because the project site is approximately 83 miles from the Pacific Ocean, there is no hazard from a tsunami. The American River is approximately 450 feet south of the project site at the closest point; however, the project region is not seismically active and there are U.S. Army Corps of Engineers levees on both sides of the American River that have been designed to protect the surrounding development from flood events, including the very low potential for seismic seiches.

The project site is not located in a 100-year flood hazard zone (FEMA 2012). Although the project site is in a 200-year flood zone (DWR 2025), the proposed project would only involve short-term construction activities during the summer months when there is no potential for flood hazards due to the climate patterns in the Sacramento region. The proposed project would not involve use or storage of large amounts of hazardous materials; fuel, oil, and grease within the construction equipment would be the only hazardous materials in the construction staging area or work areas. Therefore, the project would not risk release of pollutants due to inundation from flooding, and this impact would be **less than significant**.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less-than-Significant Impact. For the same reasons described in criteria a) and b) above, the proposed project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan, and this impact would be **less than significant**.

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3.11 LAND USE AND PLANNING

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XI. Land Use and Planning. Would the project:				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☐	☒

3.11.1 DISCUSSION

a) Physically divide an established community?

No Impact. The project site is located in the Arden-Arcade community in unincorporated Sacramento County, surrounded by single-family residential homes to the north, east, and west, and the American River Parkway to the south. The proposed project would improve the existing Raider Stadium by installing lighting, an upgraded PA system, additional bleacher seating, and a press box. All improvements would occur within the existing campus footprint and would not introduce new physical features, such as roadways, fencing, or barriers, that could alter neighborhood circulation or access between surrounding residential areas. The campus and nearby neighborhoods would remain connected by existing roadways (e.g., American River Drive and Fair Oaks Boulevard) and pedestrian routes. Because all improvements are confined to the existing campus and would not modify access or circulation patterns, the proposed project would not physically divide an established community. Therefore, there would be **no impact**.

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

No Impact. The project site is zoned RD-4/PC (Low Density Single-Family Residential/Parkway Corridor), and the Sacramento County General Plan land use designation is LDR (Low-Density Residential) (Sacramento County 2025a). The Arden-Arcade Community Plan land use designation is RD-4/PQP (Public/Quasi-Public) (Sacramento County 2025a). Schools are a primary, permitted use in areas that are zoned residential under the Sacramento County Zoning Code (Sacramento County 2025b:Table 3.1). The proposed improvements at the project site do not require a General Plan amendment, land use or zoning change, or expansion of the campus boundary. Because the existing school land use would remain unchanged and the proposed improvements are entirely within the established campus, no conflict with any land use plan, policy, or regulation would occur. Therefore, there would be **no impact**.

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3.12 MINERAL RESOURCES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. Mineral Resources. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

3.12.1 DISCUSSION

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. Active aggregate mineral resource production in Sacramento County is located along ancestral channels of the American River several miles south of U.S. Highway 50, and along the Cosumnes River near Rancho Murieta to the southeast. Kaolin clay deposits are present in the Sierra Nevada foothills. Important mineral resource deposits are classified by the California Geological Survey as mineral resource zone (MRZ)-2. The project site is in the urbanized Arden-Arcade area, and is classified by the California Geological Survey as MRZ-3: areas containing known or inferred concrete aggregate resources of undetermined mineral resource significance (O’Neal and Gius 2018). The project site has been developed and used as a school since 1963, and the surrounding uses consist of single-family residential development and the American River Parkway; thus, even if any mineral resource deposits were present (which is unknown) there is no opportunity for any such deposits to be mined. Thus, there would be **no impact**.

b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The Sacramento County General Plan (Sacramento County 2017) indicates that the only locally important mineral resource recovery sites in the county are those designated by the California Geological Survey as MRZ-2. In the project region, these MRZ-2 areas for aggregate minerals are located along the active and ancestral channels of the American and Cosumnes Rivers, several miles south of U.S. Highway 50 and near Rancho Murieta, respectively. MRZ-2 areas for kaolin clay are located in the Sierra Nevada foothills. As described in criterion a) above, there are no known mineral resources at the project site or in the immediate project vicinity, which consists of a school, single-family residential development, and the American River Parkway. Thus, there would be **no impact**.

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3.13 NOISE

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. Noise. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☐	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

3.13.1 ENVIRONMENTAL SETTING

The project site is located on the Rio Americano High School campus in unincorporated Sacramento County and is surrounded by primarily residential neighborhoods. The primary source of existing ambient noise in the vicinity of the project site is vehicular traffic along American River Drive and other streets, along with noise generated from activities within the school campus and typical neighborhood activity, such as landscape maintenance. Noise-sensitive land uses include classrooms and outdoor use areas within the school campus itself, along with single-family residences situated immediately east of the stadium and across American River Drive to the north, at distances of approximately 50 to 100 feet from the project site, and additional residences to the west.

