

Rio Americano High School Stadium Improvements Project Draft Environmental Impact Report

SCH Number: 2026010094



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Prepared for:

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TABLE OF CONTENTS

Section	Page
1 EXECUTIVE SUMMARY	1-1
1.1 Project Requiring Environmental Analysis	1-1
1.2 Alternatives to the Project	1-1
1.2.1 Alternative 1: No Project Alternative	1-2
1.2.2 Alternative 2: Reconfigure Stadium and Athletic Fields	1-2
1.3 Potential Areas of Concern and Issues to be Resolved	1-2
1.4 Summary of Impacts and Mitigation Measures	1-3
2 INTRODUCTION.....	2-1
2.1 Purpose and Scope	2-1
2.2 Environmental Review Process	2-1
2.2.1 Notice of Preparation and Scoping	2-2
2.3 Organization and Content of this Draft EIR	2-3
2.4 Required Approvals	2-3
3 PROJECT DESCRIPTION	3-1
3.1 Project Location and Surrounding Land Uses	3-1
3.1.1 Regional and Local Project Location	3-1
3.1.2 Project Background	3-1
3.1.3 Existing and Surrounding Land Uses and Zoning	3-4
3.2 Proposed Project Characteristics	3-4
3.2.1 Project Components	3-4
3.2.2 Operations Plan	3-6
3.2.3 Schedule of Uses	3-6
3.3 Project Construction Activities	3-8
3.4 Project Objectives	3-10
3.5 Project Environmental Impact Avoidance and Minimization Measures	3-10
3.6 Required Project Approvals	3-11
4 ENVIRONMENTAL IMPACT ANALYSIS.....	4.0-1
4.0 Approach to the Analysis	4.0-1
4.0.1 Introduction	4.0-1
4.0.2 Format and Content	4.0-1
4.0.3 Terminology used to Describe Impacts	4.0-2
4.1 Aesthetics	4.1-1
4.1.1 Environmental Setting	4.1-1
4.1.2 Regulatory Setting	4.1-11
4.1.3 Environmental Impacts and Mitigation Measures	4.1-15
4.2 Biological Resources	4.2-1
4.2.1 Environmental Setting	4.2-1
4.2.2 Regulatory Setting	4.2-10
4.2.3 Environmental Impacts and Mitigation Measures	4.2-14

4.3	Noise and Vibration.....	4.3-1
4.3.1	Environmental Setting.....	4.3-1
4.3.2	Regulatory Setting.....	4.3-9
4.3.3	Environmental Impacts and Mitigation Measures.....	4.3-14
4.4	Transportation and Circulation.....	4.4-1
4.4.1	Environmental Setting.....	4.4-1
4.4.2	Regulatory Framework.....	4.4-6
4.4.3	Environmental Impacts and Mitigation Measures.....	4.4-7
4.5	Tribal Cultural Resources.....	4.5-1
4.5.1	Environmental Setting.....	4.5-1
4.5.2	Regulatory Setting.....	4.5-3
4.5.3	Methodology	4.5-6
4.5.4	Environmental Impacts and Mitigation Measures.....	4.5-10
5	EFFECTS FOUND TO BE LESS THAN SIGNIFICANT.....	5.0-1
5.0	Introduction	5.0-1
5.1	Agricultural and Forestry Resources	5.1-1
5.2	Air Quality.....	5.2-2
5.3	Cultural Resources	5.3-12
5.4	Energy Resources	5.4-15
5.5	Geology and Soils	5.5-16
5.6	Greenhouse Gas Emissions	5.6-18
5.7	Hazards and Hazardous Materials	5.7-22
5.8	Hydrology and Water Quality	5.8-25
5.9	Land Use and Planning.....	5.9-29
5.10	Mineral Resources	5.10-31
5.11	Population and Housing	5.11-31
5.12	Public Services	5.12-32
5.13	Recreation.....	5.13-33
5.14	Utilities and Service systems.....	5.14-34
5.15	Wildland Fire Hazards.....	5.15-37
6	ALTERNATIVES.....	6-1
6.1	Introduction	6-1
6.2	Selection of Alternatives	6-2
6.2.1	Criteria.....	6-2
6.2.2	Project Objectives	6-3
6.3	Alternatives Considered but Rejected as Infeasible	6-3
6.3.1	Off-Campus Project Location – New Stadium with Lighting.....	6-3
6.3.2	Rescheduling to Morning Hours	6-4
6.3.3	Use Alternate Existing Stadiums.....	6-4
6.4	Alternatives Considered in Detail in this EIR	6-4
6.4.1	Alternative 1: No Project Alternative.....	6-4
6.4.2	Alternative 2: Reconfigure Stadium and Athletic Fields.....	6-5
6.5	Alternatives Analysis	6-6

6.5.1	Aesthetics	6-6
6.5.2	Air Quality.....	6-8
6.5.3	Biological Resources.....	6-8
6.5.4	Cultural Resources	6-9
6.5.5	Energy	6-9
6.5.6	Geology and Soils	6-10
6.5.7	Greenhouse Gas Emissions	6-10
6.5.8	Hazards and Hazardous Materials	6-11
6.5.9	Hydrology and Water Quality	6-11
6.5.10	Land Use and Planning.....	6-12
6.5.11	Noise and Vibration.....	6-13
6.5.12	Recreation.....	6-14
6.5.13	Transportation and Circulation.....	6-15
6.5.14	Tribal Cultural Resources.....	6-16
6.5.15	Utilities and Service Systems	6-16
6.6	Environmentally Superior Alternative	6-17
7	CUMULATIVE IMPACTS AND OTHER CEQA CONSIDERATIONS.....	7-1
7.1	Cumulative Impacts.....	7-1
7.1.1	Definition	7-1
7.1.2	Approach	7-1
7.1.3	Cumulative Impact Analysis	7-2
7.2	Growth Inducement	7-13
7.3	Irreversible Environmental Changes	7-14
7.4	Significant and Unavoidable Adverse Impacts	7-14
7.4.1	Project-Level Noise and Vibration.....	7-14
7.5	Mandatory Findings of Significance	7-14
8	REFERENCES	8-1
9	LIST OF PREPARERS.....	9-1
10	ACRONYMS	10-1

Exhibits

Exhibit 3-1	Regional Project Location	3-2
Exhibit 3-2	Project Site	3-3
Exhibit 3-3	Proposed Project Improvement Areas	3-5
Exhibit 4.1-1	Key Observation Points	4.1-2
Exhibit 4.2-1	CNDDDB Records of Special-Status Species Within 5-miles of the Project Site	4.2-8
Exhibit 4.3-1	Ambient Noise Survey	4.3-4
Exhibit 4.3-2	Existing Game Noise Survey	4.3-7
Exhibit 4.4-1	Project Location and Study Area.....	4.4-2
Exhibit 4.4-2	Project Location and Study Area.....	4.4-5

Tables

Table 1-1	Summary of Impacts and Mitigation Measures.....	1-4
Table 3-1	Existing and Future (with Proposed Project) Stadium Events	3-9
Table 4.2-1	Special-Status Species with Potential to Occur within or near the Project Site.	4.2-4
Table 4.3-1	Summary of Ambient Noise Level Survey Results in the Vicinity of the Project Site	4.3-3
Table 4.3-2	Summary of Evening Soccer Game Noise Measurements at Rio Americano High School.....	4.3-5
Table 4.3-3	Summary of Modeled Levels of Existing Traffic Noise (Average Daily Traffic)	4.3-8
Table 4.3-4	Summary of Modeled Levels of Existing Traffic Noise (Peak-Hour Volume).....	4.3-8
Table 4.3-5	LCI Land Use Noise Compatibility Guidelines	4.3-10
Table 4.3-6	Human Responses to Vibration Levels, Peak Vibration Threshold	4.3-11
Table 4.3-7	Structural Responses to Vibration Levels, Peak Vibration Threshold	4.3-11
Table 4.3-8	Significant Change in Ambient Noise Levels	4.3-11
Table 4.3-9	Noise Standards for New Uses Affected by Traffic and Railroad Noise	4.3-12
Table 4.3-10	Non-Transportation Noise Standards Median/Maximum	4.3-13
Table 4.3-11	Noise Control Ordinance Zoning District Standards.....	4.3-14
Table 4.3-12	Noise Control Ordinance Cumulative Duration Allowance (dB)	4.3-14
Table 4.3-13	Ambient and Project Construction Noise Levels at Closest Sensitive Receptors	4.3-17
Table 4.3-14	Summary of Modeled Levels of Existing plus Average Project Traffic Noise (Average Daily Traffic).....	4.3-21
Table 4.3-15	Summary of Modeled Levels of Existing plus Average Project Traffic Noise (Peak-Hour Volume).....	4.3-21
Table 4.3-16	Summary of Modeled Levels of Existing plus Peak-Attendance Project Traffic Noise (Average Daily Traffic).....	4.3-21
Table 4.3-17	Summary of Modeled Levels of Existing plus Peak-Attendance Project Traffic Noise (Peak-Hour Volume)	4.3-22
Table 4.3-18	Project Construction Vibration Levels at Closest Sensitive Receptors.....	4.3-27
Table 5.2-1	Summary of Unmitigated Construction-Related Emissions of Criteria Air Pollutants and Precursors	5.2-5
Table 5.2-2	Summary of Operational Emissions of Criteria Air Pollutants and Precursors.....	5.2-6
Table 5.6-1	Proposed Project Construction-Related and Operational GHG Emissions	5.6-21
Table 6-1	Comparison of Impacts of the Alternatives to the Proposed Project.....	6-17
Table 7-1	List of Cumulative Projects	7-2

Appendices

- A. Notice of Preparation and Comment Letters
- B. MUSCO Lighting Report and International Dark Sky Association Certificate
- C. Bat Survey Memo
- D. Noise Data
- E. Transportation LTA Memo
- F. Transportation VMT Analysis
- G. Air Quality and Greenhouse Gas Data and Calculations

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1 EXECUTIVE SUMMARY

This Environmental Impact Report (EIR) evaluates the physical environmental impacts of implementing the proposed Rio Americano High School Stadium Improvements project (the proposed project) as required by the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Section 21000 et seq.) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 et seq.).

1.1 PROJECT REQUIRING ENVIRONMENTAL ANALYSIS

The San Juan Unified School District (District) is proposing to implement improvements associated with Raider Stadium on the existing on the high school campus, 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. Raider Stadium 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 system. Bleacher seating is available at the 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 and games, 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 earlier in the day. Due to the lack of adequate sports lighting and due to the current limited capacity, some events, such as home varsity football games and graduation ceremonies, are hosted elsewhere and not on the Rio Americano High School campus.

The proposed project includes installation of four new high-mast light standards (each 80 feet tall), removal of exiting bleachers and installation of new and expanded bleacher seating that would accommodate additional spectators, an upgraded public address system, and a new press box. New light standards (each 15 feet tall) would also be installed along the existing paved fire lane between the stadium and the main campus parking lot to provide pedestrian safety. All light standards would be shielded and directed downwards to reduce light spillover and nighttime glare. The high-mast light standards at the stadium have been designed to meet the International Dark Sky Association standards. The proposed stadium lighting would be used on select evenings to accommodate athletic practices and competitions, primarily during the winter months when the sun sets early, as well as select throughout the year events that run later into the evening. Use of the proposed lighting would replace the current field lighting provided by portable diesel-powered lights, which are not designed to focus light on the field of play or shield lighting to avoid glare.

1.2 ALTERNATIVES TO THE PROJECT

The CEQA Guidelines (Section 15126.6) require that an EIR describe a range of reasonable alternatives to the proposed project that could feasibly attain the basic objectives of the project and avoid and/or lessen the environmental effects of the project. Below is a summary of the alternatives to the proposed project, which are considered in Chapter 6, "Alternatives," of this EIR.

1.2.1 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) states that a discussion of the “No Project” alternative must consider “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans.”

For the purposes of the No Project Alternative, the proposed project would not be constructed, and athletic activities would continue to occur as they are presently as described in Chapter 3, “Project Description.”

Generally, this means that sports practices and games would occur regularly throughout the respective seasons, including evening and nighttime practices and games with continued use of existing portable lights that have been used in the past (i.e., 11.7-horsepower diesel-powered LED light towers). Under the No Project Alternative, as with existing conditions, Rio Americano High School would continue to use the El Camino High School Stadium approximately 3 miles to the north, which is equipped with high-mast lighting for nighttime games. The El Camino High School Stadium has a capacity to host up to 3,000 people.

1.2.2 ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Rio Americano High School was originally constructed in 1963, and the track/football field, along with the adjacent baseball, softball, and soccer fields on the campus to the north, have existed in their current locations since 1963. Under Alternative 2, the existing Raider Stadium would be demolished and rebuilt at the northeastern end of the campus adjacent to and south of American River Drive (approximately 875 feet north of the American River Parkway), with the same proposed high-mast lighting, new and expanded bleacher seating, new press box, and upgraded public address system. The stadium would be the same size and would have the same facilities. In addition, the existing baseball and soccer fields would be moved to the south, where the stadium is presently located. In order to accommodate Raider Stadium at this new location, a portion of the main campus parking area, where solar panels are currently mounted on a shade structure, would be relocated to the south. As with the proposed project, pedestrian pathway lighting from the relocated parking area to the new stadium would be required. To provide a noise and visual buffer for the residents to the north and east, a 100-foot-wide landscape area consisting primarily of fast-growing evergreen trees specifically designed to provide an acoustical reduction of 5 to 8 A-weighted decibels (dBA), would be installed along the campus property boundary north and east of the new stadium (i.e., along American River Drive east of the main campus parking area, and along the eastern campus property boundary). The existing line of tall trees along the campus’ southern boundary (adjacent to the current Raider Stadium) would be retained.

1.3 POTENTIAL AREAS OF CONCERN AND ISSUES TO BE RESOLVED

CEQA Guidelines Section 15123 suggests that an EIR include a summary of “areas of controversy known to the Lead Agency” and “[i]ssues to be resolved.” Topics addressed in response to the Notice of Preparation (NOP) and the Initial Study circulated with the NOP represent the most comprehensive list of issues of interest for the proposed project. The primary areas of concern are listed below:

- ▶ aesthetics values from the American River Parkway;
- ▶ noise and nighttime lighting impacts on wildlife in the American River Parkway;
- ▶ noise and nighttime lighting impacts on surrounding residents;
- ▶ increased traffic from increased attendance at nighttime games; and
- ▶ lack of sufficient parking.

Copies of the NOP comment letters, along with a summary of all of the comments received, are contained in Appendix A to this EIR. SJUSD has reviewed and considered all of the comments submitted in response to the NOP and the Initial Study during preparation of the Draft EIR.

1.4 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table 1-1 summarizes the impacts, mitigation measures, and resulting level of significance after mitigation for the relevant environmental topic areas evaluated for the proposed project. The table is intended to provide an overview, as required by the CEQA Guidelines Section 15123; narrative discussions for each topic area are included in the corresponding sections of Chapters 4, 5, and 7 in this EIR.

Table 1-1. Summary of Impacts and Mitigation Measures

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Aesthetics Impact 4.9-1. Substantially Degrade the Existing Visual Character or Quality of the Project Site, or Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality?	LTS	None	LTS
Aesthetics Impact 4.1-1. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?	PS	Mitigation Measure 4.1-2: Obtain a “pass” Rating for Project Lighting Design from the International Dark Sky Association Backlight, Uplight, and Glare Prior to the start of construction, the District shall submit the proposed lighting design to the International Dark Sky Association for a Design Analysis and request a determination as to whether the design meets the program guidelines. Should the design not meet the program guidelines, the District will refine and resubmit until the design receives a “pass” rating. The approved designs would be validated through receipt of an International Dark-Sky Association approval letter. Construction shall not commence until the design receives the “pass” rating and approval letter.	LTS
Agriculture and Forestry Resources	No Impact	None	No Impact
Air Quality Impact 5.2-1: Conflict with or obstruct implementation of the applicable air quality plan?	Construction: PS Operations: LTS	Mitigation Measure 5.2-1: 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).	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		▶ 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.	
Air Quality Impact 5.2-2: 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?	Construction: PS Operations: LTS	Implement Mitigation Measure 5.2-1: Implement the SMAQMD Basic Construction Emission Control Practices.	
Air Quality Impact 5.2-3: Expose sensitive receptors to substantial pollutant concentrations?	LTS	None	LTS
Air Quality Impact 5.2-4: Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	LTS	None	LTS
Biological Resources Impact 4.2-1: 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 Wildlife or U.S. Fish and Wildlife Service?	Construction: PS Operations: LTS	Construction Mitigation Measures The following mitigation measures will be implemented to avoid and minimize potential project-related impacts during project construction: Mitigation Measure 4.2-1a: 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.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		Mitigation Measure 4.2-1b: Best Management Practices for Biological Resources ▶ Construction staging, storage, and parking areas will be within previously developed areas in the existing school campus, such as the stadium, adjacent athletic fields, or paved parking areas. No staging or stockpiling will occur outside of the Rio Americano High School property boundary. ▶ All equipment will be maintained to prevent leakage of vehicle fluids such as gasoline, oils, or solvents. 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. Discharge of pollutants into storm drains from vehicle and equipment cleaning will be prohibited. ▶ Construction-related trenches and holes shall be covered at the end of each workday and/or fitted with an escape ramp of sufficient strength and grade for successful wildlife escape. All construction-related excavations will be thoroughly inspected for the presence of wildlife once per day and prior to being filled. A qualified biologist will be on-call to advise or assist with relocating any entrapped wildlife, as necessary. ▶ All food-related trash items, such as wrappers, cans, bottles, and food scraps, will be disposed of in closed containers and removed from the construction site at least once daily at the end of each working day. Mitigation Measure 4.2-1c: Blue Elderberry Avoidance. Prior to project construction, all blue elderberry shrubs within 165 feet of the proposed project construction footprint will be flagged or otherwise marked for avoidance (e.g., staked, fenced) under supervision of a qualified biologist. Construction activity will have an avoidance area of at least 20 feet from the dripline (i.e., the area directly under the outer circumference of a shrub's branches) of existing blue elderberry shrubs. A qualified biologist will monitor all work within the 20-foot avoidance buffer to ensure blue elderberry shrubs are not inadvertently damaged during construction activities.	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		Mitigation Measure 4.2-1d: Northwestern Pond Turtle Protections. ► Preconstruction Surveys: A qualified biologist will survey the project site for northwestern pond turtles no more than 48 hours before the initiation of construction activities. The existing chain link fence will be surveyed to assess whether it sufficiently excludes turtles from the project site, or if holes or openings in and under fencing are present. If the fence is determined to be insufficient, exclusionary devices shall be employed (wood planks, wire mesh repair, etc.). ► Northwestern Pond Turtle Encounters: If any life stage of 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. Mitigation Measure 4.2-1e: Nesting Bird Protections. ► 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., <i>Recommended Timing and Methodology for Swainson's Hawk Nesting Surveys in California's Central Valley</i> [SHTAC 2000]).	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		► Nest Avoidance: If the qualified biologist observes an active nest within the project site or surrounding areas, the qualified biologist will prescribe and establish an appropriate no-disturbance buffer between the nest and active construction. 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. If an active nest is discovered during the course of construction, the same baseline monitoring will be conducted to establish a buffer. 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 the necessary buffer distance to avoid distress or unusual behaviors 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.	
Biological Resources Impact 4.2-2: 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 Wildlife or US Fish and Wildlife Service?	NI	None	NI
Biological Resources Impact 4.2-3: 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?	NI	None	NI
Biological Resources Impact 4.2-4: 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?	LTS	None	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Biological Resources Impact 4.2-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	NI	None	NI
Biological Resources Impact 4.2-6: Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	NI	None	NI
Cultural Resources Impact 5.3-1: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	NI	None	NI
Cultural Resources Impact 5.3-2: Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	PS	Mitigation Measure 5.3-2: Appropriate Treatment for Inadvertent Discovery of 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.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Cultural Resources Impact 5.3-3: Disturb any human remains, including those interred outside of dedicated cemeteries?	PS	Mitigation Measure 5.3-3: Appropriate Action for Inadvertent Discovery of 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.	LTS
Energy	LTS	None	LTS
Geology, Soils, and Paleontological Resources	LTS	None	LTS
Greenhouse Gas Emissions	LTS	None	LTS
Hazards and Hazardous Materials	LTS	None	LTS
Hydrology and Water Quality	LTS	None	LTS
Land Use and Planning	LTS	None	LTS
Mineral Resources	LTS	None	LTS
Noise and Vibration Impact 4.3-1: 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?	PS	Mitigation Measure 4.3-1a: Implement Measures to Reduce Short-Term, Construction-Related Noise. ► Provide written notification to residences east and northeast of Rio Americano High School and north across American River Drive that are within 500 feet of active construction areas, at least three weeks prior to the start of construction. The notification shall identify the type, duration, and frequency of construction activities and provide a mechanism for residents to contact the District regarding construction noise. Contact information shall also be posted in conspicuous locations adjacent to the site. The notification shall include anticipated dates and hours of construction and a daytime telephone number for the designated project representative. Recommendations to assist nearby residents in reducing interior noise levels (e.g., closing windows and doors) shall also be included.	SU

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		▶ Prohibit the use of materials and equipment deliveries and the start-up or operation of construction equipment before 7:00 a.m. and after 7:00 p.m., Monday through Saturday and before 9:00 a.m. and past 5:00 p.m. on Sunday. ▶ Restrict the use of bells, whistles, alarms, and horns to safety-warning purposes. ▶ Locate construction equipment (e.g., compressors and generators), construction staging areas, and stockpiling areas at least 150 feet from the eastern project site boundary, the American River Parkway, and American River Drive. Mitigation Measure 4.3-1b: Implement Stadium Event Noise Controls. The District shall implement stadium event noise controls to reduce off-site noise exposure from crowd activity, bleacher activity, band activity, artificial noisemakers, and public address/amplified sound. The noise control measures shall include the following requirements: <i>Public Address System Design and Operation</i> ▶ The public address system shall be designed as a distributed speaker system using multiple, smaller speakers located closer to the intended audience areas, such as on or near the bleachers, press box, or snack bar/concession area, rather than relying on high-mounted speakers. ▶ Speakers shall be aimed downward and toward the seating and field areas, and shall be oriented away from nearby residential properties. ▶ Speakers shall use controlled dispersion patterns to focus sound within the stadium seating and field areas and minimize spillover toward adjacent residences. ▶ The public address system shall include zone controls that allow speakers or speaker groups not needed for a particular event, such as visitor-side speakers or ancillary speakers, to be turned off. ▶ The public address system settings shall be established at the minimum levels required for intelligibility over background crowd noise. ▶ The public address system shall include digital signal processing or equivalent volume-limiting controls to establish a maximum output level that cannot be exceeded by event staff.	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<i>PA System Testing and Performance Standard</i> ▶ Prior to operation of the permanent public address system for evening events, the District shall conduct a sound check and property-line noise measurement to verify that public address system settings minimize off-site sound exposure. The sound check shall be conducted during daytime hours and shall include measurements at the eastern property boundary adjacent to residences and at a representative receptor north of the stadium across American River Drive. ▶ The public address system shall be adjusted, and additional controls shall be installed, if necessary, to achieve a maximum PA system noise level of 70 dBA L_{max} at the nearest residential property line. An alternative performance level may be used only if it is supported by final public address system design, speaker layout, receptor distances, and field verification, and only if it is demonstrated to be equally or more protective of nearby residential receptors. ▶ The approved public address settings shall be documented and maintained for evening events. The District shall prohibit event staff from increasing public address volume above the approved settings. <i>Event Scheduling and Use Restrictions</i> ▶ Evening events shall be scheduled to conclude by no later than 10:00 p.m., recognizing that certain events, such as football games, may occasionally extend beyond 10:00 p.m. due to overtime or other circumstances outside the District's control. ▶ If an event extends beyond 10:00 p.m., use of the public address system, amplified music, and band activity shall cease after 10:00 p.m., except for brief safety- or emergency-related announcements. ▶ Public address system sound checks and speaker testing shall be limited to daytime hours. ▶ Where public address system use is not necessary for a particular event or activity, use of the public address system shall be prohibited. <i>Artificial Noisemakers and Spectator Controls</i> ▶ Artificial noisemakers, including air horns, bullhorns, cowbells, megaphones, amplified cheering devices, and similar items, shall be prohibited at evening stadium events. The District shall provide notice of this restriction in event materials and signage. Bags may be subject to inspection consistent with District policy, and attendees shall not be permitted to use prohibited noisemakers. ▶ The District shall post signage and provide event announcements requesting that attendees depart quietly and respect nearby residential neighborhoods.	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		<i>Bleacher and Ramp Noise Controls</i> ▶ The bleacher design shall include noise-reducing design features for ramps, platforms, or other walking surfaces that could generate elevated footfall or vibration-related noise. Such features may include anti-slip resilient coating, sound-deadening treatment on the underside of ramps, or absorptive or shielding material along bleacher sides, provided that these features do not interfere with safety, drainage, accessibility, maintenance, or spectator sightlines. ▶ Noise-reducing treatments shall not be required on bleacher step surfaces where the District determines that such treatments would be infeasible due to durability, weather exposure, maintenance, or safety concerns.	
Noise and Vibration Impact 4.3-2: Generation of excessive groundborne vibration or groundborne noise levels?	LTS	None	LTS
Population and Housing	NI	None	NI
Public Services	NI	None	NI
Recreation	LTS	None	LTS
Transportation Impact 4.4-1: Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities	LTS	None	LTS
Transportation and Circulation Impact 4.4-2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	LTS	None	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
Transportation and Circulation Impact 4.4-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	PS	Mitigation Measure 4.4-3a: Update the Memorandum of Understanding with Jesuit High School for Shared Parking Use Agreement Before the first varsity home football game or other nighttime stadium event anticipated to require off-site parking, which would be an estimated attendance of approximately 1,585 persons or more (a data point that can be adjusted through monitoring of measured demand and parking conditions to identify the capacity that is accommodated through on-site parking), the District shall coordinate with Jesuit High School for a Shared Parking Use Agreement, such that attendees to Rio Americano High School events may utilize on-site parking at Jesuit High School to accommodate parking needs when the Rio Americano High School on-site parking capacity would be exceeded. The Shared Parking Use Agreement shall include communication protocol to both confirm that there are not existing high-attendance event occurring at Jesuit High School that would preclude the availability of excess parking, as well as signage direction attendees to and security protocol to ensure that on-site Jesuit parking areas are open and available to Rio Americano High School event attendees. Mitigation Measure 4.4-3b: Implement an Event Transportation Management Plan Before the first varsity home football game or other nighttime stadium event anticipated to require off-site parking, the District shall update its Night Event Management Standards to incorporate an Event Transportation Management Plan prepared by a qualified transportation professional. The District shall implement the Event Transportation Management Plan for each such event. The plan shall: ▶ Estimate anticipated event attendance and parking demand and identify the number and location of available on-campus and overflow parking spaces. ▶ Identify designated legal off-site parking locations and pedestrian routes or transportation arrangements between those locations and Raider Stadium. ▶ Provide advance information to attendees regarding available parking, designated pedestrian routes, and applicable parking restrictions. ▶ Provide event staff and directional signs at campus access points, parking areas, and locations where substantial pedestrian and vehicle conflicts are anticipated. ▶ Identify the roadway crossing location or locations that attendees would be directed to use and implement appropriate safety treatments identified in the LTA, which may include high-visibility crosswalk markings, parking restrictions on crossing approaches, nighttime lighting, pedestrian crossing-warning signs, and an advance yield or stop line and associated signage.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		▶ Prevent event-related parking, signs, equipment, or vehicle queues from obstructing driveways, sidewalks, bicycle lanes, pedestrian crossings, accessible routes, fire lanes, or emergency-access routes. ▶ Designate the campus driveways that would serve as the principal entrances and exits during stadium events, maintain internal connections among campus parking areas, provide signs indicating when parking areas are full, and establish procedures for managing concentrated post-event departures. ▶ Following the first highly attended nighttime event, review the effectiveness of the Event Transportation Management Plan and revise it as necessary to address observed parking, pedestrian, bicycle, vehicle-circulation, queuing, or emergency-access conditions. Specifically, have monitoring to observe for any exceedances of queueing lengths at the identified project area intersections (i.e., Saverien Drive and Fair Oaks Boulevard, American River Drive and Saverien Drive, or along American River Drive at the westernmost and easternmost campus driveway entrances) that extend into or obstruct a through travel lane, bicycle facility, pedestrian crossing, driveway, or other conflicting transportation facility, as well as to direct and observe for appropriate use of available pedestrian crossings. If traffic congestion results in queuing exceedances, the Transportation Management Plan will be reviewed and revised to increase parking lot personnel directing traffic to appropriate parking, including consideration of hired third-party traffic management personnel. If instances of pedestrian crossings outside of available marked crosswalks, this will be noted and additional crossing personnel engaged at high-capacity events to direct appropriate pedestrian crossing. Mitigation Measure 4.4-3c: High-Capacity Event Access and Circulation Management To promote efficient event access and circulation, the following access and circulation management measures shall be implemented for events anticipated to approach or exceed available on-site parking capacity: ▶ The intersection of American River Drive and Saverien Drive should serve as the main entrance and exit for attendees using on-site parking. The entryway immediately west of this intersection should be closed to minimize conflict points. ▶ The intersection of American River Drive and the westernmost Rio Americano High School Driveway access should remain open for attendees and signage should be used to direct attendees to Parking Lot 2 and guide them from Parking Lot 2 to Raider Stadium.	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		► The intersection of American River Drive and the easternmost Rio Americano High School Driveway access should also function as a secondary entry and exit for attendees. The two access points between Parking Lots 4 and 5 should remain open to facilitate traffic flow, especially in the event of overflow parking.	
Transportation and Circulation Impact 4.4-4: Result in inadequate emergency access?	Construction: LTS Operational: PS	Implement Mitigation Measures 4.4-3a and 4.4-3b (above)	LTS
Tribal Cultural Resources Impact 4.5-1: 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). 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.	PS	Mitigation Measure 4.5-1a: Implement Cultural Awareness and Sensitivity Training. San Juan Unified School District (the District) shall require Tribal Cultural Awareness and Sensitivity Training (training) for all personnel involved in ground-disturbing construction work, including field consultants and construction workers. The District shall use the Cultural Awareness information shared by representatives of the United Auburn Indian Community (UAIC) as a part of the training. The training shall be conducted before any project-related ground-disturbing construction activities begin at the project site. The training will include relevant information regarding sensitive cultural resources and tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The training will also describe appropriate avoidance and impact minimization measures for cultural resources and tribal cultural resources that could be located at the project site and will outline what to do and who to contact if any potential cultural resources or tribal cultural resources are encountered. The training will emphasize the requirement for confidentiality and culturally appropriate treatment of any discovery of significance to Native Americans and will discuss appropriate behaviors and responsive actions, consistent with Native American tribal values. The training may be done in coordination with the project archaeologist. All ground-disturbing equipment operators shall be required to receive the training and sign a form that acknowledges receipt of the training.	LTS

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		Mitigation Measure 4.5-1b: Avoid Impacts in the Case of Unanticipated Discoveries. If any suspected tribal cultural resources or resources of cultural significance to the United Auburn Indian Community, including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. The San Juan Unified School District (the District) or contractor shall notify all consulting tribes of the unanticipated find. Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist. The District or contractor shall notify a representative of the United Auburn Indian Community (UAIC) immediately, and the Tribal Representative in coordination with the District shall determine if the find is a Tribal Cultural Resource (TCR) (PRC §21074) and the Tribal Representative shall make recommendations for further evaluation and treatment as necessary, subject to agreement between the Tribe and the District. <i>Treatment and Documentation:</i> If the unanticipated find is determined to be a tribal cultural resource according to the determination made by the UAIC, the UAIC shall provide a recommendation within one week to the District on the on-site boundaries of the new TCR and, if feasible, identify appropriate preservation in place and avoidance measures, including redesign or adjustments to the existing construction process, and long-term management. The District shall share the UAIC recommendation with all consulting tribes. If avoidance is infeasible, the UAIC shall within one week recommend a feasible reburial location in proximity of the find where no future disturbance is anticipated. Permanent curation of TCRs will not take place unless approved in writing by the UAIC. The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Representatives shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored.	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		The District and construction contractor(s) shall facilitate the respectful reburial of the culturally sensitive soils or objects. This includes providing a reburial location that is consistent with the Tribe's preferences, excavation of the reburial location, and assisting with the reburial, if feasible, upon request. Any discoveries shall be documented on a Department of Parks and Recreation (DPR) 523 form within 2 weeks of the discovery and submitted to the appropriate California Historical Resources Information System center in a timely manner. Work at the TCR discovery location shall not resume until authorization is granted by the District in coordination with the UAIC. If articulated or disarticulated human remains, or human remains in any state of decomposition or skeletal completeness are discovered during construction activities, the County Coroner and the UAIC shall be contacted immediately. Upon determination by the County Coroner that the find is Native American in origin, the Native American Heritage Commission will assign the Most Likely Descendent who will work with the District to define appropriate treatment and disposition of the burials. Mitigation Measure 4.5-1c: Notification and Invitation to Monitoring. The District or their construction contractor shall comply with the following measure to assist with identification of TCRs at the earliest possible time during project-related earthmoving activities: The District or contractor shall contact the UAIC Tribal Historic Preservation Officer (thpo@auburnrancheria.com) at least 1 month prior to the initial project ground-disturbing activities, if feasible, to offer to retain the professional services of a for on-site monitoring during initial ground-disturbing activities UAIC Certified Tribal Monitor(s). The duration of the construction schedule and Tribal Monitoring shall be determined at this time. If the UAIC THPO recommends monitoring, contracted Tribal Monitor(s) shall monitor the vegetation grubbing, stripping, grading, trenching, and other ground-disturbing activities required for installation of the new light poles and trenching to install conduit for the light poles and along the pedestrian egress area, or other ground disturbing activities as agreed upon by the District and the Tribe. UAIC Tribal Monitors or Tribal Representatives shall have the authority to direct that work be temporarily paused, diverted, or slowed within 100 feet of the immediate impact area if sites, cultural soils, or objects of potential significance are identified. The temporary pause/diversion shall be of an adequate duration for the Tribal Representative to examine the resource, up to one work day or the applicable legal timeline.	

Impacts	Significance before Mitigation	Mitigation Measures	Significance after Mitigation
		Appropriate treatment of TCRs shall be determined consistent with Mitigation Measure 4.5-1b. To track the implementation of this measure, the Tribal Monitor(s) shall document field monitoring activities on a Tribal Monitor log. Any on-site Tribal Monitor(s) shall abide by safety protocols required by the contractor while on the construction site. The Tribal Monitor, in consultation with the UAIC THPO and the District shall determine a mutual end or reduction to the on-site monitoring if/when construction activities have a low potential for impacting Tribal Cultural Resources. Monitoring will be limited to ground-disturbing activities. In the event the Tribal Monitor does not report to the job site at the scheduled time after receiving 24-hour business day notice, construction activities may proceed without tribal monitoring. At no time, regardless of the presence or absence of a Tribal Monitor, shall suspected TCRs be mishandled or disrespected. The Tribe shall notify the District of, and the District shall offer to resolve any disagreement between the contractor and the Tribal Monitor if such occurs on the project.	
Utilities and Service Systems	LTS	None	LTS
Wildland Fire Hazards	NI	None	NI

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2 INTRODUCTION

2.1 PURPOSE AND SCOPE

This Environmental Impact Report (EIR) evaluates the impacts of the Rio Americano High School Improvements project (the proposed project) as required by the California Environmental Quality Act (CEQA) of 1970 (Public Resources Code Section 21000 *et seq.*) and the CEQA Guidelines (California Code of Regulations [CCR], Title 14, Section 15000 *et seq.*).

The San Juan Unified School District (District), as the CEQA lead agency, has prepared this EIR to evaluate the environmental impacts of implementing the proposed improvements at the existing Raider Stadium and pedestrian pathway of Rio Americano High School. The CEQA Guidelines charge public agencies with the responsibility of avoiding or minimizing environmental damage that could result from implementation of a project, where feasible. As part of this responsibility, public agencies are required to balance various public objectives, including economic, environmental, and social issues.

To move forward with the proposed project, the District must prepare and certify an EIR that analyzes the potential environmental impacts of the proposed project; identifies feasible mitigation measures that could avoid or minimize significant environmental impacts (where necessary); describes and analyzes feasible alternatives; adopt findings with regard each significant effect; adopt a Statement of Overriding Considerations for all environmental impacts that cannot be mitigated to a less-than-significant level, if applicable; and adopt a Mitigation Monitoring and Reporting Program to ensure that all required mitigation measures are implemented.

2.2 ENVIRONMENTAL REVIEW PROCESS

The purpose of an EIR is not to recommend approval or denial of a project. An EIR is an informational document used in the planning and decision-making process by the lead agency and responsible and trustee agencies. An EIR describes the significant environmental impacts of a project, identifies potentially feasible measures to mitigate significant impacts, and describes potentially feasible alternatives to the project that can reduce or avoid significant environmental effects. CEQA requires decision-makers to balance the benefits of a project against its environmental effects in deciding whether to carry out a project.

A Notice of Preparation (NOP) for this Draft EIR was circulated to inform agencies and the general public that an EIR was being prepared and invite comments on the scope and content of the document. The NOP included a link to the Initial Study prepared for the proposed project, available on the District website. The District considered comments submitted in response to the NOP during preparation of this Draft EIR.

The Draft EIR is being circulated for a 45-day public review period, during which public comment and input from agencies and organizations is welcomed. At the close of the public review period, the District will prepare a Final EIR that will include copies of any comments submitted on the Draft EIR, responses to the comments, and any changes to the text of the Draft EIR.

If significant environmental effects are identified, the San Juan Unified School District Board of Education will adopt “findings” indicating whether feasible mitigation measures or alternatives exist that can avoid or reduce those effects. If the environmental impacts are identified as significant and unavoidable, San Juan Unified School

District Board of Education may still approve the project if it determines that social, economic, legal, technological, or other factors override the unavoidable impacts. The San Juan Unified School District Board of Education will then be required to prepare a “Statement of Overriding Considerations” that discusses the specific reasons for approving the project, based on information in the EIR and other information in the record. In making its decision whether or not to approve the project, San Juan Unified School District Board of Education will consider “the whole of record,” which includes the information in the Draft EIR, comments received on the Draft EIR and responses to those comments, and the Final EIR.

2.2.1 NOTICE OF PREPARATION AND SCOPING

To initiate preparation of this EIR, in accordance with the CEQA Guidelines (14 CCR 15082[a], 15103, and 15375), the District circulated an NOP for the proposed project (see the District’s website for more details: <http://www.sanjuan.edu/riostadium>). The NOP was circulated to the public; State Clearinghouse; responsible, trustee, and other relevant local, State, and Federal agencies; and to the Sacramento County Clerk. The scoping period began on January 6, 2026, and ended on February 5, 2026.

CEQA provides for a lead agency to facilitate one or more scoping meetings, which provide opportunity for determining the scope and content of the EIR. The District hosted one scoping meeting to provide opportunities to learn about the project and provide input during the NOP comment period. The public scoping meeting was held on January 7, 2026.

The NOP and scoping meeting provided opportunity for comment from public agencies, stakeholders, organizations, and interested individuals on the scope of the environmental analysis addressing the potential effects of the proposed project (see <http://www.sanjuan.edu/riostadium>). The District reviewed and considered all scoping comments in preparing this Draft EIR.