SOUND, NOISE, AND ACOUSTICS

Sound is the mechanical energy of a vibrating object transmitted by pressure waves through a liquid or gaseous medium (e.g., air). Noise is defined as sound that is unwanted (i.e., loud, unexpected, or annoying). Acoustics is the physics of sound.

The amplitude of pressure waves generated by a sound source determines the perceived loudness of that source. A logarithmic scale is used to describe sound pressure level in terms of decibels (dB). The threshold of human hearing (near-total silence) is approximately 0 dB. A doubling of sound energy corresponds to an increase of 3 dB. In other words, when two sources at a given location are each producing sound of the same loudness, the resulting sound level at a given distance from that location is approximately 3 dB higher than the sound level produced by only one of the sources. For example, if one automobile produces a sound pressure level of 70 dB when it passes an observer, two cars passing simultaneously do not produce 140 dB; rather, they combine to produce 73 dB.

The typical human ear is not equally sensitive to all frequencies of the audible sound spectrum. As a consequence, when assessing potential noise impacts, sound is measured using an electronic filter that de-emphasizes the frequencies below 1,000 hertz (Hz) and above 5,000 Hz in a manner corresponding to the human ears decreased sensitivity to low and extremely high frequencies instead of the frequency mid-range. This method of frequency weighting is referred to as A-weighting and is expressed in units of A-weighted decibels (dBA). All noise levels reported in this section are in terms of A-weighting. There is a strong correlation between A-weighted sound levels and community response to noise. As discussed above, doubling sound energy results in a 3-dB increase in sound. In typical noisy environments, noise-level changes of 1 to 2 dB are generally not perceptible by the healthy human ear; however, people can begin to detect 3-dB increases in noise levels. An increase of 5 dB is generally perceived as distinctly noticeable and a 10-dB increase is generally perceived as a doubling of loudness.

The following are the sound level descriptors commonly used in environmental noise analysis:

- ▶ **Equivalent sound level (L_{eq}):** An average of the sound energy occurring over a specified time period. In effect, the L_{eq} is the steady-state sound level containing the same acoustical energy as the time-varying sound that actually occurs during the same period. The one-hour, A-weighted equivalent sound level ($L_{eq[h]}$) is the energy average of A-weighted sound levels occurring during a one-hour period.
- ▶ **Maximum sound level (L_{max}):** The highest instantaneous sound level measured during a specified period.
- ▶ **L_{dn} (Day-Night Noise Level):** The 24-hour L_{eq} with a 10 dB “penalty” applied during nighttime noise-sensitive hours, 10:00 p.m. through 7:00 a.m. The L_{dn} attempts to account for the fact that noise during this specific period of time is a potential source of disturbance with respect to normal sleeping hours.
- ▶ **L_n (Statistical Descriptor):** The noise level exceeded n percent of a specific period of time, generally accepted as an hourly statistic. An L_{10} would be the noise level exceeded 10 percent of the measurement period.

Sound from a localized source (i.e., point source) propagates uniformly outward in a spherical pattern, and the sound level attenuates (decreases) at a rate of 6 dB for each doubling of distance from a point/stationary source. Roadways and highways and, to some extent, moving trains consist of several localized noise sources on a defined path; these are treated as “line” sources, which approximate the effect of several point sources. Sound levels attenuate at a rate of 3 dB for each doubling of distance from a line source. Therefore, noise from a line source attenuates less with distance than noise from a point source with increased distance.

GROUNDBORNE VIBRATION

Groundborne vibration is energy transmitted in waves through the ground. Vibration attenuates at a rate of approximately 50 percent for each doubling of distance from the source. This approach considers only the attenuation from geometric spreading and tends to provide for a conservative assessment of vibration level at the receiver.

Vibration is an oscillatory motion that can be described in terms of the displacement, velocity, or acceleration. Vibration typically is described by its peak and root-mean-square (RMS) amplitudes. The RMS value can be considered an average value over a given time interval. The peak vibration velocity is the same as the “peak particle velocity” (PPV), generally presented in units of inches per second. PPV is the maximum instantaneous

positive or negative peak of the vibration signal and is generally used to assess the potential for damage to buildings and structures. The RMS amplitude typically is used to assess human annoyance to vibration, and the abbreviation “VdB” is used in this document for vibration decibels to reduce the potential for confusion with sound decibels.

EXISTING NOISE ENVIRONMENT

The existing noise environment in the vicinity of the project site is primarily influenced by vehicular traffic noise from American River Drive and Fair Oaks Boulevard. School-related activities, including public address announcements, outdoor physical education, and recreational use of athletic fields, also contribute to the local noise setting. The nearest noise-sensitive uses, single-family residences located east of the stadium, across American River Drive to the north, and west of the school campus are affected by typical neighborhood activities such as people talking, car doors closing, dogs barking, operation of landscaping equipment, and vehicle movements.