WRITTEN COMMENTS

Written comments or questions concerning this Draft EIR must be submitted within the 45-day review period. When submitting a comment, please include the name of a contact person in your agency or organization. Responsible and trustee agencies should focus their comments on environmental information germane to each agency’s statutory responsibility (CEQA Guidelines Section 15204[d]). All comments must be directed to the name and address listed below, either via postal mail or email:

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

A copy of the Draft EIR is also available for review on the District’s website at:
<http://www.sanjuan.edu/riostadium>.

2.3 ORGANIZATION AND CONTENT OF THIS DRAFT EIR

This Draft EIR is organized as follows:

- ▶ **Chapter 1, “Executive Summary,”** provides an overview of the findings, conclusions, and any recommended mitigation measures in the Draft EIR.
- ▶ **Chapter 2, “Introduction,”** describes the intended uses and purposes of this Draft EIR; environmental review process; issues to be resolved and areas of controversy; lead, responsible, and trustee agencies; public involvement process; and Draft EIR organization.
- ▶ **Chapter 3, “Project Description,”** describes the project location, project characteristics, supporting infrastructure, project schedule, required approvals and entitlements, and project objectives.
- ▶ **Chapter 4, “Environmental Impact Analysis,”** evaluates the physical environmental effects of the project and identifies mitigation for potentially significant and significant effects.
- ▶ **Chapter 5, “Effects Found to be Less than Significant,”** evaluates the physical environmental effects of the project and identifies no impact, less than significant effects, and impacts mitigated to less than significant.
- ▶ **Chapter 6, “Alternatives,”** provides a comparative analysis between the project and alternatives to the project. The Alternatives chapter provides a summary of the relative environmental impacts of the project alternatives, including the No Project Alternative. This chapter also identifies the “environmentally superior” alternative.
- ▶ **Chapter 7, “Cumulative Impacts and Other CEQA Considerations,”** describes the impacts of implementing the project in combination with the impacts of related past, present, and reasonably foreseeable future projects. Other CEQA Considerations discusses the Project’s growth inducement potential, any significant irreversible environmental changes associated with the project, any significant and unavoidable effects of the project, and Mandatory Findings of Significance.
- ▶ **Chapter 8, “References,”** lists the sources of information cited throughout the Draft EIR.
- ▶ **Chapter 9, “List of Preparers,”** lists the individuals who contributed to preparation of the Draft EIR.
- ▶ **Chapter 10, “Acronyms”**
- ▶ **Appendices** provide background and technical information and are available on the District website: sanjuan.edu/riostadium

2.4 REQUIRED APPROVALS

In accordance with the CEQA Guidelines Section 15051(b)(1), the District is the lead agency with primary authority for approval of the project. The San Juan Unified School District Board of Education will consider the information contained in this EIR as a part of the evaluation of the project. Responsible and other agencies may also use the EIR for their own approvals associated with the proposed project.

The Division of the State Architect provides design and construction oversight for K–12 schools, community colleges, and various other state-owned and leased buildings.

Approvals for the project include, but are not limited to:

- ▶ San Juan Unified School District Board of Education certification of the EIR and adoption of a Mitigation Monitoring and Reporting Program; and
- ▶ San Juan Unified School District Board of Education adoption of the Rio Americano High School Stadium Improvements project.

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

- ▶ Project design shall be reviewed by the Division of the State Architect.

3 PROJECT DESCRIPTION

3.1 PROJECT LOCATION AND SURROUNDING LAND USES

3.1.1 REGIONAL AND LOCAL PROJECT LOCATION

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 3-1). Most of the campus would not be affected by the proposed improvements. The new bleachers and field lighting are proposed in the same vicinity as the existing bleachers and portable lights. New pedestrian safety lighting is proposed along paved pedestrian access routes and a fire lane.

The Rio Americano campus is 41.52 acres in total land area, with approximately 157,402 square feet of building floor space comprised of 18 buildings and 7 portable classrooms. Outdoor sports facilities include two baseball fields, two softball fields, a soccer field, tennis courts, swimming pool and diving pool, basketball courts, and the stadium. The existing Raider Stadium 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 system. Bleacher seating is available at the 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. Raider Stadium is situated in the southeastern corner of the school campus (Exhibit 3-2).

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.

3.1.2 PROJECT BACKGROUND

Rio Americano High School is a public school with a total enrollment of 1,930 students (grades 9 through 12) for the 2025-2026 school year (California Department of Education 2026). 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.

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. 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.



Exhibit 3-1. Regional Project Location



Exhibit 3-2. Project Site

3.1.3 EXISTING AND SURROUNDING LAND USES AND ZONING

Land surrounding the project site to the east, west, and north is developed with single-family residences. 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). Public schools are a primary, permitted use in areas that are zoned residential under the Sacramento County Zoning Code (Sacramento County 2025: Table 3.1).

The school campus is separated from the American River Parkway to the south by an 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. Under Sacramento County Zoning Code Section 2.3, the Parkway Corridor (PC) is a combining zoning district designed to limit uses that visually impact the American River Parkway and ensure safety for developments occurring near the tops of river bluffs (Sacramento County Zoning Code Section 2.3.2).

3.2 PROPOSED PROJECT CHARACTERISTICS

3.2.1 PROJECT COMPONENTS

The proposed project consists of improvements to the existing Rio Americano facilities, including installation of new high-mast light standards, removal of existing bleachers and installation of new and expanded bleacher seating, an upgraded public address 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 pedestrian safety.

The high-mast light standards would be installed to light the field, and would replace the current field lighting provided by portable diesel-powered lights, which are not designed to focus light on the field of play or shield lighting to avoid glare. Proposed project lighting would provide lighting that is designed as sports lighting to focus light on the field of play. The project proposes four light standards, two on each side of the field (north and south), and each would be 80 feet tall. These would replace existing use of 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 (at the campus entrance from American River Drive at Saverien Drive) and the field, 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 up to approximately 2,575 people. Visitor bleachers would rise 7 feet and 2 inches with an additional 3-foot and 8-inch flat rise board at the back of the topmost row. Home bleachers would rise 21 feet and 6 inches with an additional 5-foot flat rise board at the back of the topmost row. A new press box would also be installed atop and central to the bleacher seating on the south (home side) of the stadium; the press box would be 30 feet wide and would replacing a portion of the topmost bleachers in this area; this portion of the bleachers would rise 20 feet and 4 inches with an additional 9-foot- and 7-inch-tall press box topped with a 4-foot-tall by 18-foot-wide roof railing and riser boards at the center of press box. Two existing Sacramento Metropolitan Utility District (SMUD) wood light poles within the campus fire lane (which would be used for pedestrian ingress and egress) would also be removed. Finally, the existing public address system would be upgraded. See Exhibit 3-3 for the project's preliminary site plan for proposed improvements at the Raider Stadium.



① HOME BLEACHERS -
1,863 SEATING CAPACITY
229'-6" L x 40'-6" W x 21'-6" H
(BASIS OF DESIGN)

② SPORTS FIELD LIGHTS
80'-0" H (BASIS OF DESIGN)

③ VISITOR BLEACHERS -
712 SEATING CAPACITY
175'-6" L x 19'-1" W x 7'-2" H
(BASIS OF DESIGN)

④ NEW HARDSCAPE

⑤ PA SOUND SYSTEM
LOCATION TBD

⑥ PRESS BOX
30'-0" L x 8'-0" W x 13'-7" H
(BASIS OF DESIGN)

⑦ EGRESS PATHWAY
LIGHT POLES 15'-0" H
LOCATED OUTSIDE STADIUM
(BASIS OF DESIGN)



DRAFT
RIO AMERICANO HIGH SCHOOL
BLEACHERS AND STADIUM LIGHTS



Exhibit 3-3. Proposed Project Improvement Areas

Each light pole would be installed on a pre-cast base. The number of luminaires (lighting fixtures) on each lighting pole would range from one to eight, with a total of 13 luminaires for the stadium lights and three luminaires for the pedestrian access lights. All luminaires would be mounted at varying heights, ranging from 16 to 80 feet above grade. This would include two ‘ball tracker’ fixtures at 16 feet on each pole, which would be used only during football games to allow for visibility of the ball. The total energy load under maximum lighting capacity would be 59.60 kilowatts. When the lighting system is in use, assuming 4 hours of use for a nighttime game event, the daily electricity consumption would be up to 240 kilowatt hours.

The proposed lighting system would be new LED light fixture technology, designed by Musco Lighting, to meet the following design criteria:

- ▶ Utilize a relatively 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.
- ▶ Design system to meet the strict guidelines set by the International Dark-Sky Association (IDA) to avoid glare and skyglow.

3.2.2 OPERATIONS PLAN

The District would employ Night Event Management Standards that would be used in conjunction with the high school’s existing standard operations, policies, and procedures governed by the school’s Safety Team, Athletic Department, and California Interscholastic Federation (CIF), including the CIF Game Management Guidelines. The guidelines contain procedures for visiting schools regarding conduct expectations, duties of volunteers assigned to these events, management of on- and off-site parking, and operation of the sound system.

3.2.3 SCHEDULE OF USES

The track and field facility is currently used by the Rio Americano High School athletic program including football, flag football, lacrosse, soccer, and track & field. The track and field facility is also used occasionally for other school events such as assemblies and field days.

The existing Raider Stadium includes limited seating (up to 288 people), a public address system, and portable diesel-powered lights, all of which support existing sports practices and games, primarily in the daytime hours and some limited evening events with use of the portable lights. 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.

The proposed project would allow several sports teams (including football, flag football, soccer, lacrosse, and track and field), which currently hold practices and games during weekday afternoons and on Saturdays due to a lack of lighting, to schedule practices and games in the late afternoon and evening. Existing practice use of the field can be daily. Home games making existing use of Raider Stadium can range from once to several days per week depending on the sports season, for a total of approximately 40 days throughout the school year, primarily from late August through April; these events draw smaller crowds of approximately 50 to 120 attendees and make

limited use of the public address system. Both practices and games make some use of existing portable diesel-powered lights for those games that extend into the evening hours. The proposed project would not increase the scale of use of the stadium for these existing activities, but would allow for increased scheduling flexibility, including adjusting for high-heat days when shifting practices to the cooler hours of the evening would be beneficial for athletes. Home varsity football games, which are currently hosted off-site at El Camino High School, would instead be hosted at Raider Stadium with implementation of the proposed project. Home varsity football games would be hosted five to eight times per year, depending on the league schedule and whether playoff games occur. Based on historical ticket counts, game attendance has typically ranged from 1,100 to 3,400 plus staff, coaches, and players at the home games hosted at El Camino High School over the past two seasons; the peak attendance of 3,400 occurred at a single game, whereas the average attendance of all other games is approximately 1,400. Hosting home football games at the school's own Raider Stadium could potentially increase the average attendance at some of the five to eight home games per season, but not likely approaching the peak attendance level. As a result of the increased seating, the proposed project would also allow for the school to host improved whole-school assemblies during or immediately following school hours due to the proposed additional seating, graduation ceremonies (which are currently hosted off-campus), and other community events. Where there is no precise proposed schedule for such activities, it is reasonable to assume that such would occur once monthly on average. 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.

Table 3-1 provides a summary of the existing and anticipated uses of the stadium with implementation of the proposed project. No uses of the stadium are proposed before sunrise.

The proposed field lighting would be used on select evenings to accommodate athletic practices and competitions during the winter months when the sun sets early, as well as select fall and spring events that run later into the evening or are shifted into the evening to avoid peak heat hours. Sunset in the Sacramento area ranges from as early as approximately 4:45 P.M. in December to as late as approximately 8:30 P.M. in late June and early July (National Oceanic and Atmospheric Administration [NOAA] Sunrise/Sunset Calculator for the year 2026). 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 8:00 P.M. Most athletic games would end by 9:00 P.M., except for football, which would usually end by or before 10:00 P.M. but no later than 11:00 P.M. After events, lighting would potentially remain on at reduced levels to facilitate safe crowd exiting and for clean-up and other similar activities after game completion; this typically would occur for 30 minutes after the end of each event.

The estimated attendance for athletic competitions and other events upon implementation of the proposed project would vary by activity and other factors, such as level of competition (regular season vs. 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 would allow for the currently off-site football games to be held at the Raider Stadium, as well as allow for a shift of the timing of some events that could be held later in the evening, to accommodate both cooler temperatures and starting afternoon games slightly later to limit interruption with the academic school hours. The peak football game attendance over the past two seasons was approximately 3,400; this occurred one time, while all other games attracted between approximately 1,100 and 1,700. Other

sporting events currently attract less than 200 spectators. Graduation is held once annually at an off-site location and includes approximately 480 graduating students and 920 family and friend attendees per tickets available on a per-student basis; under the proposed project, this event could be hosted at Rio Americano High School once per year in June, and would not be anticipated to increase in attendance. The attendance at sporting events is not anticipated to increase, with the exception of football games for which there could be an increase in attendance due to increased ease of access for students that may stay on campus or can more easily access the event due to proximity to home; other sporting events do not currently reach the capacity of the existing bleachers at Raider Stadium. The estimated attendance for each event at the stadium under current and future with proposed project conditions is shown in Table 3-1.

3.3 PROJECT CONSTRUCTION ACTIVITIES

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

Installation of the new 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. Minor trenching would be required to install conduit and wire from the existing 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 egress light poles would be raised by a crane bolted to the pole bases. Light fixtures would be attached to the new egress lighting poles on the ground in the staging area and erected with the poles.

The existing metal bleachers would be removed, and new 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 public address system would involve removal of existing components, installation of new wiring and conduit, mounting of new speakers, 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.

Table 3-1. Existing and Future (with proposed Project) Stadium Events

Field Use Activity (games, practice, playoffs, assemblies, etc.)	Month(s) of the Year that the Activity Takes Place	Existing Conditions Number of Days Activity Occurs On-Site	With Proposed Project - Number of Days Activity Occurs On-Site	Average Estimated Attendance per event	Amplified Sound (yes or no)
Games – Football	August through November	0	5 to 8	1,500 to 3,400	No, except for senior celebration currently. Yes with proposed project.
Games – Flag Football	August through November	8	8	80-100	None, except for senior celebration
Games – Lacrosse	March through April	16	16	40-50	None, except for senior celebration
Games – Soccer	December through February	16	16	60-120	None, except for senior celebration
Meets – Track and Field	March through May	0	0	Not hosted at Rio Americano High School	No
Practice – Football	March - June, July-November	20 to 24	20 to 24	Players and Coaching Staff Only	No
Practice – Flag Football	April - June, July-November	20 to 24	20 to 24	Players and Coaching Staff Only	No
Practice – Lacrosse	September-January, February-May	15 to 20	15 to 20	Players and Coaching Staff Only	No
Practice – Soccer	November - February	18 to 20	18 to 20	Players and Coaching Staff Only	No
Practice – Track and Field	February through May	20 to 24	20 to 24	Players and Coaching Staff Only	No
Graduation	June	0	1	3,500	Yes
Field Days	August through June	Up to 4	Up to 4	1,500 to 3,000	Yes
School Assemblies or Other School-Sanctioned Community Events	August through June	0	Up to 4	1,500 to 3,000	Yes

Source: San Juan Unified School District 2026

The equipment types required for construction would include: concrete saw, dozer, crane, auger, backhoe, drill rig, forklift, generator, welder, paver, and roller. The number of construction crew on site is estimated to be 20. Construction hours would be between 7:00 A.M. and 4:00 P.M. 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, beginning 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. The construction contractor would be responsible for recycling construction 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 track and field facility. Existing on-site equipment storage containers would continue to be required and are not a part of the proposed project. No tree removal would be required for demolition or construction of any proposed project components.

3.4 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.

3.5 PROJECT ENVIRONMENTAL IMPACT AVOIDANCE AND MINIMIZATION MEASURES

The District will require implementation of the following tree impact avoidance measures as a part of the contract(s) to improve the Raider Stadium facilities. All native trees, as identified by a qualified biologist, 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.

3.6 REQUIRED PROJECT APPROVALS

In accordance with the CEQA Guidelines Section 15051(b)(1), the District is the lead agency with primary authority for approval of the project. The San Juan Unified School District Board of Education will consider the information contained in this EIR as a part of the evaluation of the project. Responsible and other agencies may also use the EIR for their own approvals associated with the proposed project.

The Division of the State Architect provides design and construction oversight for K–12 schools, community colleges, and various other state-owned and leased buildings.

Approvals for the project include, but are not limited to:

- San Juan Unified School District Board of Education certification of the EIR and adoption of a Mitigation Monitoring and Reporting Program; and

- ▶ San Juan Unified School District Board of Education adoption of the Rio Americano High School Stadium Improvements project.

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

- ▶ Project design shall be reviewed by the Division of the State Architect.

4 ENVIRONMENTAL IMPACT ANALYSIS

4.0 APPROACH TO THE ANALYSIS

4.0.1 INTRODUCTION

Consistent with the CEQA Guidelines Section 15126.2, Chapter 4 of this EIR is focused on an evaluation of topic areas where significant impacts on the physical environment associated with the proposed Rio Americano High School Stadium Improvements project may occur, and identifies feasible mitigation for those impacts, where necessary. These topic areas consist of the following: aesthetics, biological resources, noise and vibration, transportation and circulation, and tribal cultural resources. Chapter 5 of this EIR contains brief discussion, at a lesser level of detail, of topic areas where impacts on the physical environment from implementing the proposed project are clearly less than significant, mitigated to less than significant, or no impact would occur. The following topic areas are discussed in Chapter 5: agriculture and forestry resources, air quality, cultural resources, energy, geology and soils and paleontological resources, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, mineral resources, population and housing, public services, recreation, utilities and service systems, and wildfire hazards.

The following discussion addresses the affected environment, regulatory background, environmental consequences, and mitigation measures for each of the environmental issue areas in Chapter 3; and explains the terminology used in the analysis in Chapters 3 and 4. The reader is referred to the individual topic area sections regarding specific assumptions, methodology, and significance criteria (thresholds of significance) used in the analysis and determination of significance of impacts.

4.0.2 FORMAT AND CONTENT

Topic area analyses in Sections 4.1 through 4.5 are organized in the following format:

1. The **Environmental Setting** subsection provides an overview of the current (2025) baseline physical environmental conditions (i.e., the environmental baseline), in accordance with the CEQA Guidelines (14 CCR Section 15125[a][1]).
2. The **Regulatory Setting** subsection identifies the plans, policies, laws, regulations, and ordinances that are relevant to each topical section based on current (2025) conditions.
3. The **Environmental Impacts and Mitigation Measures** subsection identifies the adverse physical environmental impacts of the proposed redevelopment of the existing school campus in accordance with the CEQA Guidelines (CCR Sections 15125 and 15143). This subsection is organized as follows:
 - The **Thresholds of Significance** provide criteria established by the District to define at what level an impact would be considered significant in accordance with CEQA. Thresholds may be quantitative or qualitative; they may be based on examples found in CEQA regulations or the CEQA Guidelines; scientific and factual data relative to the District's jurisdiction; legislative or regulatory performance standards of federal, state, regional, or local agencies relevant to the impact analysis; or other factors. Generally, however, the thresholds of significance used are derived from Appendix G of the CEQA

Guidelines, as amended; factual or scientific information and data; and applicable regulatory standards of federal, state, regional, and local agencies.

- The **Impact Analysis** describes potential adverse physical environmental effects associated with implementation of the proposed redevelopment of the existing school campus. The Impact Analysis specifies why impacts are found to be significant and unavoidable, significant or potentially significant, or less than significant, or why there is no environmental impact, based on the identified thresholds of significance. The impacts are listed numerically and sequentially throughout each section.
- **Mitigation Measures** to avoid, minimize, rectify, reduce, or compensate for significant and potentially significant impacts of the proposed project, in accordance with the CEQA Guidelines (14 CCR Sections 15370, 15002[a][3], 15021[a][2], and 15091[a][1]), where feasible, are recommended for each significant and potentially significant impact. If implementation of feasible mitigation measures is not sufficient to reduce an impact to a “less-than-significant” level, or no feasible mitigation measures are available, the impacts are described as “significant and unavoidable.”

4.0.3 TERMINOLOGY USED TO DESCRIBE IMPACTS

IMPACT LEVELS

This EIR uses the following terminology to denote the significance of each identified environmental impact in Chapters 4 and 5.

- ▶ **No impact** indicates that the construction, operation, and maintenance of the project would not have any direct or indirect effects on the environment. It means no change from existing conditions. This impact level does not need mitigation.
- ▶ A **less-than-significant impact** is one that would not result in a substantial or potentially substantial adverse change in the physical environment. This impact level does not require mitigation, even if feasible, under CEQA.
- ▶ A **significant impact** is defined by CEQA Section 21068 as one that would cause “a substantial, or potentially substantial, adverse change in any of the physical conditions within the area affected by the project.” Levels of significance can vary by project, based on the change in the existing physical condition. Under CEQA, mitigation measures or alternatives to the proposed project must be provided, where feasible, to reduce the magnitude of significant impacts.
- ▶ A **potentially significant impact** is one that, if it were to occur, would be considered a significant impact as described above before the application of mitigation. For CEQA purposes, a potentially significant impact is treated as if it were a significant impact.
- ▶ A **significant and unavoidable impact** is one that would result in a substantial or potentially substantial adverse effect on the environment, and that could not be reduced to a less-than-significant level even with any feasible mitigation. Under CEQA, a project with significant and unavoidable impacts may proceed, but the lead agency is required to prepare a “statement of overriding considerations” in accordance with CEQA Guidelines Section 15093, explaining why specific economic, legal, social, technological, or other benefits,

including region-wide or statewide environmental benefits, of a proposed project outweigh the unavoidable adverse environmental effects.

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4.1 AESTHETICS

4.1.1 ENVIRONMENTAL SETTING

VISUAL RESOURCE EVALUATION CONCEPTS

Aesthetics or visual resources impacts are generally defined in terms of a project's physical characteristics and potential visibility, and the extent to which the presence of a proposed project would change the perceived visual character and quality of the physical environment in which it would be located. Both natural and created features in a landscape contribute to its visual character. Landscape characteristics influencing visual character include geologic, hydrologic, botanical, wildlife, recreation, and urban features.

In addition to visual character, the overall visual experience also encompasses viewer response, including viewer exposure and sensitivity. Landscape elements are considered higher or lower in visual importance based on their proximity to the viewer. Generally, the closer a resource is to the viewer, the more dominant, and therefore visually important, it is to the viewer.

The primary public viewpoints of the project site are from the perspective of pedestrians and cyclists using the sidewalks and bicycle lanes along American River Drive, from vehicles on American River Drive, and from the perspective of recreationists on the Jedediah Smith Memorial Trail and the paved access road along the crown of the north bank American River flood protection levee.

EXISTING VISUAL RESOURCES

The description of the visual character of the project site includes a description of the relevant key observation points (KOPs) and photographs from each KOP showing the existing conditions. Exhibit 4.1-1 shows the location of each of the key viewpoints. Existing light and glare at the project site and the surrounding area are also briefly described. The subsection below titled "Impact Analysis" includes visual simulations showing the proposed condition at the project site with the inclusion of the proposed nighttime lighting as viewed from various locations.

EXISTING VISUAL CHARACTER

Project Site

The project site consists of the eastern half of the Rio Americano High School campus, which is comprised of the existing playing field, track, and bleachers, several small storage buildings adjacent to the bleachers, the main parking area adjacent to American River Drive (staging area), and the paved fire lane that provides access from the main parking area to the track and field area. The site was originally developed as a school in 1963. Bleacher seating and small upgrades were installed in 2006, and the current modernized and improved track and field was completed in 2019. The project site and surrounding area to the east, north, and west are flat. Chain-link fencing bordering the school's southern and eastern property boundaries is visible, along with off-site wood fencing and residences to the east. To the south, there is a line of tall landscape trees along the campus property boundary. The southern side of the project site is bordered by the elevated flood protection levee along the north bank of the American River, which is composed of a tall earthen berm covered with grasses on the sides, and a narrow paved access road for levee maintenance vehicles on the levee crown.



Source: AECOM 2026

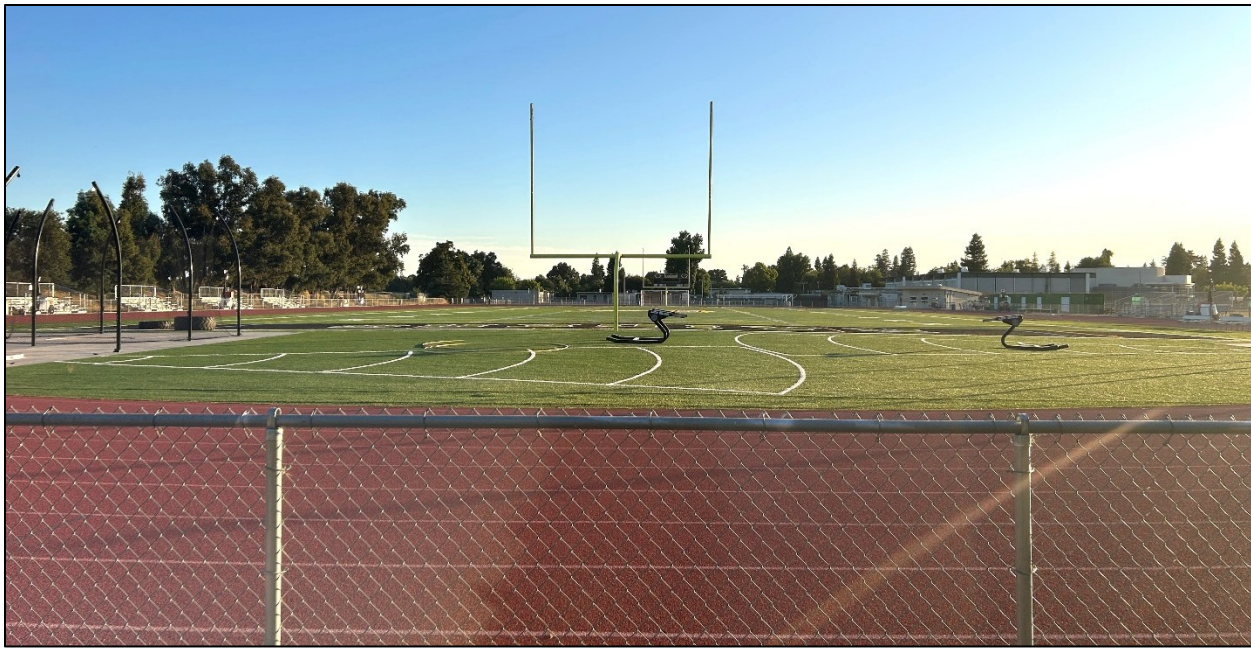
Exhibit 4.1-1 Key Observation Points

The four proposed light standards would be installed in existing paved areas immediately adjacent to the adjacent track, field, and bleachers: two on the north side and two on the south side. The viewshed in this area is dominated by the height and silver/grey color of the existing metal bleacher seating, which runs parallel to the long sides of the oval track and infield. The bleachers present a strong horizontal, elevated element in the landscape. The flat track on the ground inside the bleachers is composed of an all-weather surface that is red in color, while the infield is composed of contrasting green turf grass with white markings for football. Several small one-story buildings including a concession stand/restroom building and equipment storage buildings, flat paved walkways with grey asphalt, and flat paved outdoor gathering areas (also grey asphalt) surround the stadium.

A line of tall landscape trees, which are mostly evergreen eucalyptus species, is present outside the stadium proper but immediately adjacent along the southern property boundary. The surrounding green color and fine texture of the existing baseball and soccer fields immediately adjacent to and north of the stadium provide a visual contrast with the silver/grey color and coarse texture of the bleacher seating. The visual appearance of the stadium presents a high degree of cohesiveness and unity. A view of the existing stadium from within the high school campus is shown in KOP-1. The back side of bleacher seating at the stadium is visible in background views for pedestrians, cyclists, and motorists traveling along American River Drive during the winter (KOP-2); however, during the summer and early fall, a line of deciduous trees along the northern school property boundary blocks most views of the existing track and field area from the roadway.

Construction materials and equipment would be staged within the main campus parking area, which is south of American River Drive. A view of the proposed construction staging area from American River Drive, as well as the existing fire access lane where lighting improvements for pedestrian safety are proposed, are shown in KOP-3.

As noted above, the existing track and field includes limited seating (up to 288 people), a public address system, and portable diesel-powered lights, all of which support existing sports practices and games during the daytime and evening/nighttime hours. Views of the existing stadium during a nighttime soccer game in which portable diesel-powered lighting was used, are shown in KOPs 4 through 6, representative of existing evening use of the field.



Source: AECOM 2025

Photo Viewpoint KOP-1. View of Existing Track and Field Area from Eastern Campus Boundary. This view looking west from the eastern high school campus boundary shows the red all-weather track surface, green discus area and turf football field, yellow football goal posts, silver/grey bleacher seating on the south side of the project site, along with high school campus buildings and landscape trees in the background.



Source: Google Earth 2025

KOP-2. View of Existing Track and Field Area from American River Drive. This view looking south from American River Drive shows the eastern-most entrance gate to the main school parking area, green turf grass within the campus baseball fields, chain link fencing surrounding the baseball batting areas, and green fencing at the south end of the baseball fields. In the background, the back side of bleacher seating is visible, along with evergreen trees along the southeastern edge of the campus property boundary.



Source: Google Earth 2025

KOP-3. View of Construction Staging Area and Fire Access Lane from American River Drive. This view looking south from American River Drive shows landscape trees and turf grass on the campus in the foreground, the proposed construction staging area in the main school parking lot (middleground, right) and the fire access lane where lighting improvements are proposed (foreground, middleground and background, center). One of the campus baseball fields is also visible (background, left).



Source: AECOM 2025

Photo Viewpoint KOP-4. View of Existing Track and Field Area from Western Campus Boundary During a Night Game. This view looking east from the western high school campus boundary shows the red all-weather track surface, green discus area and turf football field, yellow football goal posts, silver/grey bleacher seating on the south side of the project site, along with existing lighting on the north and south sides of the track and field, and landscape trees on the south.



Source: AECOM 2025

Photo Viewpoint KOP-5. View of Existing Track and Field Area from Eastern Campus Boundary During a Night Game. This view looking west from the eastern high school campus boundary shows the green discus area and turf football field, yellow football goal posts, silver/grey bleacher seating on the south side of the project site, along with existing lighting on the north and south sides of the track and field, and landscape trees on the south.



Source: AECOM 2025

Photo Viewpoint KOP-6. Partial View of Existing Track and Field Area from Outside the Southern Campus Boundary Adjacent to the Levee During a Night Game. This view looking west from the southern high school campus boundary shows existing tree line that borders the high school boundary and the adjacent levee that separates the high school from the Parkway, as well as a partial view of the red all-weather track surface and the green discus area and turf football field in the background to the north.

Surrounding Land Uses

Residences surround the Rio Americano High School campus to the west, north, and east. The portion of the campus affected by the proposed project is in the southeastern portion of the campus, and therefore, residences to the north and west are buffered from the project site by parts of the campus that are not proposed for any improvements as a part of the project. The only public viewpoints of the project site are from pedestrians, cyclists, and motorists traveling on American River Drive (KOPs 2 and 3), and recreationists on the crown of the north bank American River levee (KOP 4).

The portion of the existing Rio Americano High School campus that is west of the project site consists of primarily large, block-style, grey and tan buildings, including classrooms, administration, gymnasium, cafeteria, etc. The campus includes landscaping consisting of green turf grass and tall, green deciduous and evergreen landscape trees. Paved parking areas with landscape trees and shrubs are present throughout the campus, with several paved roadways that provide access throughout the campus. The northern end of the campus is visible from American River Drive, but views are partially screened by a row of tall evergreen and deciduous trees along the northern property boundary.

Residences east of the project site along Whitehall Way back up to the existing stadium; distances to the property lines of residences range from approximately 15 feet to 200 feet for the six closest homes. Residences farther to the north along Whitehall Way are more than 200 feet from the stadium. All of the residences are separated from the campus by approximately 6-foot-tall wood fences that block ground-level views. All of the residences on properties along Whitehall Way are one-story buildings. Most of these residences have tall landscape trees (mixed evergreen and deciduous) and/or tall shrub hedges along the back of the properties adjacent to the high school campus' eastern property line; these trees and shrubs provide visual screening at substantial heights above the existing wood fence, particularly during the spring, summer, and fall months. Residents at the north end of Whitehall Way would not have views of the proposed construction staging area or the proposed pedestrian lighting between the existing parking lot and the stadium, approximately 725 feet to the west, due to the intervening solid wood fence.

Residences along the north side of American River Drive are approximately 925 feet from the existing stadium and have very limited views due the distance and the intervening landscape trees, baseball field fencing, and bleacher seating associated with one of the baseball fields and the north side of the existing track and field area. However, residents in homes on the north side of American River Drive would have some views of the construction staging area in the campus' main parking lot, and may have limited views of the north end of the proposed pedestrian lighting from the existing parking lot, partially screened by the row of landscape trees along the campus' northern property boundary.

Residences to the west of the high school campus along Morris Way are approximately 1,200 feet from the existing stadium and approximately 560 feet from the proposed staging area, and views of the existing stadium and the proposed construction staging area are completely blocked by the intervening campus buildings and tall landscape trees and shrubs.

American River Parkway

The Rio Americano High School campus, including the existing Raider Stadium, is separated from the American River Parkway (Parkway) by the north bank of the American River levee. Views of the campus from the

Parkway, including the Jedediah Smith Memorial Trail, are blocked by the elevated north bank American River levee, as shown in KOP-7.

This portion of the Parkway south of the Rio Americano High School campus is designated as the “Rio Americano Area” in the Parkway Plan. There is no vehicular access to the Rio Americano Area of the Parkway; access is limited to pedestrian and bicycles only from the crown of the adjacent north bank American River levee. Although the levee crown is technically not part of the Parkway, it is paved (for access by levee maintenance equipment) and is available for use by pedestrians and bicyclists. From the levee crown, partial views of Raider Stadium are available through the line of tall eucalyptus trees along the southeastern campus property boundary. The main campus parking area, which would serve as the proposed construction staging area, is not visible from the levee crown due to intervening buildings and landscape trees.

The proposed light standards at the Rio Americano High School stadium would be installed approximately 225–460 feet north of the Jedediah Smith Memorial Trail (at the closest points) within the Parkway. The existing view looking north towards Raider Stadium from the Jedediah Smith Memorial Trail at the Rio Americano Area Parkway access is shown in KOP-7.



Source: Google Earth 2016

Photo Viewpoint KOP-7. View of the Rio Americano Access to the American River Parkway, looking north from the Jedediah Smith Memorial Trail. The paved Rio Americano bicycle/pedestrian trail connector across the elevated north bank American River levee, and perennial grasses in the Parkway are visible in the foreground. The tall trees in the center-right of the photo are along the southeastern edge of the Rio Americano High School campus, immediately south of Raider Stadium. The tops of landscape trees among the buildings within the high school campus are visible in the left side of the photo.

As discussed in the American River Parkway Plan (Sacramento County 2008), the Rio Americano subarea within the Parkway comprises that portion of the Save the American River Association (SARA) Park area that is north of the river. The northern Parkway boundary within this subarea is adjacent to single-family residential

neighborhoods and the Rio Americano High School. As described in the Parkway Plan (Sacramento County 2008), the Rio Americano subarea on the north side of the American River is characterized predominantly by grassland. Occasional rest stops with picnic tables and trash cans are located along the river near the trails. Otherwise, the Rio Americano subarea in the vicinity of the project site is undeveloped and is designated by the Parkway Plan for “Limited Recreation.”

SCENIC HIGHWAYS

The California Department of Transportation (Caltrans) manages the State Scenic Highway Program and assists local communities seeking to officially designate state scenic highways. In addition, Sacramento County has designated certain roadway segments as scenic highways or scenic corridors as part of its General Plan.

There are no designated State or County scenic highways adjacent to or in the vicinity of the project site. The nearest State-designated highway is State Route 160 (River Road), approximately 10.5 miles to the southwest (Caltrans 2026). The nearest County-designated scenic highway is Garden Highway, approximately 8.5 miles west of the project site (Sacramento County 2022a).

LIGHT AND GLARE

The project site is in the urbanized area of Arden-Arcade, where nighttime lighting from development throughout Arden-Arcade, Carmichael, Rancho Cordova, and Sacramento creates existing skyglow. The school currently uses portable diesel-powered lights for select evening athletic activities. Nighttime security lighting is present throughout the Rio Americano High School campus in the form of building and parking lot lighting. Overhead light standards for street lights are present along American River Drive immediately north of the project site. Nighttime security lighting is also present at the surrounding single-family residences to the east, west, and north.

The Joint Illuminating Engineering Society (IES) and International Dark-Sky Association (IDA) Lighting Zones provide a standardized framework for describing existing nighttime ambient light conditions and establishing appropriate limits for outdoor lighting based on land use, ecological sensitivity, and nighttime activity levels. The lighting zone system is widely used in environmental review, lighting ordinances, and CEQA analysis. The zones range from LZ-0 (no ambient artificial light) to LZ-4 (high-intensity urban cores). As used in the Joint IDA-IES MLO, the lighting zones are defined with suggested uses as follows (IDA-IES 2011):

- ▶ **Z0: No Ambient Light.** Undeveloped areas with little to no human activity and where the natural nighttime environment is largely unaffected by artificial lighting. Artificial lighting at night has the potential to seriously disrupt the biological cycles of flora and fauna and detract from the human experience of natural darkness. The vision of human residents and users is adapted to the near-total darkness, and they expect little or no artificial lighting. Human activity is sparse and is subordinate in importance to the natural environment. Applied to areas in which permanent lighting is not expected and when used, is limited in the amount of light provided and the period of operation. LZ0 typically includes undeveloped areas of open space, wilderness parks and preserves, areas near astronomical observatories, or any other area where the protection of a dark environment is critical.
- ▶ **LZ1: Low Ambient Light.** Developed areas within a natural environment and areas of human activity that are inherently dark at night. Electric lighting at night could adversely affect the biological cycles of flora and fauna, or could interrupt the quiet, dark character of the area. The vision of human residents and users is

adapted to the low light levels, and they do not expect to see electric lighting except where necessary to improve visibility and safety. In these limited areas, low light levels are appropriate. Lighting is expected to be non-continuous (i.e., pools of light rather than uniform lighting along a path or roadway). Typically, areas with single- and two-family residences; rural town centers; business parks; and other commercial, industrial, or storage areas, typically with limited nighttime activity. It may also include the developed areas in parks and other natural settings.

- ▶ **LZ2: Moderate Ambient Light.** Areas of human activity (i.e., habitation, recreation and/or work) where electric lighting may be required for safety and convenience at night. The vision of human residents and users is adapted to moderate light levels, and they have moderate expectations of electric lighting. Lighting is expected to be non-continuous (e.g., pools of light at crosswalks or intersections, rather than uniform lighting along a path or street). LZ2 typically includes multifamily residential uses; institutional residential uses; schools, churches, hospitals, hotels, and motels; commercial and/or businesses areas with evening activities that are embedded in predominantly residential areas; neighborhoods serving recreational and playing fields; and/or mixed-use development with a predominance of residential uses.
- ▶ **LZ3: Moderately High Ambient Light.** Areas of human activity (i.e., habitation, recreation and/or work) where electric lighting may be continuous and required for safety and convenience at night. The vision of human residents and users is adapted to moderately high light levels, and they have moderate to high expectations of electric lighting. Lighting is expected to be continuous (e.g., lighting delivered fairly evenly along the length of a path or street). Typically includes commercial corridors; high-intensity suburban commercial areas; town centers; mixed-use areas; industrial areas and shipping and rail yards with high nighttime activity; high-use recreational and playing fields; and regional shopping malls, car dealerships, gas stations, and other nighttime-active exterior retail areas.
- ▶ **LZ4: High Ambient Light.** Areas of high levels of human activity at night including significant interaction among pedestrians and/or vehicles. The vision of humans when outside is typically adapted to moderate light levels. Lighting is continuous and is required for safety and convenience. Expectations for man-made lighting are high, both in terms of light levels and uniformity along pathways or streets. May be used for extremely unusual installations, such as high-density entertainment districts, and sometimes for heavy industrial uses.