To document existing conditions, short-term and long-term measurements will be taken at representative receptor locations and documented in the Noise Technical Study prepared for the proposed project EIR. These measurements establish the baseline conditions against which construction and operational noise impacts of the proposed stadium improvements are evaluated.

REFERENCE MEASUREMENTS

To better understand potential stadium noise conditions, reference measurements were taken during a high school football game at El Camino High School (4300 El Camino Avenue, Sacramento) on August 29, 2025, beginning at 7:30 p.m. The monitoring locations were selected to capture noise exposure both adjacent to the bleachers and near surrounding residences. Results show that average noise levels ranged from 65 to 78 dBA L_{eq} with corresponding maximum levels of 79 to 93 dBA L_{max} , depending on proximity to the crowd and speaker systems. Measurements closest to the residences (behind the eastern bleachers and at the northeastern corner of the field) recorded average levels of 65 – 66 dBA L_{eq} , which reflect conditions experienced by nearby residents during an evening game. In contrast, locations adjacent to the PA system and announcer booth recorded higher average levels of 75 - 78 dBA L_{eq} , illustrating the influence of amplified sound and concentrated crowd activity. These measurements are representative of the type of noise generated during nighttime high school football games.

3.13.2 THRESHOLDS OF SIGNIFICANCE

The following thresholds of significance are based on the environmental checklist in Appendix G of the CEQA Guidelines, as amended. Implementing the project would result in a significant noise impact if it would result in:

- generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;
- generation of excessive groundborne vibration or groundborne noise levels; or

- for a project within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, exposure of people residing or working in the project area to excessive noise levels.

The County of Sacramento General Plan Noise Element (County of Sacramento 2017) provides several policies related to land use and noise compatibility. While these policies do not directly apply to the project, they are presented for context. For non-transportation noise sources, the County has established interior and exterior noise standards for daytime and nighttime hours (Table 3.13-1).

For transportation noise sources, the County of Sacramento has established interior and exterior noise standards of 45 dB L_{dn} and 65 dB L_{dn} , respectively, for all residential uses (though the Noise Element stipulates that these noise standards apply to new uses, not existing residential uses affected by increased traffic created by a new use).

Table 3.13-1. Non-Transportation Noise Standards, Sacramento County Noise Element

Receiving Land Use	Outdoor Area Daytime Median L_{50} ⁶	Outdoor Area Daytime Maximum (L_{max})	Nighttime Median L_{50}	Nighttime Maximum (L_{max})	Interior Day and Night Median L_{50}	Interior Day and Night Maximum (L_{max})
All Residential	55	75	50	70	35	55
Churches, Meeting Halls, Schools, Libraries, etc.	55	75	- ⁵	- ⁵	35	60
Office Buildings	60	75	- ⁵	- ⁵	45	65
Commercial Buildings	-	-	- ⁵	- ⁵	45	65
Playgrounds, Parks, etc.	65	75	- ⁵	- ⁵	-	-
Industry	60	80	- ⁵	- ⁵	50	70

Notes:

- ¹ The standards shall be reduced by 5 dB for sounds consisting primarily of speech or music, and for recurring impulsive sounds. If the existing ambient noise level exceeds the standards, then the noise level standards shall be increased at 5 dB increments to encompass the ambient.
- ² Sensitive areas are defined acoustic terminology section.
- ³ Interior noise level standards are applied within noise-sensitive areas of the various land uses, with windows and doors in the closed positions.
- ⁵ The outdoor activity areas of these uses (if any), are not typically utilized during nighttime hours.
- ⁶ Where median (L_{50}) noise level data is not available for a particular noise source, average (L_{eq}) values may be substituted for the standards of this table provided the noise source in question operates for at least 30 minutes of an hour. If the source in question operates less than 30 minutes per hour, then the maximum noise level standards shown would apply.

Source: Sacramento County 2017

The Sacramento County Code Noise Control Ordinance contains performance standards for the purpose of preventing unnecessary, excessive and offensive noise levels within the county. Section 6.68.090 of the Sacramento County Code establishes that noise associated with construction, repair, remodeling, demolition, paving, or grading is exempt from the Noise Ordinance, provided said activities do not take place between the hours of 8:00 p.m. and 6:00 a.m. on weekdays and Friday commencing at 8:00 p.m. through and including 7:00 a.m. on Saturday; Saturdays commencing at 8:00 p.m. through and including 7:00 a.m. on the next following Sunday; and on each Sunday after the hour of 8:00 p.m. Section 6.68.090 of the County Code also exempts a. “[s]chool bands, school athletic and school entertainment events” from regulation under the Noise Ordinance.