The California Building Standards Code (California Code of Regulations [CCR] Title 24) began regulating outdoor lighting effective October 1, 2005. Although the Title 24 standards do not apply to sports lighting, they provide guidance relative to an understanding of the existing lighting environment. The lighting zone classifications contained in Title 24 are defined as follows:

- ▶ **LZ0: Very Low Ambient Illumination.** Undeveloped areas of government-designated parks, recreation areas, and wildlife preserves.
- ▶ **LZ1: Low Ambient Illumination.** Rural areas, as defined by the 2010 U.S. Census. These areas include: single or dual family residential areas, parks, and agricultural zone districts, developed portion of government designated parks, recreation areas, and wildlife preserves. Those that are wholly contained within a higher lighting zone may be considered by the local government as part of that lighting zone.

- ▶ **LZ2: Moderate Ambient Illumination.** Urban clusters, as defined by the 2010 U.S. Census. The following development types may occur here: multifamily housing, mixed-use residential neighborhoods, religious facilities, schools, and light commercial business districts or industrial zoning districts.
- ▶ **LZ3: Moderately High Ambient Illumination.** Urban areas, as defined by the 2010 U.S. Census. The following building types may occur here: high intensity commercial corridors, entertainment centers, and heavy industrial or manufacturing zone districts.
- ▶ **LZ4. High Ambient Illumination.** None.

The Electric Power Research Institute (EPRI) commissioned a report entitled Light Trespass Research by Ian Lewin, PhD, which presented the following recommended maximum illuminance levels for the environmental zones described (these are recommendations only, not standards):

- ▶ **Zone E1: Intrinsically Dark.** 1 lux (0.1 footcandle)
- ▶ **Zone E2: Low Ambient Brightness.** 3 lux (0.3 footcandle)
- ▶ **Zone E3: Medium Ambient Brightness.** 8 lux (0.8 footcandle)
- ▶ **Zone E4: High Ambient Brightness.** 15 lux (1.5 footcandles)

Based on the lighting zone classifications contained in CCR Title 24 and the Model Lighting Ordinance developed by IDA and the IES (IDA-IES 2011), under existing conditions, the project site falls within Lighting Zone LZ2 and corresponding EPRI Zone E2. While adjacent residential neighborhoods and roadways exhibit localized brightness consistent with LZ-2 conditions and produce visible skyglow at the Parkway periphery and levee top, those conditions do not extend into the Parkway corridor itself. Within the portion of American River Parkway south of Raider Stadium, ambient nighttime light is low and the corridor functions as natural open space with riparian habitat and recreational trails. Due to existing development adjacent to the American River Parkway, there is existing low-level ambient light. However, fixed lighting within the American River Parkway is sparse and purpose-limited (e.g., security), interior trail segments primarily remain dark beyond access points, and tree canopy and setbacks limit light trespass from nearby development. Based on land use, ecological sensitivity, and existing nighttime brightness, for the purposes of this EIR, the segment of the American River Parkway that is south of and separated by the by levee from the Rio Americano High School campus is considered to be Lighting Zone LZ-0, based on the Joint IDA–IES classifications.

4.1.2 REGULATORY SETTING

FEDERAL AND STATE

Federal and State Wild and Scenic River Systems

The National Wild and Scenic Rivers Act of 1968 (Public Law 90-542; 16 U.S. Code 1271 et seq.) created the National Wild and Scenic Rivers System to preserve certain rivers with outstanding natural, cultural, and recreational values in a free-flowing condition for public enjoyment. The Act safeguards the special character of these rivers, while also recognizing the potential for their appropriate use and development. Designated segments need not include the entire river and may include tributaries.

The California Wild and Scenic Rivers Act of 1972 (Public Resources Code Section 5093.50 et seq.) preserves designated rivers which possess extraordinary scenic, recreational, fishery, or wildlife values in a free-flowing

state, together with their immediate environments, for the benefit and enjoyment of the public. Rivers or segments included with the system are classified as “wild,” “scenic,” or “recreational” based on the level of existing development of adjacent land areas when designated. Designated segments need not include the entire river.

The lower American River from its confluence with the Sacramento River upstream to Nimbus Dam (23 river miles) is classified as a “Recreation” river within both the State and Federal Wild and Scenic River Systems. River segments designated as “recreational” are readily accessible by road or railroad, may have some development along their shorelines, and may have been impounded or diverted in the past (Public Resources Code Section 5093.53).

Model Lighting Ordinance

In 2011, the IDA and the IES developed a Model Lighting Ordinance (MLO) and an accompanying User’s Guide to address the need for regulation of outdoor lighting in North America (IDA-IES 2011). As noted by the IDA (2023), the MLO has not been widely adopted by jurisdictions across the U.S.; however, it does provide a framework that can be used for lighting designs and analyses. The MLO was developed to provide suggested regulations for outdoor lighting to:

1. Permit the use of outdoor lighting that does not exceed the minimum levels specified in IES recommended practices for night-time safety, utility, security, productivity, enjoyment, and commerce.
2. Minimize adverse offsite impacts of lighting such as light trespass, and obtrusive light.
3. Curtail light pollution, reduce skyglow and improve the nighttime environment for astronomy.
4. Help protect the natural environment from the adverse effects of night lighting from gas or electric sources.
5. Conserve energy and resources to the greatest extent possible.

The MLO defines lighting zones and provides methods for calculation of outdoor lighting for residential, non-residential, and outdoor sports field projects. The MLO contains suggested standards for luminaire lumens in each lighting zone based on the proposed land use.^{1,2} The MLO also contains suggested maximum allowable backlight, uplight, and glare (BUG) ratings to be calculated based on the lighting zone and the proposed land use.

LOCAL

Sacramento County General Plan

Although the *Sacramento County General Plan of 2005–2030* (Sacramento County 2022a) does not directly apply to the proposed project, the following policy related to aesthetics is included for context.

1 A luminaire is a complete lighting source: the light unit itself and all the components directly associated with the distribution, positioning, and protection of the light unit.

2 Lumens are a measure of the total quantity of visible light emitted by a light source. For light-emitting diode (LED) lighting, the amount of lumens indicates the “brightness” of a light; more lumens result in a brighter light.

Land Use Element

- **Policy LU-31:** Strive to achieve a natural nighttime environment and an uncompromised public view of the night sky by reducing light pollution.

Arden-Arcade Community Plan

Sacramento County’s Arden-Arcade Community Plan was adopted in 1980, last had text revisions in 2006, and includes policies addressing housing, commercial development, circulation, open space within a 21 square-mile area bounded by Auburn Boulevard and Winding Way on the north, Walnut Avenue on the east, the American River on the south, and the Sacramento city limits on the west. The Rio Americano High School campus has a Community Plan land use designation of Residential 4 (RD-4) with a Public Quasi-Public (PQP) combining designation to denote the use of the property for a school since 1963. The primary issue identified in the Community Plan is the need for better transportation access, but also visual issues such as blight created by commercial signage, the lack of landscaping standards, and development and construction in the Community Plan Area that has created “sterile, cluttered, unsightly commercial areas” (Sacramento County 1980, page 2).

Sacramento County Zoning Code

The proposed project does not require any zoning-related approvals from Sacramento County. However, for context, the project site is zoned Residential 4/Parkway Corridor (RD-4/PC). Public K-12 schools are permitted primary use under the Sacramento County Zoning Code in areas zoned RD-4 (Sacramento County 2024). The Parkway Corridor combining district is “applied to property in areas on which uses may affect the aesthetics of the American River Parkway” and “has been established to limit uses that visually impact the parkway” and address developments that could erode bluff areas along the American River (Sacramento County 2024, page 2-11).

The County’s Zoning Code includes standards and management practices required for different types of land uses, including, for example, minimum levels of security lighting for commercial uses (3.7.8.A.4.a), requirements to design lighting so that no source of light is visible outside of the subject property (Section 3.7.9.C.2.h), and a requirement that lighting fixtures are shielded and directed away from adjacent areas to minimize light pollution caused by glare or spillage into neighboring properties (Tables 5.7.B and 5.8.B). While the County’s lighting standards do not apply to the proposed project, this information has been considered in the analysis presented in this EIR and the design of the proposed lighting.

Sacramento Countywide Design Guidelines

Although the County Design Guidelines and the County’s Design Review Program do not directly apply to the proposed project, the following is provided for context. The *Sacramento Countywide Design Guidelines* (Sacramento County 2022b) were adopted to promote high quality, sustainable, and healthy community design. The objectives of the Guidelines, in conjunction with the County’s Design Review Program, are to: achieve high standards for the quality of the built environment, advance sustainable development, and provide business and user-friendly practices. As noted above, although the County Design Guidelines and the County’s Design Review Program do not directly apply to the proposed project, highlights of design guidance for institutional development are listed below for context.

- ▶ Lighting should enhance the architectural and site design concepts while being energy efficient. Architectural lighting is encouraged.
- ▶ Spillover lighting that is visible from outside the site should be avoided by orienting fixtures downward or shielding light.
- ▶ Energy efficient lighting shall be at levels that provide public safety and meet or exceed Zoning Code standards.
- ▶ Low, pedestrian-scaled fixtures are encouraged to help identify and light pedestrian routes.
- ▶ Lighting in service areas should be the minimum required for operation, and should be designed to minimize the visibility to those areas, while providing for a safe environment. Motion controlled lighting is recommended.
- ▶ Lighting should be LED lights or other acceptable high energy efficiency lights, with automatic controls to dim lights after certain hours or when no one is present. Lighting shall be adequate to provide for a safe environment.
- ▶ Provide energy efficient lighting in all common areas and buildings, including pedestrian and vehicular routes. The emphasis should be on personal safety, with lighting landscape or building surfaces secondary.

American River Parkway Plan

The Parkway is an open space greenbelt that extends approximately 29 miles from Folsom Dam in the northeast to the confluence with the Sacramento River in the southwest. There are several distinct areas of the Parkway, each having individual features which contribute to their separate identities. The American River Parkway Plan (Sacramento County 2008) provides a guide to land use decisions affecting the Parkway; specifically addressing its preservation, use, development, and administration. Sacramento County has the principal responsibility for administration and management of the Parkway as guided by the American River Parkway Plan. The American River Parkway Plan also acts as the management plan for the federal and state Wild and Scenic Rivers Acts.

The proposed light standards at the project site would be installed approximately 175 and 435 feet, respectively, northwest of the American River Parkway, and approximately 230 feet (at the closest point) northwest of the Jedediah Smith Memorial Trail within the Parkway.

Although the policies contained in the American River Parkway Plan do not directly apply to the proposed project, the following policy related to visual impacts from uses and facilities adjacent to the Parkway is included for context.

- ▶ **Policy 7.24.** In order to minimize adverse visual impacts on the aesthetic resources of the Parkway, local jurisdictions shall regulate adjacent development visible from the Parkway. These local regulations shall take into account the extent to which the development is visible from the Parkway. Regulations may include tools to address design, color, texture and scale, such as:
 - Setbacks or buffers between the Parkway and the development.

- Structures to be stepped away from the Parkway or limits on building scale.
- Screening of structures visible from the Parkway with landscaping, preferably native vegetation or other naturally occurring features.
- Use of colors and materials including non-reflective surfaces, amount of glass, and requiring medium to dark earth tone colors that blend with the colors of surrounding vegetation, particularly in sensitive bluff or river's edge locations.
- Guidelines to discourage intrusive lighting and commercial advertising.

4.1.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to aesthetics if it would:

- ▶ have a substantial adverse effect on a scenic vista;
- ▶ substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings, within a state scenic highway;
- ▶ 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 point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; or,
- ▶ create a new source of substantial light or glare that would adversely affect day or nighttime views in the area.

ISSUES NOT DISCUSSED FURTHER

Substantial Adverse Effect on a Scenic Vista—As shown in KOP-7, views of the project site from the Parkway are blocked by the elevated flood control levee on the north side of the American River, along with line of tall trees at the back of the school property boundary; this view is not scenic. The project site itself is a high school campus that has been developed with a school since 1963. Bleacher seating and small upgrades at the stadium were installed in 2006, and the current modernized and improved stadium was completed in 2019. Single-family residences with associated landscaping on flat topography are present to the north, east, and west. The school campus is not part of a scenic vista. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

Substantial Damage to Scenic Resources within a Designated Scenic Highway—There are no State or locally-designated or eligible scenic highways within the project viewshed (Caltrans 2026, Sacramento County 2022a). The nearest State-designated highway is State Route 160 (River Road), approximately 10.5 miles to the southwest. The nearest County-designated scenic highway is Garden Highway, approximately 8.5 miles west of the project site. The project site is not visible from either of these roadways. Therefore, implementation of the proposed project would not affect scenic resources within a State- or County-designated scenic highway. Thus, there would be no impact, and this issue is not evaluated further in this EIR.

METHODOLOGY

This visual impact analysis is based on a review of maps and aerial photographs and a review of proposed project design elements and construction drawings. Analysis of the project's impacts was based on evaluation of the changes to the existing visual resources that would result from project implementation. In making a determination of the extent and implications of the visual changes, consideration was given to:

- ▶ specific changes in the visual composition, character, and valued qualities of the affected environment from public viewpoints;
- ▶ the visual context of the affected environment;
- ▶ the numbers of public viewers, their activities, and the extent to which these activities are related to the aesthetic qualities affected by the project-related changes.

It should be noted that an assessment of visual character is inherently a subjective matter, and reasonable people can disagree as to whether changes in visual character would be adverse or beneficial.

Off-site effects of light pollution for any project may include light trespass, glare, and skyglow. All of these issues are functions of the fixture or luminaire design and installation. This analysis uses the terms light trespass, glare, and skyglow as defined by the MLO (IDA-IES 2011), as listed below:

- ▶ **Light Trespass:** Light that falls beyond the property it is intended to illuminate.
- ▶ **Glare:** Lighting entering the eye directly from luminaires or indirectly from reflective surfaces that causes visual discomfort or reduced visibility.
- ▶ **Skyglow:** The brightening of the nighttime sky that results from scattering and reflection of artificial light by moisture and dust particles in the atmosphere. Skyglow is caused by light directed or reflected upwards or sideways and reduces one's ability to view the night sky.

A Lighting Report was prepared as part of the project's preliminary lighting design and engineering to determine (via computer modeling) the amount of light trespass, glare, and skyglow that could be generated as a result of the proposed project (Appendix B). The analysis of nighttime lighting impacts herein (Impact) relies on the Lighting Report.

IMPACT ANALYSIS

Impact 4.9-1. Substantially Degrade the Existing Visual Character or Quality of the Project Site, or Conflict with Applicable Zoning and Other Regulations Governing Scenic Quality?

Degradation of Visual Character

The project site consists of the outdoor stadium, paved fire access lane, and paved main parking area associated with the Rio Americano High School campus, which was developed as a school in 1963 with the current modernized and improved stadium completed in 2019. The project site is located in the urbanized area of Arden-Arcade (within the County's Arden-Arcade Community Plan Area), adjacent to the urbanized areas of Carmichael (to the east) and Rancho Cordova (to the south). The project site is surrounded by Rio Americano High School

buildings to the west; single-family residences across American River Drive to the north and east; and the American River Parkway to the south.

The only public viewpoints in the project vicinity are from pedestrians, cyclists, and motorists traveling on American River Drive immediately north of the project site between Saverien Drive and Wixford Way, and from pedestrians and bicyclists on the paved crown (maintenance access road) of the north bank American River levee. The project site is not visible from the American River Parkway or the Jedediah Smith Memorial Trail due to the intervening elevated flood control levee.

The existing main parking area for the campus would serve as the proposed construction staging area. Due to the intervening vegetation on the school campus (see KOPs 2 and 3), views of construction equipment in the staging area would be partially blocked for pedestrians, cyclists, and motorists traveling on American River Drive. Motorists at the south end of Saverien Way would have unobstructed short-term views of the construction staging area. The construction staging area is not visible from the American River Parkway due to the elevated levee, and is not visible from the levee crown road due to intervening campus buildings. A crane may be necessary to set the light poles, and the top of the crane at the stadium would be visible for a few days in background views from those traveling on American River Drive and in foreground views from recreationists within the American River Parkway, as well as the top of levee crown road. Due to the limited nature of construction, there would be a small amount of construction equipment, and it would only be present for a period of 2–3 weeks. Thus, the short-term and temporary visual change from construction equipment would not substantially degrade the existing visual character or quality of public views of the site and its surroundings from American River Drive, the south end of Saverien Way, or the American River Parkway, and therefore would result in a **less-than-significant** impact.

American River Drive is oriented east to west approximately 890 feet north of the closest proposed light pole. As shown in KOPs 2 and 3, views of the lower 20 feet of the proposed light poles would be blocked by the intervening fencing at the back side of the campus baseball fields. However, the upper 70–80 feet of the light poles and the luminaires would be visible to motorists looking south from American River Drive and at the south end of Saverien Way. The proposed four new light poles would be installed immediately adjacent to the existing Rio Americano High School track and field, and next to the existing (and proposed new) bleacher seating. The light poles would be visually similar to other existing urban development at the project site, including the power poles, bleachers, scoreboard, concession building, and various equipment storage buildings. Although the poles would be tall, they would be of a small diameter and of a similar color as the existing on-site development. The light silver/grey color of the steel poles and luminaires would tend to blend in with the sky background. The existing public address system speakers that would be upgraded are not visible from any public viewpoints and would not be visible when they are reinstalled. The proposed bleacher seating to accommodate more spectators would be composed of the same materials (steel), would be the same color as the existing bleachers (silver/grey), and would be visually similar to existing conditions (in background views from American River Drive and foreground views from the top of the levee crown). The proposed lighting along the existing fire lane would be visually screened, shielded, of low wattage, and directed downward onto the roadway to provide improved pedestrian safety at night. Therefore, the proposed light poles, improved bleacher seating and public address system upgrades, and pedestrian safety lighting would not substantially degrade the existing visual character or quality of public views of the site and its surroundings from American River Drive or the south end of Saverien Drive, and this impact would be **less than significant**.

As noted previously, the Rio Americano High School campus, including the existing Raider Stadium, is separated from the American River Parkway by the elevated north bank American River levee. Views of the project site from the Parkway, including from the Jedediah Smith Memorial Trail, are blocked by the elevated levee (see KOP-7); however, the project site is visible to pedestrians and bicyclists on the paved levee crown road (which is closed to public vehicles). The proposed light standards would be installed approximately 225–460 feet north of the Jedediah Smith Memorial Trail (at the closest points) within the Parkway. Due to the intervening tall evergreen trees along the back side of the campus property and the small diameter of the light standards, the standards themselves would not be visible from the Parkway. However, the light poles and luminaires would be intermittently visible (through the row of on-campus trees) to recreationists looking upwards and northwards from the Parkway and from the levee crown road. The light silver/grey color of the luminaires, where visible, would tend to blend in with the sky background and would be small in scale compared to the existing viewshed, and would not obstruct northward views from the Parkway or the levee crown road. Therefore, the proposed light poles and luminaires would not substantially degrade the existing visual character or quality of public views of the viewshed from the American River Parkway, and this impact would be **less than significant**.

Conflicts with Regulations Governing Scenic Quality

Because Rio Americano High School is a California public school, it is not subject to County standards that govern scenic quality. Therefore, the discussion below is provided for informational purposes only. The project site and immediately surrounding development are zoned RD-4. Public K-12 schools are a primary allowable use under the Sacramento County Zoning Code in areas zoned RD-4 (Sacramento County 2024, page 3-9, Table 3-1). Rio Americano High School is operated by the San Juan Unified School District as a public school under a conditional use permit from the County.