While the Sacramento County Code exempts noise generated by school-sponsored athletic events, CEQA requires evaluation of whether a project would cause a substantial temporary or permanent increase in ambient noise levels. Both the County's General Plan Noise Element and the Federal Interagency Committee on Noise (FICON) guidelines, which consider increases of +5 dB where ambient is below 60 dB, +3 dB where ambient is between 60–65 dB, and +1.5 dB where ambient exceeds 65 dB L_{dn} as potentially significant. Applying these thresholds provides a conservative framework for assessing stadium-related noise impacts, particularly during nighttime events when ambient levels are lower and community sensitivity is higher.

3.13.3 DISCUSSION

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

To be determined. This issue will be evaluated in detail in the Environmental Impact Report.

Short-Term Project-Generated Construction Source Noise

Construction of the proposed stadium improvements would occur over a three- to four-month period on the Rio Americano High School campus and include site preparation (e.g., excavation, grading, removal of existing storage), installation of proposed lighting, PA equipment, bleachers and press box, re-paving, and other supporting activities. Depending on the proposed construction processes and necessary equipment, and if construction activities were to occur during more noise-sensitive periods (e.g., evening, nighttime, or early morning), construction activities could result in temporary noise increases that would represent a substantial temporary increase in ambient noise levels. While construction is limited to a few months and will not require substantial earthwork or heavy-duty equipment, determining the potential temporary increase in noise as a result of proposed project construction requires modeling and analysis. A full quantitative noise analysis including modeling of short-term construction source noise will be conducted as part of a Noise Technical Study for the proposed project. The results of this study will be used to inform the evaluation of potential Noise impacts in the EIR. **This impact is to be determined.**

Long-Term Project-Generated Noise

The stadium currently uses portable diesel-powered light towers, which are shorter, temporary, and primarily used to support athletic practices and tournaments, but not high-attendance events. The existing PA system is older and also not typically used for evening or nighttime events. These existing conditions already generate some noise during daytime and some evening activities.

The proposed project would enable larger evening events, such as nighttime football games, as well as larger sporting events and daytime activities, such as graduation ceremonies, potentially increasing both the frequency and magnitude of noise-generating activities relative to existing conditions. Proposed project improvements could increase noise levels from crowd activities, amplified sound from the modernized PA system, new mechanical equipment, and parking lot activities, and increases in traffic volumes during higher- attendance events. Determining the potential change in noise from existing conditions as a result of the proposed project requires detailed modeling and analysis. A full quantitative noise analysis including modeling of potential long-term operational noise sources will be conducted as part of a Noise Technical Study for the proposed project. The

results of this study will be used to inform the evaluation of potential Noise impacts in the EIR. **This impact is to be determined.**

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less-than-Significant Impact. Construction activities associated with the proposed stadium improvements have the potential to generate temporary groundborne vibration, depending on the specific construction equipment used and the duration of operation.

Vibration propagates through the ground and diminishes in magnitude with distance from the source. Equipment anticipated for site preparation and construction could include limited use of larger heavy-duty construction equipment, such as dozers and loaders. According to the Federal Transit Administration (FTA 2018), vibration levels from a large dozer are approximately 0.089 inches per second (in/sec) peak particle velocity [PPV] and 87 vibration decibels [VdB] at 25 feet. Table 3.13-2 summarizes modeled construction vibration levels at noise sensitive locations.

Table 3.13-2. Project Construction Vibration Levels at Closest Sensitive Receptors

Receiver	Location	Shortest Distance (ft) Between Noise-Sensitive Uses and Proposed Construction Areas	Vibration Levels	
			PPV	VdB
Off-site	Residences east of stadium	50	0.031	78
Off-site	Residences north of stadium across American River Drive	100	0.011	69

Source: FTA, Transit Noise and Vibration Impact Assessment, September 2018.

ft = feet

PPV = peak particle velocity

VdB = vibration decibels

Modeled by AECOM 2025.

Using FTA’s recommended procedure for distance attenuation, predicted worst-case vibration levels are approximately 0.031 in/sec PPV and 78 VdB at the nearest residences east of the stadium. These levels would not exceed Caltrans’s structural damage threshold of 0.2 in/sec PPV (Caltrans 2020) or the FTA’s human annoyance threshold of 80 VdB (FTA 2018). The project would not include any long-term operational vibration sources. Therefore, short-term construction activities would not expose nearby residences to excessive groundborne vibration or groundborne noise, and the impact would be considered **less than significant**.

c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

No Impact. The project site is not located within 2 nautical miles of a public or private airport. The nearest airports are Mather Airport, approximately 3.1 miles southeast, and McClellan Airport (formerly McClellan AFB), approximately 5.6 miles northwest of the site. The project is located outside of any airport land use compatibility zones and would not expose people on-site or in the surrounding community to excessive aircraft-related noise. **No impact** would occur.