Outdoor nighttime lighting for evening sporting events (particularly football) is common at other high schools and college campuses throughout the county, including the privately owned and operated Jesuit High School approximately 0.35 mile northeast of the project site. Outdoor lighting at stadiums requires tall poles that serve as light standards. While not applicable to the proposed project, the Sacramento County Zoning Code (Sacramento County 2024) allows outdoor nighttime lighting at schools with a conditional use permit.

Furthermore, given the intervening screening between the American River Parkway and the project site, which consists of the elevated north bank American River levee and a line of tall, evergreen eucalyptus trees along the campus' southern property boundary (see KOP-7), only the tops of the poles and luminaires would be intermittently visible from the Parkway through the trees. The poles would be of a small diameter, and the light silver/grey color of the luminaires would tend to blend in with the sky background. The Rio Americano subarea of the American River Parkway adjacent to the project site is designated by the Parkway Plan as "Limited Recreation" (consisting only of open space and the Jedediah Smith mixed-use trail) and, furthermore, this area of the Parkway is not available for use after sundown (Sacramento County 2008). Therefore, the proposed project would not conflict with the policies of the American River Parkway Plan as related to scenic quality.

Impact 4.1-1. Create a new source of substantial light or glare that would adversely affect day or nighttime views in the area?

As described above under the heading "Methodology," the District retained the services of Musco Lighting (a leading provider of outdoor LED sports lighting systems), to design the proposed stadium lighting system and provide a lighting report. The Lighting Report prepared by Musco Lighting (attached to this draft EIR as

Appendix B), provides the computer modeling results of anticipated lighting levels as well as backlight, uplight, and glare at the adjacent property lines and the American River Parkway resulting from the proposed stadium lighting. The information presented below is derived from the Musco Lighting Report and BUG analysis.

The Musco lighting design for the proposed project identified the calculated brightness of the LED stadium lights measured in lumens and candelas. A visual example of the amount of glare that is generated in relation to candelas is provided in Appendix B to the Lighting Report (Musco 2026).

As described in Section 4.1.1, “Environmental Setting,” the project site and surrounding residential neighborhoods are in Lighting Zone LZ2/E2, with moderate levels of existing ambient illumination, and the American River Parkway, approximately 100 feet south of Rio Americano High School at the nearest point, is considered for the purposes of this evaluation to be Lighting Zone LZ0/E1, as intrinsically dark with no to very low levels of existing ambient illumination, based on CCR Title 24 and Joint IDA–IES classifications. As noted in Section 4.1.1, “Environmental Setting,” the Electric Power Research Institute suggests a recommended maximum illuminance level of 3 lux (0.3 footcandle³) for Lighting Zone E2 and of 1 lux (0.1 footcandle) for Lighting Zone E1. As shown in the Lighting Report, modeling results demonstrate that, at the boundary to the east between the Rio Americano High School property and the backyards of four houses, light levels from the proposed stadium lighting would range from 0.02 to 0.13 horizontal footcandle (Lighting Report page 10) and 0.05 to 0.28 vertical footcandle (Lighting Report page 11) under maximum illumination scenario with all possible fixtures operating (which is not a likely scenario, as the maximum lighting scenario proposed is for football game condition, in which 52 of the total 64 available fixtures on all four light poles would be operating). At the northernmost edge of the Rio Americano Parkway, coinciding with the levee toe and Jedediah Trail, under the maximum illumination scenario of all 64 circuits operating (as noted above, this is not a realistic scenario but used to demonstrate the maximum potential lighting impact), the proposed project would generate 0.00 vertical and horizontal footcandle (Lighting Report page 18). As shown in the footcandle values presented below for comparison, the amount of stadium lighting that would be generated at the back property lines of these three residences would be only slightly more illumination than is generated by moonlight and less than street lighting. The footcandle values from the proposed stadium lighting would be below the 0.3 footcandle standard, as well as typical for the adjacent residences and the 0.1 footcandle standard for the Parkway.

For comparison purposes, typical lighting levels measured horizontally at ground level consist of the following:

- ▶ Clear, sunny daylight: 8,000-10,000 footcandle
- ▶ Cloudy sky: 1,000-1,500 footcandle
- ▶ Street lighting: from 1 to 2 footcandle
- ▶ Moonlight: 0.03 footcandle

As described in Chapter 3, “Project Description,” of this EIR, the use of nighttime lighting during and following athletic practices would generally end by 8:00 P.M. Nearly all athletic games would end by 10:00 P.M., but no later than 11:00 P.M., with lighting potentially remaining on for a short time afterwards to facilitate safe crowd exiting and for clean-up and other similar activities after game completion. The total number of nighttime games during a calendar year, when the lighting system would be used at full illumination is estimated to be five to eight home football games, depending on whether the team has playoff games; reduced illumination for other games is

3 A footcandle is a measurement of light intensity. One footcandle is defined as the amount of light necessary to saturate a 1-foot-square area with one lumen of light.

estimated to be 40 total evening and nighttime events taking place around and after sundown, and could include up to 88 days of practice across the various sports teams that utilize the field, each of which could include some evening use and illumination of the field and a reduced level compared to game events.⁴ It should also be noted that existing use of the track and field for sporting practices and games does include some evening and nighttime use, requiring the use of diesel-powered portable lighting, which is not directional. Representative existing lighting conditions during evening and nighttime use of the field are shown in KOPs 4 through 6, above, demonstrating how existing conditions provide for lighting of the track and field area (shown in KOP 6).

The Lighting Report includes visual simulations of the proposed stadium lighting under evening and nighttime conditions, showing aerial views of the stadium lighting and also the view from multiple locations surrounding the stadium. Simulated views of the proposed stadium lighting from surrounding viewpoints have been excerpted from the Lighting Report and presented below in Visual Simulations 1 through 5.

The primary public viewpoints of the project site are from American River Drive, and from the Jedediah Smith Memorial Trail and the paved access road along the crown of the north bank American River flood protection levee. Visual Simulations 1a (daytime view) and 1b (nighttime view), and 2a (dusk view) and 2b (nighttime view), show expected views from these viewpoints, respectively, with implementation of the proposed project. At the northernmost edge of the American River Parkway, coinciding with the levee toe and Jedediah Trail, under the maximum illumination scenario of all 64 circuits operating (which is not a realistic scenario, but used to demonstrate the maximum potential lighting impact), the proposed project would generate 0.00 vertical and horizontal footcandle (Lighting Report page 18).



Source: Prepared by Musco Lighting 2026

Visual Simulation 1a: View of Proposed Stadium Lighting, looking southeast from American River Drive (day).

⁴ This number is derived by totaling the historical average number of regular season home games and home playoff games shown in Table 3-1: Existing and Future Stadium use in Chapter 3, "Project Description."



Source: Prepared by Musco Lighting 2026

Visual Simulation 1b: View of Proposed Stadium Lighting, looking southeast from American River Drive (night).



Source: Prepared by Musco Lighting 2026

Visual Simulation 2a: View of Proposed Stadium Lighting, looking northwest from Jedediah Smith Trail (dusk).



Source: Prepared by Musco Lighting 2026

Visual Simulation 2b: View of Proposed Stadium Lighting, looking northwest from Jedediah Smith Trail (night).

Under CEQA, an evaluation of a project’s potential visual change as viewed from private property is not required (*Mira Mar Mobile Community v. City of Oceanside*, 119 Cal.App.4th 477 [Cal. Ct. App. 2004]). Nevertheless, for purposes of full disclosure, the District has elected to provide a comparison of nighttime lighting changes from the surrounding private residences. The nearest residences to the proposed stadium lighting backup to the Rio Americano High School property boundary on the east side of the stadium, along Whitehall Way. As described in the Section 4.1.1, “Environmental Setting,” and shown in KOP-1 above, these residences generally have direct views of the existing stadium from their backyards; some residences have large deciduous trees lining their yards and obscuring views of the school property and stadium. Visual Simulations 3a and 3b illustrates a representative daytime and nighttime views, respectively, from the front yard of the private residences at Whitehall Way and Regency Circle looking west towards the stadium, and Visual Simulation 4 illustrates a representative view from the northeastern edge of the project site looking toward Raider Stadium, which could be a representative view of the lighting levels visible from the backyards of adjacent private residences during nighttime event conditions. Nighttime lighting for the residences north of American River Drive, looking south at the stadium would be the same as shown from Visual Simulations 1a and 1b, above.

The Lighting Report shows a grid of projected footcandle ratings generated by computer modeling, which demonstrates that the light level at the property lines of the surrounding residences to the east would range from 0.02 to 0.13 horizontal footcandle (Lighting Report page 10) and 0.05 to 0.28 vertical footcandle (Lighting Report page 11) under maximum illumination scenario with all possible fixtures operating (which is not a likely scenario, as the maximum lighting scenario proposed is for football game condition, in which 52 of the total 64 available fixtures on all four light poles would be operating). Reflective of these modeled light levels, Visual Simulation 5 provides an overhead (downward looking) view with implementation of proposed improvements, showing the

resultant lighting of the existing field and limited to no light trespass outside of the track and field area boundaries.



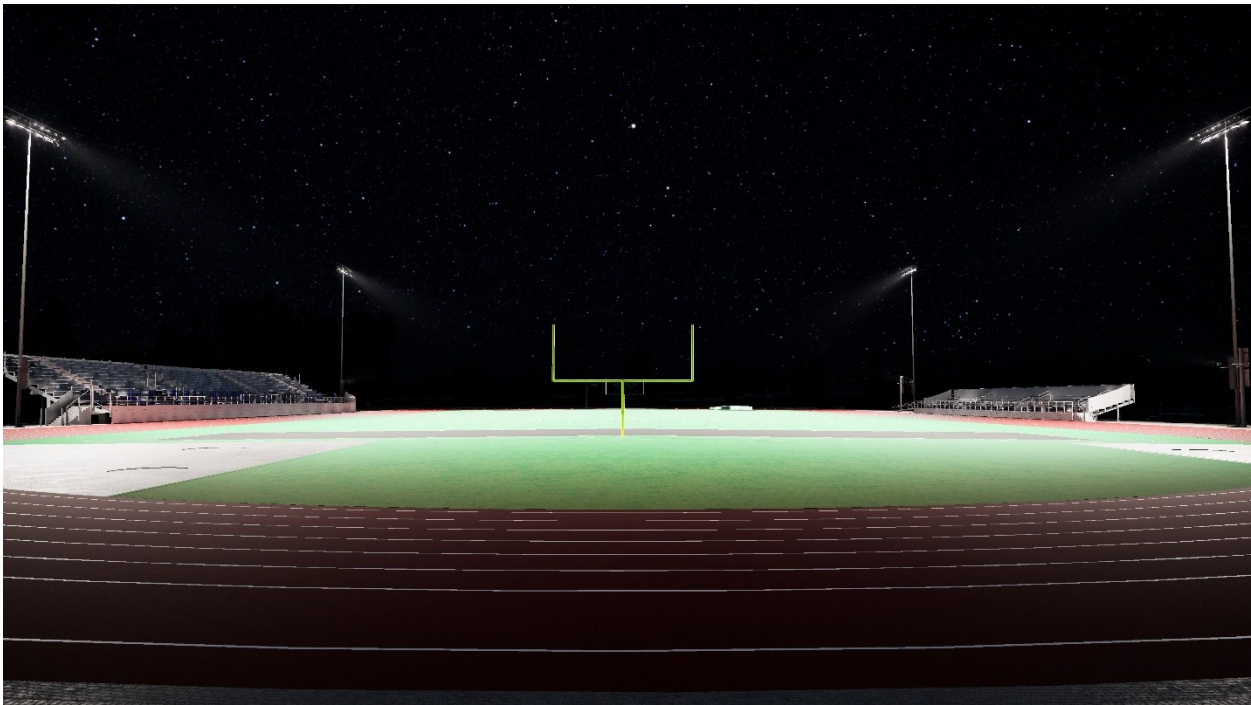
Source: Prepared by Musco Lighting 2026

Visual Simulation 3a: View of Proposed Stadium Improvements, looking westward from the front yard of the private residences at Whitehall Way and Regency Circle (day).



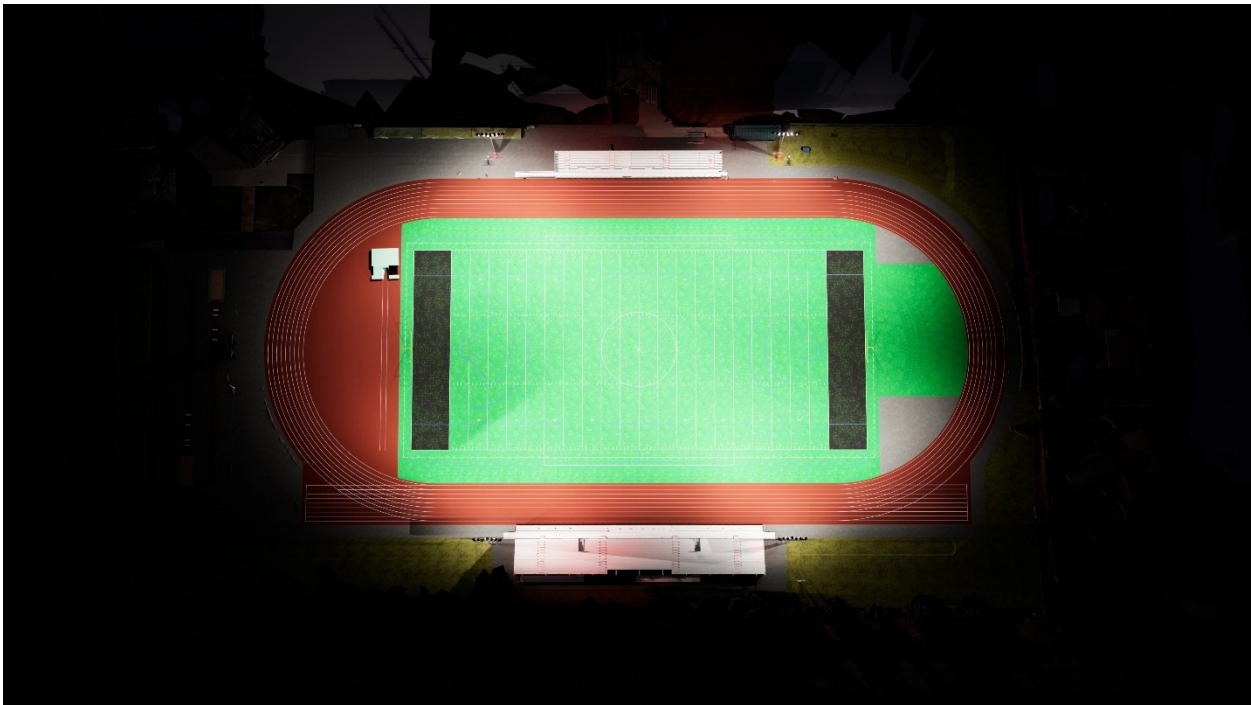
Source: Prepared by Musco Lighting 2026

Visual Simulation 3b: View of Proposed Stadium Improvements, looking westward from the front yard of the private residences at Whitehall Way and Regency Circle (night).



Source: Prepared by Musco Lighting 2026

Visual Simulation 4: View of Proposed Stadium Improvements, looking westward from eastern Rio Americano High School property boundary (night).



Source: Prepared by Musco Lighting 2026

Visual Simulation 5: Overhead View of Proposed Stadium Lighting, looking downward upon Raider Stadium (night).

The lighting design and technology is specifically crafted for uses such as sports fields and to minimize glare, skyglow, and light trespass. Rather than projecting light from an open bulb or diode, the proposed lighting houses

the LEDs deep within the luminaire, bouncing the light off engineered, multi-faceted internal reflective top surfaces. This turns a scattering beam into a highly targeted sheet of light. In addition, the design includes physical visors that act as a strict mechanical block. They catch escaping upward or sideways light and trim the beam edge cleanly. Counter-intuitively, keeping light pollution away from neighbors requires taller poles, not shorter ones. By mounting the fixtures high above the stadium (often 60 to 80+ feet), the light can be aimed downward at a steep angle. A steep downward angle means the light hits the turf directly rather than horizontally out into surrounding areas or upwards in a way that would create skyglow. Finally, the poles will have two ball trackers per pole at 16 feet up on the pole and would be used only for football. A ball tracker is a tiny, highly controlled portion of the system that is optimized to project a low-intensity, glare-free beam specifically upward to illuminate the underside of an aerial ball and only targets the path of the ball. As noted earlier, the guidance contained in the MLO recommends incorporating the BUG rating system for luminaires, which provides more effective control of unwanted light, including light trespass, glare, and skyglow. For similar light standards using the same technology as proposed for this project and to light an existing high school football stadium, a BUG analysis of the proposed lighting system was performed, and the lighting plan reviewed by the IDA for validation that it met the criteria adopted under IDA's Community Friendly Outdoor Sports Lighting program. The IDA assigns either a "pass" or "fail" rating when performing its review. For this similar project, the IDA assigned a "pass" rating to the project's proposed stadium lighting, indicating the backlight, uplight, and glare generated by the proposed stadium lighting would meet the IDA's standards to reduce glare to a level that would not cause annoyance or disruption, and would reduce skyglow to a low level (M. Neils Engineering, Inc. 2023). As described above, the Lighting Report shows a grid of projected footcandle ratings generated by computer modeling, which demonstrates that the light level at the property lines of the surrounding residences to the east would range from 0.02 to 0.13 horizontal footcandle (Lighting Report page 10) and 0.05 to 0.28 vertical footcandle (Lighting Report page 11) under maximum illumination scenario with all possible fixtures operating (which is not a likely scenario, as the maximum lighting scenario proposed is for football game condition, in which 52 of the total 64 available fixtures on all four light poles would be operating). Furthermore, the average brightness of the lights, measured in candelas, is reported as an average of 3,992 under the maximum scenario of all circuits on, and a maximum of 10,016 candela, which is within the 'low' brightness range. As the same technology and similar design as evaluated under the similar project and that was assigned a "pass" rating by the IDA for the BUG analysis would be implemented under the proposed project, and based on the very low footcandle ratings and low candela ratings, it is reasonable to assume that the proposed project would similarly achieve a "pass" rating by IDA, demonstrating that the proposed project lighting system would meet the goals established by the IDA for the control of glare.

In conclusion, expert modeling demonstrates that the proposed stadium lighting would result in zero light trespass off-site at public (American River Drive, Regency Circle, and the American River Parkway) and private (neighboring residences) viewpoints. Modeling also demonstrates that glare and skyglow would be reduced to levels that meet IDA standards. Therefore, the proposed stadium lighting would be consistent with the Electric Power Research Institute recommended maximum illuminance levels for the applicable Lighting Zones, as described above. Furthermore, existing conditions include use of diesel-powered portable lights to accommodate some evening and nighttime events. Representative views and related lighting during such events are shown in KOPs 4 through 6. Current lighting of the track and field area is not directional and does result in some light spillage outside of the Rio Americano High School boundary, such as at the adjacent levee (shown in KOP 6). Nonetheless, without the Dark Sky Association "pass" rating, it is conservatively considered that the project could result in uplighting and glare. Therefore, this impact is considered **potentially significant**.

Mitigation Measure 4.1-2: Obtain a “pass” Rating for Project Lighting Design from the International Dark Sky Association Backlight, Uplight, and Glare

Prior to the start of construction, the District shall submit the proposed lighting design to the International Dark Sky Association for a Design Analysis and request a determination as to whether the design meets the program guidelines. Should the design not meet the program guidelines, the District will refine and resubmit until the design receives a “pass” rating. The approved designs would be validated through receipt of an International Dark-Sky Association approval letter. Construction shall not commence until the design receives the “pass” rating and approval letter.