3.14 POPULATION AND HOUSING

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XIV. Population and Housing. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

3.14.1 DISCUSSION

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

No Impact. The project site is located in the Arden-Arcade community in unincorporated Sacramento County, an established neighborhood community east of the City of Sacramento. The project site surroundings are characterized primarily by single-family residential neighborhoods, with nearby schools, parks and commercial centers, and the American River Parkway.

The proposed project would not expand student capacity, instructional space, or staffing, and would not introduce new employment opportunities or residential housing that could result in a population increase. Therefore, there would be **no impact**.

- b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?**

No Impact. The proposed project would take place entirely within the existing Rio Americano High School campus. The project would not involve activities that would displace people or housing and would not require construction of replacement housing elsewhere. Therefore, there would be **no impact**.

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3.15 PUBLIC SERVICES

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XV. Public Services. Would the project:				
a) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, or the need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☐	☒
Police protection?	☐	☐	☐	☒
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

3.15.1 DISCUSSION

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

Fire protection?

No impact. Fire protection and emergency medical services would continue to be provided by the Sacramento Metropolitan Fire District, which serves the project site within Division 7 (Sacramento Metropolitan Fire District 2025). Division 7 encompasses approximately 15.3 square miles and serves a population of approximately 80,561 residents (Sacramento Metropolitan Fire District 2025). Sacramento Metropolitan Fire District operates several stations in the surrounding service area, including Station 110, located approximately 1.2 miles from the project site at 432 Eastern Ave in the Arden-Arcade community.

The proposed project would upgrade existing athletic facilities at Raider Stadium including installation of lighting, an upgraded PA system, additional bleacher seating, and a press box. The proposed project does not include new buildings, off-site improvements, or facilities that would support enrollment growth, nor would it change San Juan Unified School District enrollment boundaries or procedures. Consequently, the proposed project would not induce population growth or increase long-term demand for fire protection services.

Athletic competitions, graduation ceremonies, school assemblies, and District-authorized community uses already occur on campus or at other San Juan Unified School District facilities and would continue under existing district practices. After project improvements, certain events currently held off-site would instead occur on campus;

however, these are existing school functions and, although additional spectator seating would be provided at the stadium, the use of campus facilities would continue under San Juan Unified School District's existing facility-use procedures, including scheduling, supervision, and community-use protocols outlined in the San Juan Unified School District Board Policy Manual (2025).

Emergency access to the campus would remain unchanged. Because the proposed project would not increase population or the demand for emergency services, and would not require new or expanded fire protection facilities to maintain acceptable service levels, **no impact** related to fire protection services would occur.

Police protection?

No impact. Police protection services are provided by the Sacramento County Sheriff's Office, which serves unincorporated Sacramento County, including the project site. The closest Sheriff service area resources include the North Division patrol coverage, which provides routine patrols, community policing, and emergency response services in the project vicinity (Sacramento County Sheriff's Office 2025).

For the same reasons discussed above, the proposed project would not increase population or the demand for emergency services, and would not require new or expanded police protection facilities to maintain acceptable service levels. Therefore, **no impact** related to police protection services would occur.

Schools?

No impact. For the same reasons discussed above, the proposed project would not increase campus enrollment, expand student capacity, or require new or expanded educational facilities; therefore, **no impact** would occur.

Parks?

No impact. The proposed project does not include residential development, off-site improvements, or facilities that would support population growth, and it would not change San Juan Unified School District enrollment boundaries or procedures. Accordingly, the proposed project would not increase population and therefore would not increase demand for public parks or recreation facilities. Thus, there would be **no impact**.

Other public facilities?

No impact. For the same reasons discussed above, the proposed project would not induce population growth or increase long-term demand on other governmental services or public facilities, such as libraries, community centers, or social service facilities. Thus, there would be **no impact**.

3.16 RECREATION

ENVIRONMENTAL ISSUES	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVI. Recreation.				
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☒	☐

3.16.1 DISCUSSION

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

Less-than-Significant Impact. The Rio Americano High School campus has athletic and recreation facilities serving enrolled students and school-sponsored programs. The proposed improvements at the existing Raider Stadium would support continuing existing athletic, educational and community events on campus and would not increase school enrollment or create new demand for off-site recreation. Certain existing school events currently held off campus may instead occur on campus following improvements. Although this would increase the attendance at events held at Raider Stadium, additional bleacher seating at the stadium is included as part of the proposed project. Because the potential increased attendance would be situated at Raider Stadium within the existing school campus, it would not increase the use of existing neighborhood and regional parks or other recreational facilities, and therefore no physical deterioration of off-site recreational facilities would occur or be accelerated. Therefore, this impact is considered **less than significant**.

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

Less-than-Significant Impact. The proposed project does not include new recreational facilities but would improve recreational facilities at the existing Raider Stadium. The project-related improvements would allow for increased use of the stadium for larger events. However, additional bleacher seating sufficient to accommodate whole-school events is included as part of the proposed project.