Significance after Mitigation

Implementation of Mitigation Measure 4.1-1 would demonstrate that the proposed project lighting aligns with the standards of the International Dark-Sky Association and minimizes backlight, uplight, and glare. As described by the Dark-Sky Program, participating in the DarkSky Approved outdoor sports lighting program supports the following:

1. Minimizes neighborhood lighting nuisances by greatly reducing the allowable spill and glare disruption. Quantitative pass/fail thresholds are established.
2. Manages high-angle glare, thus, off-site light trespass and sky glow effects due to direct and reflected light are dramatically lower.
3. Mandates curfew requirements, thus mitigating neighborhood nuisance factors and sky glow effects which benefit flora/fauna and night sky enthusiasts’ and astronomers’ views of the night skies during peak viewing periods.
4. Limits the class of play to recreational levels, thus discouraging over-lighting practices.
5. Promotes “Best Lighting” practices that minimize lumen densities, which reduces energy consumption, benefiting the environment at large.

As a result, with implementation of Mitigation Measure 4.1-2 and receipt of a DarkSky “pass” rating, this impact is considered **less than significant with mitigation**.

4.2 BIOLOGICAL RESOURCES

This section addresses biological resources that could be affected by implementation of the proposed project. Information presented below is based on review of literature, databases, existing documentation, and the results of daytime bat roost habitat assessment and emergence surveys performed by AECOM biologists in July and August 2025.

4.2.1 ENVIRONMENTAL SETTING

The proposed project would be implemented on the grounds of the existing Rio Americano High School campus, at Raider Stadium and adjacent areas within the campus. The site was originally developed as a school in 1963. Bleacher seating and small upgrades at the stadium were installed in 2006, and the current modernized and improved stadium was completed in 2019. The project site is currently developed with no natural habitats or sensitive biological resources present on the site. The bleachers and adjacent athletic fields at Rio Americano High School are surrounded on the southern, eastern, and northern sides by a 3-foot-high chain link fence. Campus buildings, parking, and paved access pathways are west of the bleachers and fields.

The project site is surrounded to the east, west, and north by residential development. To the south, the project site is separated from the American River Parkway (Parkway) by the American River levee. The Parkway is an open space and natural preserve area that provides recreational opportunities among the natural, aesthetic, and historical resources found along both sides of the American River. Recreational activities along the Parkway consist of hiking, jogging, bicycling, bird watching, dog walking, and recreational boating. The multi-use trail atop the levee is accessible via the southeast side of Rio Americano High School and this levee trail provides connection to the Jedediah Smith Memorial Trail, which is located within the Parkway. There is no vehicular access to the portion of the Parkway near the Rio Americano High School campus; access is limited to pedestrian and bicycles only from the crown of the adjacent north bank American River levee. Although the levee crown is not part of the Parkway, it is paved (for access by levee maintenance equipment) and is available for use by pedestrians and bicyclists.

Please reference Exhibit 3-2 in Chapter 3, “Project Description” for a depiction of the location of the Parkway in relation to the project site.

Though there are no natural habitats present on the project site, there are numerous mature deciduous and evergreen trees and shrubs surrounding the property boundaries, particularly along the southern boundary adjacent to the levee that separates the campus from the Parkway.

Vegetation and Wildlife

The project site is completely developed, and most of the campus area is developed with buildings and paved surfaces. Vegetation on the site consists primarily of turf grass, landscape plantings, and ornamental trees. Few wildlife species have potential to use the project site because of the absence of native plant communities. However, some common wildlife species adapted to urban environments are expected to use landscaped areas for resting and/or foraging. These species include Canada goose (*Branta canadensis*), California scrub jay (*Aphelocoma californica*), mourning dove (*Zenaidura macroura*), European starling (*Sturnus vulgaris*), and house sparrow (*Passer domesticus*).

The project site is bordered on three sides by residential neighborhoods with similar vegetation characteristics (landscaped plantings and ornamental trees). A row of trees, including valley oak (*Quercus lobata*) and eucalyptus (*Eucalyptus* sp.), borders the football field along the southeast side of the project site.

The adjacent Parkway supports important biological resources, including several native vegetation communities and numerous wildlife species. Grassland habitat with a sparse distribution of oaks, small shrubs, and riparian species, such as willow (*Salix* spp.), is present south of the levee that separates the Parkway from the project site. Beyond the grassland/woodland interface, the vegetation transitions to a riparian zone. The riparian zone consists of mixed riparian forest, which contains cottonwood (*Populus fremontii*), willow, white alder (*Alnus rhombifolia*), Oregon ash (*Fraxinus latifolia*), valley oak, and box elder (*Acer negundo*), and is bisected by the aquatic riverine habitat of the American River. This riparian area provides important habitat for a large assemblage of native and nonnative wildlife species including:

- ▶ Foraging, nesting, and roosting habitat for resident and migratory bird species;
- ▶ Foraging, refugia, and breeding habitat for mammal species;
- ▶ Foraging, refugia, and breeding habitat for reptile species; and
- ▶ Seasonal refugia, spawning, and nursery habitat for native fish species, including Chinook salmon (*Oncorhynchus tshawytscha*) and steelhead (*Oncorhynchus mykiss*).

SENSITIVE BIOLOGICAL RESOURCES

Sensitive biological resources evaluated as part of this analysis include special-status and other protected species, and protected trees. AECOM biologists reviewed the following documents and databases to collect information on existing biological resources on the project site and vicinity:

- ▶ Aerial imagery of the project site,
- ▶ The California Natural Diversity Database (CNDDDB) (CDFW 2025),
- ▶ California Native Plant Society's (CNPS's) Rare Plant Inventory (CNPS 2025),
- ▶ U.S. Fish and Wildlife Service's (USFWS) Information for Planning and Consultation (IPaC) (USFWS 2025a),
- ▶ *American River Parkway Plan* (Sacramento County 2008),
- ▶ *Sacramento County General Plan* (Sacramento County 2017),
- ▶ California Department of Fish and Wildlife (CDFW) Special Animals List (CDFW 2026a), and
- ▶ CDFW Special Plant List (CDFW 2026b).

Special-Status Species

Special-status species considered in this EIR include plants and wildlife categorized as follows:

- ▶ species officially listed, candidates for listing, or proposed for listing under the federal Endangered Species Act (ESA), or the California Endangered Species Act (CESA) as endangered, threatened, or rare;
- ▶ species identified as Species of Special Concern or Fully Protected under the California Fish and Game Code (CFGF);
- ▶ taxa (i.e., taxonomic categories or groups) 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 that meet the criteria for listing, even if not currently included on any list, as described in Section 15380 of the CEQA Guidelines.

Sensitive Habitats

Sensitive habitats for the purposes of this analysis include those that are of special concern to resource agencies or that are afforded specific consideration through CEQA or other regulatory requirements (e.g., Section 404 of the federal Clean Water Act). Sensitive habitats (e.g., open water, mixed riparian, oak woodlands) are present along the Parkway; however, no sensitive habitats are located on or within approximately 100 feet of the project site. Therefore, these habitats are not discussed further in this EIR.

SPECIES WITH POTENTIAL TO OCCUR

A list of special-status species that could potentially occur in or near the project site was developed through queries of CDFW's CNDDDB for a 5-mile radius of the project site (CDFW 2025), 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 the USFWS's Information for Planning and Consultation for the project site (USFWS 2025a) (Table 4.2-1).

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 (Table 4.2-1, Exhibit 4.2-1). 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).

Table 4.2-1. Special-Status Species with Potential to Occur within or near the Project Site.

Common Name	Scientific Name	Status ¹	Habitat and Seasonal Distribution in California	Potential to Occur within the Project Site or Be Impacted by Project Implementation
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. The project site and surrounding residential neighborhoods and Parkway do 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. The project site and surrounding residential neighborhoods and Parkway do 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. The project site and surrounding residential neighborhoods and Parkway do not contain suitable habitat.
Slender Orcutt grass	<i>Orcuttia tenuis</i>	FT, SE, 1B.1	Vernal pools. 115–5,775 feet amsl	No potential. The project site and surrounding residential neighborhoods and Parkway do not contain suitable habitat.
Sacramento Orcutt grass	<i>Orcuttia viscida</i>	FE, SE, 1B.1	Vernal pools. 100–330 feet amsl	No potential. The project site and surrounding residential neighborhoods and Parkway do 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. The project site and surrounding residential neighborhoods and Parkway do not contain suitable habitat.
Crustaceans				
Conservancy fairy shrimp	<i>Branchinecta conservation</i>	FE	Large, deep vernal pools in annual grasslands.	No potential. The project site and surrounding residential neighborhoods and Parkway do not contain suitable vernal pool 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. The project site and surrounding residential neighborhoods and Parkway do not contain suitable vernal pool habitat.
Vernal pool tadpole shrimp	<i>Lepidurus packardii</i>	FE	Vernal pools and swales in the Sacramento Valley.	No potential. The project site and surrounding residential neighborhoods and Parkway do not contain suitable vernal pool 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. Blue elderberry, the species' host plant, is present along the southern edge of the project site and potentially in riparian habitat that is located at least 100 feet away from the project site in the Parkway.

Common Name	Scientific Name	Status ¹	Habitat and Seasonal Distribution in California	Potential to Occur within the Project Site or Be Impacted by Project Implementation
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. The project site is outside the species' winter range, and regular mowing of grass and vegetation maintenance within the project site and on the levee slopes adjacent to the project site likely precludes milkweed presence and monarch occupation for breeding.
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. Regular mowing of the grass and vegetation maintenance within the project site and on the levee slopes within 100 feet 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. The project site does not contain suitable aquatic habitat. Project implementation would 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. 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. Requires basking sites for thermoregulation, such as logs, rock, and other protrusions in slow-moving water or upland habitat adjacent to aquatic habitat. Suitable upland habitat for egg laying is typically within 0.3 mile of water. Nesting sites are located in open, dry upland habitat with well-drained soil, sparse vegetation, and good solar exposure.	Potential. The project site is within 0.3 mile of suitable aquatic habitat in the American River and riparian habitat in the Parkway. Vegetation management of the project site and the levee slopes within 100 feet of the project site boundary likely preclude nesting, but the species may bask on the levee slopes or disperse through the Parkway. The 3-foot-high chain link fence around the school campus limits access to the project site.

Common Name	Scientific Name	Status ¹	Habitat and Seasonal Distribution in California	Potential to Occur within the Project Site or Be Impacted by Project Implementation
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. Nonbreeding transient individuals 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.
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. Suitable riparian nesting habitat is present at least 100 feet away from the project site in the Parkway.
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. Suitable riparian nesting habitat is present at least 100 feet away from the project site in the Parkway.
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. The project site is well outside the species' current breeding range. Individuals may use riparian habitat within the 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. 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. Riparian habitat suitable for foraging is present along the Parkway, but the only known breeding in the Sacramento region occurs in weep holes in bridges 4 miles or greater west of the project site.

Common Name	Scientific Name	Status ¹	Habitat and Seasonal Distribution in California	Potential to Occur within the Project Site or Be Impacted by Project Implementation
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. Suitable vertical banks for nesting are not present in or adjacent to the project site
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. Suitable riparian nesting habitat is present at least 100 feet away from the project site boundary in the Parkway.
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. 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. 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

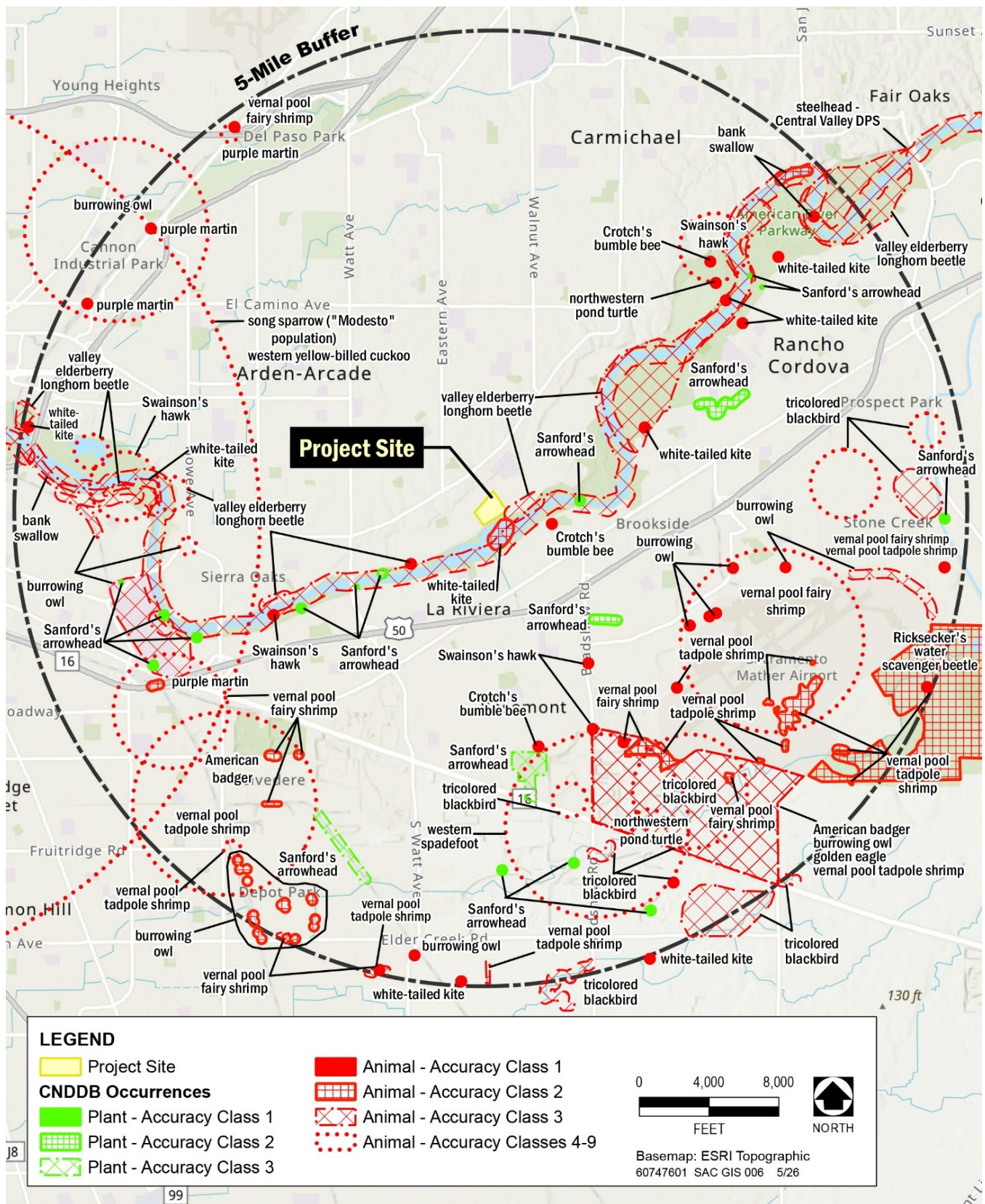
California Rare Plant Ranks (CRPR)

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)



Source: AECOM 2026

Exhibit 4.2-1 CNDDDB Records of Special-Status Species Within 5-miles of the Project Site

Valley Elderberry Longhorn Beetle

Valley elderberry longhorn beetle larvae live within the stems of elderberry shrubs (*Sambucus* spp.) for one to two years, making elderberry shrubs essential for survival. The proposed project does not include removal or trimming of any blue elderberry shrubs that may be hosting valley elderberry longhorn beetle. However, a mature blue elderberry shrub suitable for valley elderberry longhorn beetle occurs in the row of trees along the southern boundary of the project site, and additional blue elderberry shrubs may be present in riparian habitat in the Parkway.

Northwestern Pond Turtle

The project site is located within approximately 350 feet of suitable aquatic habitat for northwestern pond turtle in the American River, and suitable upland riparian habitat is present in the Parkway adjacent to the river, which may be used for basking, nesting, overwintering, cover, and dispersal. However, these areas are separated from the project site by the elevated flood protection levee along the north bank of the American River and 3-foot-high chain link fencing along the boundary of the project site facing the Parkway. Undeveloped areas on the project site and flood protection levee are densely vegetated with grasses and non-native annual forbs and do not provide suitable habitat for sensitive, non-mobile life stages of northwestern pond turtles (i.e., overwintering or nesting individuals). Furthermore, fencing around the campus boundary and vegetation management on the school campus and the levee slopes within 100 feet of the project site likely preclude nesting and overwintering. Therefore, sensitive life stages of northwestern pond turtles are unlikely to be present within 100 feet of the school campus due to lack of suitable habitat, but the species may bask on the levee slopes or disperse along them between more suitable habitats in the Parkway.

Special-Status and Nesting Birds

Suitable foraging and nesting habitat for raptor and non-raptor bird species is present along the Parkway. Large trees within the riparian habitat located along the American River's banks, approximately 100 feet or more from the campus boundary, could provide nesting habitat for special-status raptors, including white-tailed kite and Swainson's hawk, and common raptor species. In addition, tree, shrub, marsh, riparian, and grass vegetation present in the Parkway may be used for nesting or foraging by non-raptor species, including the Modesto song sparrow.

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 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 Parkway south of the project site.

Roosting Bats

Three state-designated Species of Special Concern have 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.

An 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 (i.e., the survey boundaries were not rigidly predetermined but were instead adapted during the fieldwork to better align with the actual environmental conditions and characteristics observed on-site) 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 (primarily eucalyptus and oak located along the southern fenceline between Raider Stadium and the 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, but bats were detected foraging along the side of the playing field. Therefore, no roosting bats are expected within areas that would be disturbed by proposed project improvements or adjacent trees, and the playing field and surrounding vegetated areas provide confirmed foraging habitat. See Appendix C to this EIR for more information regarding the bat roost habitat assessment.

4.2.2 REGULATORY SETTING

The relevant federal, state, and local statutes and regulations that protect biological resources are described in more detail below. Because the project site is located on land that has already been developed for the existing Rio Americano High School, some regulations that protect biological resources are not relevant to the proposed project. The Clean Water Act Sections 404 and 401, as well as the Porter-Cologne Water Quality Control Act, are not applicable to the proposed project, as there are no wetlands or other jurisdictional waters present on-site. Applicable regulations for the proposed project are discussed below.

FEDERAL PLANS, POLICIES, REGULATIONS, AND LAWS

Endangered Species Act

Under the federal ESA, the USFWS has regulatory authority to protect federally listed fish and wildlife species and their habitats. Under the ESA, a permit is required for federal action that may result in “take” of a federally listed species. Take is defined under ESA Section 3 as “to harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, or collect, or to attempt to engage in any such conduct.”

Migratory Bird Treaty Act

The Migratory Bird Treaty Act protects migratory birds, their nests, and eggs from unauthorized take or disturbance. The current list of species protected by the Migratory Bird Treaty Act can be found in Title 50 of the CFR, Section 10.13 (50 CFR 10.13). The list includes nearly all birds native to the United States.

STATE OF CALIFORNIA PLANS, POLICIES, REGULATIONS, AND LAWS

California Endangered Species Act

Under CESA, CDFW has regulatory authority to protect plant and wildlife species that are state listed or proposed for candidacy as threatened or endangered. CESA states that reasonable and prudent alternatives shall be developed by CDFW, together with the project proponent and any state lead agency, consistent with conserving the species, while at the same time maintaining the project purpose to the greatest extent possible. Under CESA, a permit is required for action that may result in “take” of a state listed species, and project-related impacts of

authorized take must be minimized and fully mitigated. Take is defined under CFGC 86 as hunting, pursuing, catching, capturing, or killing a protected species, or attempting any of these actions. Notably, the CESA definition of take differs from the ESA definition of take, as it does not include harm or harassment. As a result, the threshold for take is higher under CESA than under ESA. Authorization for take of state-listed species is obtained through issuance of CFGC Section 2081 Incidental Take Permit or a CFGC Section 2080.1 Consistency Determination.

California Fish and Game Code Sections 3503 and 3503.5 – Protection of Nesting Birds and Raptors

CFGC Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any birds, except as authorized by the CDFW. CFGC Section 3503.5 states that it is unlawful to take, possess, or destroy any raptors (e.g., hawks, owls, eagles, and falcons), including their nests or eggs. Violations of this may include destruction of an active nest as a result of tree removal or actions causing failure of nesting attempts, resulting in loss of eggs or young, that is attributable to disturbance of nesting birds by nearby human activity.