The physical environmental impacts associated with construction and operation of the proposed project are evaluated throughout all of the topic areas in this Initial Study, and will be evaluated in the topic areas identified for further evaluation in the focused Environmental Impact Report. There is no impact of the project related to recreational facilities outside of the environmental topic-specific issues evaluated in the Initial Study. Therefore, this impact would be **less than significant**.

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3.17 TRANSPORTATION

ENVIRONMENTAL ISSUES	To Be Studied in Focused EIR	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XVII. Transportation. Would the project:				
a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	☐	☐	☐	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☐	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☐	☐
d) Result in inadequate emergency access?	☐	☐	☐	☐

3.17.1 DISCUSSION

In support of the EIR, a Local Transportation Analysis will be conducted to address localized transportation concerns resulting from implementation of the proposed project. The analysis will address the level of service (LOS) of roadways adjacent to the project site; the number of trips generated from the proposed project; a queuing analysis of key intersections adjacent to the project site; parking supply and demand; and bicycle and pedestrian safety. A Vehicle Miles Traveled (VMT) analysis will also be prepared, which will provide a detailed evaluation of the number of vehicle trips and the associated vehicle miles that would be generated under the proposed project relative to existing conditions. The results of both studies will be used to inform the evaluation of potential transportation impacts in the EIR.

a) Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Impact to be determined. This issue will be evaluated in detail in the Environmental Impact Report.

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

Impact to be determined. This issue will be evaluated in detail in the Environmental Impact Report.

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

Impact to be determined. This issue will be evaluated in detail in the Environmental Impact Report.

d) Result in inadequate emergency access?

Impact to be determined. This issue will be evaluated in detail in the Environmental Impact Report.

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3.18 TRIBAL CULTURAL RESOURCES

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

3.18.1 ENVIRONMENTAL SETTING

NATIVE AMERICAN CONSULTATION

On behalf of San Juan Unified School District, a Sacred Lands Files (SLF) search and request for Assembly Bill (AB) 52 Consultation List was requested by AECOM from the Native American Heritage Commission (NAHC) on November 11, 2025. The purpose of the search was to ascertain whether additional resources or locations that may be of importance to Native Americans who traditionally have resided in the project area are known to exist. On November 14, 2025 the NAHC responded, stating that review of their files yielded positive results and also provided the contact information for local Native American tribes and individuals that may have information regarding tribal cultural resources that may be located within or in the vicinity of the project site, and that could be affected by project implementation.

On November 24, 2025, on behalf of San Juan Unified School District, AECOM sent via email, AB 52 notification and invitation to consult letters to each listed individual and organization on the contact list provided by NAHC. The letter reported the only cultural resource recorded within the project site was the Rio Americano High School campus and the only other cultural resource recorded within 0.1-mile of the project site was an earthen levee. The letter also reported that a pedestrian survey by AECOM archaeologists was conducted in 2010 of the stadium footprint and no precontact or historic-era cultural resources were observed, reported the positive

Sacred Lands Files search results, and formally invited tribal consultation on the project in accordance with AB 52.

United Auburn Indian Community (UAIC) Cultural Regulatory Manager Anna Starkey responded to AECOM via email on December 12, 2025. The UAIC is a federally recognized Tribe comprised of both Miwok and Maidu (Nisenan) Tribal members who are traditionally and culturally affiliated with the project area. Ms. Starkey reported that UAIC reviewed the project area in their Tribal Historic Information System (THRIS) registry that shows four TCRs within a quarter mile, including an oral history described as a burial area and requested AECOM define the extent and maximum depth of the proposed ground disturbing activities. Ms. Starkey stated that UAIC has identified the area as potentially culturally sensitive and would like formally to consult government to government under AB 52.

The Department of Cultural Preservation at Wilton Rancheria responded to AECOM via email on December 15, 2025. Wilton Rancheria is a federally recognized Tribe, are descendants of the Penutian linguistic family identified as speaking the Miwok dialect, and are traditionally and culturally affiliated with the project area. The email was to open consultation and included an attached letter that constitutes as the formal request for tribal consultation under CEQA, signed by Michelle St. Clair the Executive Director of Cultural Preservation. The tribe requested consultation on several topics and discretionary topics, and provided a document request list including completed cultural resources assessments, related assessments, maps, and soil diagrams, in or near the project APE, and to select a meeting date.

No other tribes responded or requested to participate in AB 52 tribal consultation during the 30-day formal notification period.

Further Native American consultation with UAIC and Wilton Rancheria and analysis of project impacts on Tribal Cultural Resources will be addressed in the Environmental Impact Report for this project.

3.18.2 DISCUSSION

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

Impact to be determined. This issue will be further evaluated, and will be presented in detail in the Environmental Impact Report.

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

Impact to be determined. The NAHC Sacred Lands File search was positive. Previous archaeological pedestrian survey in 2010 of the stadium site prior to its construction did not identify any precontact or historic-era cultural resources and the proposed project would involve very limited earth disturbance. This issue will be further evaluated, and will be presented in detail in the Environmental Impact Report.

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3.19 UTILITIES AND SERVICE SYSTEMS

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

3.19.1 DISCUSSION

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

Less-than-Significant Impact. The project site is served by established water, wastewater, stormwater drainage, electric power, natural gas, and telecommunications systems. The proposed project would upgrade existing athletic facilities within the existing campus footprint by installing lighting, an upgraded sound system, additional bleacher seating, and a press box. The proposed project would also result in the removal of two existing light poles that are owned by the Sacramento Metropolitan Utility District; these light poles would no longer be required after the installation of proposed pedestrian access pathway lighting. These improvements would require only minor changes to existing on-site electrical lines and no other changes to existing on-site utility lines or systems that currently serve the campus. Because the project is limited to lighting, sound, and bleacher upgrades within the existing developed area, and existing service connections have adequate capacity, no new utility corridors, off-site extensions, or facility relocations would be required. Construction would be limited to minor grading and trenching within the developed campus. Earthwork would be minimal and confined to previously disturbed areas to accommodate lighting foundations and electrical connections. All construction would occur

within the developed campus. Potential environmental impacts associated with stormwater drainage are addressed in this Initial Study in Section 3.10, “Hydrology and Water Quality.”

WATER

The Rio Americano High School campus receives water service from the Sacramento Suburban Water District (SSWD), which supplies water throughout the Arden-Arcade area (SSWD 2025). The proposed project would not increase student enrollment or induce population growth and would generate only minor, short-term increases in water use associated with intermittent use during athletic events. These events would occur within existing campus facilities (e.g., restrooms and drinking fountains at Raider Stadium) that already accommodate athletic events and spectator attendance under current operations. Because the project would not introduce new buildings or increase the number of water-using fixtures beyond those already present on the campus, water demand would remain within the range of existing conditions. The existing SSWD service connections and on-site distribution system were designed to accommodate full campus occupancy and periodic large events (Brown and Caldwell 2017). Additionally, the San Juan Unified School District periodically hosts similar athletic events at other campuses; the proposed improvements would allow some of these events to occur at Rio Americano High School, representing a reallocation rather than a net increase in districtwide water demand. Therefore, the minor incremental demand from proposed stadium improvements would fall within existing system capacity, and no new or expanded water supply or distribution facilities would be required.

WASTEWATER TREATMENT

Wastewater conveyance and treatment services are provided by the Sacramento Area Sewer District (SASD) (SASD 2025). Existing conveyance pipelines in the surrounding neighborhood serve the campus and are part of the SASD collection system designed to accommodate routine variations in wastewater flow from institutional land uses (SASD 2020). The proposed project would not introduce new land uses or increase long-term wastewater generation beyond existing conditions. Wastewater produced during athletic events would be intermittent and limited to restroom use within existing school facilities that already accommodate a comparable number of users on a daily basis. No wastewater improvements or new treatment capacity would be required.

ELECTRIC POWER, NATURAL GAS, AND TELECOMMUNICATIONS SERVICES

Electric power, natural gas, and telecommunications services are currently provided to the campus by existing utility providers and would continue as part of the proposed project. New electrical connections required for the proposed improvements would be installed within the existing developed campus and would connect to existing on-site service lines. These improvements would not necessitate the expansion or relocation of off-site utility infrastructure.

CONCLUSION

All proposed improvements would occur within the existing Rio Americano High School campus, which is currently served by established utility systems with adequate capacity. The proposed project would not require or result in the relocation or construction of new or expanded water, wastewater, electric power, natural gas, or telecommunications facilities that could cause significant environmental effects. Therefore, impacts related to utility infrastructure would be **less than significant**.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Less-than-Significant Impact. The proposed project would not increase student enrollment, expand the campus student population, or otherwise induce population growth and therefore would not increase long-term water demand beyond existing conditions. Short-term water use associated with athletic events would continue to be met through the existing SSWD service connection that currently serves the campus. The SSWD Water System Master Plan (2017) identifies adequate water supplies to meet existing and planned development within its service area under normal, single-dry, and multiple-dry year conditions. Because the proposed project would not alter operational characteristics or require additional water-supply entitlements, existing water supplies would remain sufficient to meet project demands under all hydrologic conditions. This impact would be **less than significant**.

c) Result in a determination by the wastewater treatment provider that serves or may serve the project that it has adequate capacity to serve the project's projected demand, in addition to the provider's existing commitments?

Less-than-Significant Impact. The proposed project would not increase student enrollment, expand campus student population, or introduce new land uses that would generate long-term wastewater demand. SASD provides wastewater service to the campus. Wastewater generated during athletic events would occur within existing restroom facilities currently served by SASD's established system capacity. No new off-site conveyance improvements or treatment plant expansion would be required. Therefore, sufficient wastewater treatment capacity exists to accommodate the project, and this impact would be **less than significant**.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less-than-Significant Impact. The project would not increase student enrollment, campus student population, or daily operational intensity and therefore would not substantially increase solid-waste generation. Construction and event-related waste would be temporary and limited in scale relative to existing San Juan Unified School District operations. Operational waste would continue to be collected and processed through the San Juan Unified School District's existing solid-waste and recycling service provider in compliance with applicable state and local regulations. The project would adhere to the San Juan Unified School District's established procurement and waste-management practices, including recycling and diversion requirements. Therefore, impacts related to solid-waste generation and disposal capacity would be **less than significant**.

e) Comply with federal, State, and local management and reduction statutes and regulations related to solid waste?

Less-than-Significant Impact. Solid waste collection and disposal services for the project site are provided through the Sacramento County Department of Waste Management and Recycling, which oversees waste handling, recycling, and disposal within unincorporated Sacramento County. Solid waste from the Rio Americano High School campus is transported to permitted regional facilities such as the North Area Recovery Station and Kiefer Landfill, both of which have adequate remaining capacity and operate in compliance with the California Department of Resources Recycling and Recovery (CalRecycle) regulations (CalRecycle 2025).

During construction, waste would be generated by demolition of several existing metal storage sheds on the northwest side of the stadium and a small storage building on the southeast side of the stadium, along with

packaging and limited materials from facility upgrades. To the extent feasible, soil from trenching would be reused on site as backfill. The contractor would be required to comply with the California Green Building Standards Code, which mandates diversion of at least 65 percent of construction and demolition debris from landfills through reuse or recycling. Compliance is achieved through preparation and implementation of a Waste Management Plan identifying the approved waste hauler and sorting facility, with documentation maintained to verify diversion rates (CalRecycle 2023). During operation, solid waste and recyclables generated from athletic events and routine campus activities would continue to be managed through the San Juan Unified School District's existing collection and recycling services in accordance with applicable State and local waste-reduction mandates. Because the project would adhere to all applicable federal, State, and local regulations governing waste reduction and recycling, and because adequate permitted facilities exist to receive project-generated waste, the project would not conflict with any applicable solid waste management or reduction regulations. Therefore, this impact would be **less than significant**.

3.20 WILDFIRE

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

3.20.1 DISCUSSION

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

No Impact. Public Resources Code Sections 4201-4204 and Government Code Sections 51175-51189 require identification of fire hazard severity zones within the State of California. The California Department of Forestry and Fire Protection (CAL FIRE) has established a fire hazard severity classification system. Fire prevention areas considered to be under state jurisdiction are referred to as “state responsibility areas” (SRAs). In SRAs, CAL FIRE is required to delineate three wildfire hazard ranges: moderate, high, and very high. “Local responsibility areas” (LRAs), which are under the jurisdiction of local entities (e.g., cities, counties), are required only to identify very high fire severity zones.

The project site is located in a primarily urbanized area of unincorporated Sacramento County and is not situated within or near an SRA (CAL FIRE 2025). The closest SRA is located approximately six miles southeast of the project site. The project site and the surrounding area are in an LRA. Per Ordinance No. 2025-01, the Sacramento Metropolitan Fire District adopted the CAL FIRE 2025 Fire Hazard Severity Zone Map for Sacramento County as recommended by CAL FIRE for the Sacramento Metropolitan Fire District’s service area, and CAL FIRE has not designated any very high fire hazard severity zones at the project site or in the project area (CAL FIRE 2025). Therefore, the project would have no impact. (See Section 3.9, “Hazards and Hazardous Materials,” for a detailed analysis related to emergency evacuation planning.)

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

No Impact. As discussed under criterion (a) above, the project site is within a primarily urbanized area and is not located in or near an SRA or any designated moderate, high, or very high Fire Hazard Severity Zone (CAL FIRE 2025). Furthermore, the project site consists of flat topography, paved circulation areas, turf athletic fields, Raider Stadium, and minimal urban landscaping. Therefore, no impact would occur.

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

No Impact. As discussed under criterion (a) above, the project site is located within a primarily developed, urbanized area and is not within or near an SRA nor designated as a moderate, high, or very high Fire Hazard Severity Zone (CAL FIRE 2025). Furthermore, the proposed project does not require installation or maintenance of infrastructure that could exacerbate fire risk. Thus, there would be **no impact**.

- d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?**

As discussed under criterion (a) above, the project site is not situated within or near a SRA nor designated as a moderate, high, or very high Fire Hazard Severity Zone (CAL FIRE 2025). Furthermore, the topography at the project site is flat. Therefore, **no impact** would occur.

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None

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None

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