California Fish and Game Code Section 3511 – Protection of Fully Protected Bird Species

CFGC Section 3511 fully protects certain bird species, such as white-tailed kite and golden eagle. A fully protected species may not be taken or possessed at any time, with limited exceptions for scientific research or livestock protection. As of the passage of Senate Bill 147 in 2023, CDFW may authorize take of fully protected species for a subset of project types (e.g., water infrastructure, renewable energy) through issuance of Incidental Take Permits.

California Fish and Game Code Section 4150 – Protection of Nongame Mammals

CFGC Section 4150 protects mammals, including bats, from unauthorized take. This regulation states that a nongame mammal is any mammal that occurs naturally in California and is not classified as a game mammal, exotic game mammal, fully protected mammal, or fur-bearing mammal. Nongame mammals may not be hunted, taken, possessed, or trapped, except as allowed by CFGC.

California Code of Regulations Title 14 Section 251.1

Except as otherwise authorized in the California Code of Regulations or in the CFGC, the California Code of Regulations Title 14 Section 251.1 makes it illegal for any person to harass, herd, or drive any game or nongame bird or mammal or furbearing mammal. For the purposes of this regulation, harass is defined as an intentional act which disrupts an animal's normal behavior patterns, which includes, but is not limited to, breeding, feeding or sheltering. This does not apply to a landowner or tenant who drives or herds birds or mammals for the purpose of preventing damage to private or public property, including aquaculture and agriculture crops.

California Penal Code Section 597

California Penal Code Section 597 makes it a crime to maliciously and intentionally maim, mutilate, torture, wound, or kill a living animal. The law applies to all animals, including pets, farm animals, wild animals, and protected species such as endangered mammals, birds, reptiles, amphibians, and fish (as defined in the CFGC).

California Native Plant Protection Act

The California Native Plant Protection Act (NPPA) allows the California Fish and Game Commission to designate plants as rare or endangered. The NPPA prohibits take of endangered or rare native plants but includes some exceptions for agricultural and nursery operations; emergencies; and after properly notifying CDFW for vegetation removal from canals, roads, and other sites, changes in land use, and in certain other situations. There are 64 species, subspecies, and varieties of plants that are protected as rare under the NPPA.

REGIONAL AND LOCAL PLANS, POLICIES, REGULATIONS, AND LAWS

County

Under California Government Code Sections 53090 and 53091, public school districts are considered political subdivisions of the State of California. As a result, they are not subject to local municipal regulations and ordinances. Nonetheless, for context, County plans, policies, and ordinances related to biological resources are discussed here.

Sacramento County General Plan

The *Sacramento County General Plan* Conservation Element (Sacramento County 2017) provides the goals, objectives, policies, and implementation measures for the preservation and management of biological resources within Sacramento County. Biological resources include special-status species, creeks, streams, rivers, riparian habitat, vernal pools, wetlands, urban streams, native tree habitats (oak woodlands, oak savannah, and mixed riparian woodlands), and fisheries and their macroinvertebrate food sources. The project site is already developed with existing athletic facilities associated with Rio Americano High School with no expansion into biologically sensitive habitats. The Conservation Element also addresses preservation of native tree resources, including landmark and heritage trees.

Sacramento County Tree Preservation Ordinance

The *Sacramento County Tree Preservation Ordinance* (Sacramento County Code, Title 19) sets forth standards for preservation of native oak trees within Sacramento County. The project site is already developed with existing athletic facilities and improvements would be constructed on land that has already been developed for athletic facilities and would not result in the removal of trees.

Sacramento County Swainson's Hawk Ordinance

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.

American River Parkway Plan

The policies contained in the *American River Parkway Plan* (Parkway Plan) do not directly apply to the proposed project site. Nonetheless, due to the project site's proximity to the Parkway, the following goals and policies related to biological resource protection are summarized here for context.

The Parkway Plan (Sacramento County 2008) provides management guidance for land use decisions affecting the Parkway. The Parkway Plan addressed resource preservation, use, and development of the Parkway, including protection of riparian habitats, wildlife corridors, and recreational resources, and establishment of setbacks and restrictions for projects near the Parkway. It was adopted to ensure preservation of natural resources while providing limited development opportunity to facilitate human enjoyment of the Parkway. The primary goal of the Parkway Plan related to biological resources is to preserve, protect, and improve the natural resources of the Parkway, including adequate flow of high-quality water, anadromous and resident fishes, migratory and resident wildlife, and diverse natural vegetation.

The Parkway Plan divides the Parkway into 19 areas, and further divides some areas into subareas, which have area-specific policies regarding authorized use and management of the Parkway's resources. The Rio Americano High School campus is adjacent to the Rio Americano Subarea of what is identified in the Parkway Plan as the Save the American River Association (SARA) Park Area. The Rio Americano Subarea is located north of the American River and includes grassland habitat and a bicycle trail. A string of islands marks historical channels of the river, which create a habitat for many land animals, as well as protected lagoon and wetland areas for waterfowl. Rio Americano High School campus is separated from this subarea by the elevated flood protection levee and fencing along the boundary of the project site.

Recreation and anadromous fishery were identified as outstandingly remarkable values of the lower American River by Federal wild and scenic river managers in 1980, serving as the basis for the acceptance of the lower American River by the Secretary of the Interior. The American River Parkway plan establishes boundaries for the Parkway. As noted in the Wild and Scenic Rivers Reference Guide developed by the Interagency Wild and Scenic River Coordinating Council, "establishing a boundary for a wild and scenic river is an important step in delineating the area which will receive the greatest effort in resource protection." Consistent with that general principle, the principal focus of wild and scenic river management plans is on the management of lands and waters within the boundaries of a wild and scenic river. The Parkway Plan includes the following policies related to biological resources:

- ▶ Policy 3.3: The parkway shall be managed to create habitat connectivity and wildlife travel corridors that provide for the habitat needs of the endangered valley elderberry longhorn beetle and other important native wildlife species, without compromising the integrity of flood control facilities, the flood conveyance capacity of the parkway, or other parkway management goals.
- ▶ Policy 7.5: Privately owned parcels may be developed consistent with local zoning. Parcels should not be rezoned to encourage further development.
- ▶ 7.19: Jurisdictions shall use their authority to reduce, eliminate, and/or mitigate potential adverse impacts upon the Parkway caused by adjacent land uses and activities.
 - 7.19.1: Structures shall be located so that neither they, nor activities associated with them, cause damage to Parkway plants or wildlife.
 - 7.19.2: Structures shall be located so that neither they, nor activities associated with them, impede the recreational use of the Parkway and such structures shall be consistent with the goals and policies of this Plan.

- ▶ Policy 7.22.1: Structures shall be located so that neither they, nor activities associated with them, cause damage to native plants or wildlife, without appropriate mitigation
- ▶ Policy 7.23: Levees, landscaping, or other man-made or natural buffers should be used to separate, buffer or screen the Parkway visually from adjoining land uses, unless the adjacent land uses are indistinguishable from the Parkway.
- ▶ Policy 10.27: The SARA Park site shall not be further developed.
- ▶ Policy 10.28: The Rio Americano wetland/lagoon area should remain undeveloped and protected.

In addition, with regard to lighting, the Parkway Plan also notes, that, “when outdoor lighting in the Parkway is necessary (e.g., at access points and parking lots which are accessible to vehicles after dusk, and in association with meetings and events) it shall be carefully planned to provide essential human safety and security while minimizing impacts to wildlife and night sky aesthetics through the use of techniques such as optimizing foot candle ratios, shielding, re-aiming, non-glare lighting, full cut off optics, short heights, timers, motion sensors, and adjacent native tree and shrubbery plantings.” While this policy language applies to lighting and structures within the Parkway, a similar approach can be considered for adjacent lighting.

4.2.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on biological resources if it would:

- ▶ 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 Wildlife or U.S. Fish and Wildlife Service;
- ▶ 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 Wildlife or US Fish and Wildlife Service;
- ▶ 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;
- ▶ 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;
- ▶ conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance; or
- ▶ conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

IMPACT ANALYSIS

Impact 4.2-1: 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 Wildlife or U.S. Fish and Wildlife Service?

All proposed project improvements would be entirely confined to the project site, which is already landscaped or otherwise developed. Though no sensitive biological resources or special-status species have been identified on the project site, trees and shrubs along the southern border of the project site may provide suitable habitat for valley elderberry longhorn beetle and nesting special-status birds.

In addition, the riparian habitat of the Parkway, which begins approximately 100 feet from the southernmost boundary of Rio American High School and is separated from the project site by the elevated flood protection levee, provides suitable foraging, nesting, roosting, refugia, and hibernation habitat for special-status or otherwise protected species, including valley elderberry longhorn beetle, northwestern pond turtle, special-status and migratory birds, and bats (see Table 4.2-1).

Construction-Related Impacts

Construction of the proposed stadium improvements would include localized excavation and foundation work; augering of footing holes; trenching and backfilling of trench areas; vehicle traffic to deliver materials; and limited paving, patching, or landscaping restoration where disturbed areas are not restored with landscaping. However, these activities would be constrained to the project site and would not encroach on sensitive habitats outside this area.

Though the project site contains grassland and shrub habitat that could be used for nesting, roosting, or foraging by birds or bats, the proposed project does not include any tree removal or removal of any habitat that could be used for these purposes. Therefore, the proposed project would not have any direct impacts on nesting birds, roosting bats, or other special-status wildlife species through habitat removal.

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, so project construction would not impact suitable habitat for special-status species in the Parkway through unintentional release of hazardous materials, such as fuel.

Increased disturbance (e.g., noise, vibration) could result from project construction activities. Potential noise associated with project construction is described in detail in Section 4.3, “Noise and Vibration.” As described therein, measured ambient noise levels south of the project site (ST-03), near the existing levee, were 55 a-weighted decibels (dBA) daytime average ambient noise level (L_{eq}) during daytime hours, with corresponding maximum noise level of 84 dBA maximum level of noise (L_{max}). For conservative analysis, simultaneous operation of the loudest anticipated equipment could result in combined noise levels of up to approximately 86 dBA L_{max} at 50 feet from active construction areas and 80 dBA L_{max} at 100 feet (i.e., the nearest suitable riparian habitat in the Parkway). However, the highest construction noise levels would be temporary and infrequent. Similarly, and as detailed in Section 4.3, “Noise and Vibration,” vibration levels from the equipment with the highest potential vibration level (a dozer, which is only proposed to be used intermittently for two weeks of construction) would result in vibration levels of 0.011 peak particle velocity (69 vibration decibels) at 100 feet

from equipment use, which are unlikely to affect special-status species in the vicinity. For context, PPV of 0.035 is considered “barely perceptible” (Caltrans 2020).

If any valley elderberry longhorn beetles are occupying blue elderberry shrub located within the southern row of trees adjacent to project construction areas, the proposed project could impact this species. Operation of heavy equipment adjacent to the elderberry shrub could result in unintentional damage or removal (e.g., trimming) of this habitat, or degradation in habitat quality (e.g., from accidental equipment leaks, erosion, or compaction of surface soil). Impacts to blue elderberry shrub habitat would result in a **potentially significant** impact to valley elderberry longhorn beetle adults or larvae, depending on the time of year, since this species is highly reliant on this specific vegetation to support their life cycle.

Northwestern pond turtles are not expected to be present on the project site due to the existing 3-foot-high chain link fencing surrounds around the project site, but may be present in the aquatic habitat of the American River located approximately 350 feet from the project site, or the upland habitat of the Parkway, located approximately 100 feet from the project site. Sensitive, nonmobile life stages of northwestern pond turtle are unlikely to be present within 100 feet of project construction activities, but mobile individuals may be present along the levee slopes when basking or dispersing. In the unlikely case that any turtles were able to enter the project site during construction, they may be crushed or injured by equipment. If this were to occur, this would be considered **potentially significant** impact to northwestern pond turtles.

Construction-related noise has the potential to impact northwestern pond turtles in the vicinity of the project site. However, the project site and adjacent Parkway are already subject to ambient background noise levels from surrounding human recreational and urban uses. Simultaneous operation of the loudest anticipated construction equipment would be temporary and infrequent, and predicted maximum noise levels during construction would be 80 dBA at the nearest suitable habitat 100 feet from the work area, which is slightly less than the measured maximum noise level of 84 dBA near the levee under typical conditions. Furthermore, construction activities would be limited to brief periods, including approximately one week for stadium light pole installation and up to 12 weeks for installation of additional bleachers; other construction further from the Parkway would include approximately two weeks for egress pathway lighting installation. Sensitive, nonmobile life stages of northwestern pond turtles (i.e., nesting or aestivating) are unlikely to be present within 100 feet of the project site due to the lack of suitable habitat, so would not be exposed to increases in maximum noise levels from project construction activities. Although unlikely to be present in the marginal habitat along the levee slopes, any turtles within 100 feet of the project site would be mobile and able to disperse away from construction-related noise toward more suitable habitat along the American River to avoid temporary increases in noise levels during construction, which would be similar to maximum measured noise levels along the levee under existing conditions. Therefore, potential impacts to northwestern pond turtles from construction-related noise would be **less than significant**.

In addition, it should be noted that Mitigation Measure 4.3-1a, as identified in Chapter 4.3, “Noise and Vibration,” to reduce potential noise-related impacts on adjacent residents would also further reduce potential construction-related noise levels at surrounding habitat by restricting hours of noise generating activity to daytime hours and equipping all construction equipment with noise-reduction devices.

Project construction would occur in the vicinity of suitable nesting habitat for Swainson’s hawk, white-tailed kite, the Modesto population of song sparrow, and other protected bird species. Construction activities would likely

occur in the summer months, which would coincide with the nesting bird season (February 1 to September 15). Construction activities could result in disturbance of birds nesting in the mature trees and vegetation on the project site, potentially resulting in abandonment or failure of active nests containing eggs, chicks, or fledglings that are still dependent upon the nest and subsequent loss of young. As discussed above, birds nesting in riparian habitat in the Parkway greater than 100 feet from the project site would not experience elevated maximum noise levels during construction but could experience temporary, infrequent increases in ambient noise levels relative to the average levels. The line of mature trees along the southeastern boundary of the project site would largely block the line of sight of construction activities from any nests in the Parkway. Failure of active nests on the project site due to construction would be a **potentially significant** impact to nesting and/or protected bird species.

Construction activities during the summer months could cause indirect impacts to bats if construction disturbance (e.g., construction-related noise and vibration, 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 and most bat species exhibit high site fidelity, roosting bats are not expected to be present during construction. Therefore, construction activities would have **no impact** to roosting bats.

Operational Impacts

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 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.

Current lighting at Raider Stadium is provided through the use of eight mobile diesel-powered light-emitting diode (LED) light towers, which are not adjustable and provide no ability to regulate light trespass or brightness. The proposed project would replace these existing lights with four permanent 80-foot-tall stadium light poles with LED fixtures at a light temperature of 5,700 Kelvin (K).¹ As discussed in the project description, new lights would have adjustable lighting settings and smaller point-source design, which allow for improved control of light trespass and brightness as compared to the existing field lighting.

The six new 15-foot-tall light poles installed along the existing paved fire lane between the stadium and the main campus parking lot would be located more than 800 feet from the sensitive habitat of the Parkway; therefore, the lights being installed along the fire lane would not affect biological resources.

As described in Section 4.1, “Aesthetics and Visual Resources”, the Parkway is considered for the purposes of this evaluation to be Lighting Zone LZ0/E1, as intrinsically dark with no to very low levels of existing ambient illumination, based on California Code of Regulations Title 24 and Joint International Dark-Sky Association–Illuminating Engineering Society (IES) classifications. As noted in Section 4.1.1, “Environmental Setting,” the

¹ Kelvin measures the color temperature of light. Lower Kelvin values produce warmer light, while higher values produce cooler, daylight-style illumination.

Electric Power Research Institute suggests a recommended maximum illuminance level of 1 lux (0.1 footcandle²) for Lighting Zone E1. At the northernmost edge of the Parkway, coinciding with the levee toe and Jedediah Smith Trail, under the maximum illumination scenario of all 64 circuits operating (as noted above, this is not a realistic scenario but used to demonstrate the maximum potential lighting impact), the proposed project would generate 0.00 vertical and horizontal footcandle (Musco 2026: page 18).

For comparison purposes, typical lighting levels measured horizontally at ground level consist of the following:

- ▶ Clear, sunny daylight: 8,000 to 10,000 footcandles
- ▶ Cloudy sky: 1,000 to 1,500 footcandles
- ▶ Street lighting: from 1 to 2 footcandles
- ▶ Moonlight: 0.03 footcandle

As described in Chapter 3, “Project Description,” the use of nighttime lighting during and following athletic practices would generally end by 8:00 P.M. Nearly all athletic games would end by 10:00 P.M., but no later than 11:00 P.M., with lighting potentially remaining on for a short time afterwards to facilitate safe crowd exiting and for clean-up and other similar activities after game completion. The total number of nighttime games during a calendar year, when the lighting system would be used at full illumination, is estimated to be five to eight (if playoff games are held) home football games; reduced illumination for other games, practices, and events is estimated to be 40 total evening and nighttime events taking place around and after sundown.³ The proposed stadium lighting has been designed to reduce light trespass, glare, and skyglow to the maximum extent feasible using modern technology. Based on the modeling conducted for the proposed lighting, there would be no light trespass off the project site and within the Parkway. The results of lighting modeling demonstrate that no additional nighttime lighting (0.00 footcandle) would be generated by the proposed stadium lights at the northernmost edge of the Parkway, in the areas adjacent to riparian habitat. In addition, the proposed lighting plan for the proposed project was submitted to the International Dark-Sky Association for validation that it meets the criteria in the Community Friendly Outdoor Sports Lighting program. The International Dark-Sky Association assigns either a “pass” or “fail” rating when performing its review.

Artificial lighting can attract some insect prey species and thus some foraging bat and bird species but may also discourage foraging of shyer species trying to avoid predators. Alternatively, artificial light can attract birds and may cause disorientation, which increases susceptibility to predation, especially from nocturnal predators. Exposure to artificial light may disrupt circadian rhythm or alter reproductive behaviors, which can lead to reduced fitness and survival. Evening hours are the main foraging timeframe for most bat species, so increased lighting disturbance from additional activities occurring at the athletic fields during these hours could result in a small loss of foraging habitat when lighting is being used; however, most bird species forage prior to sunset so are unlikely to be impacted by artificial nighttime lighting. Some bat species (e.g., pallid bat) require foraging habitat very near their roosting habitat, so loss of foraging habitat may also result in abandonment of nearby roosts, if any. Increased lighting from athletic 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), or birds during

² A footcandle is a measurement of light intensity. One footcandle is defined as the amount of light necessary to saturate a 1-foot-square area with one lumen of light.

³ This number is derived by totaling the historical average number of regular season home games and home playoff games shown in Table 3-1: Existing and Future (With Proposed Project) Stadium Use in Chapter 3, “Project Description.”

nesting season (February 15–September 15). 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. Modifications to the existing lighting conditions at the project site may cause the high school campus to be less attractive to nesting birds.

A variety of factors would make it unlikely for the project to result in significant impacts to roosting bats or nesting birds. The events that would result in the largest output of artificial lighting would be during the football season, from late August to early November, which is largely outside the typical roosting bat season and nesting bird season. Lighting would not spill into the more suitable habitat within the Parkway, and any species occupying developed areas in the project site would already be accustomed to the presence of night-time artificial lighting. Furthermore, surveys found no indications of roosting bats within the areas of the campus planned for improvements or adjacent trees. Most notably, ample suitable foraging, roosting, and nesting habitat exists located in the surrounding neighborhoods and within riparian habitat to the south along the American River, which would not be impacted by proposed project lighting. Therefore, the operational use of lighting would have a **less than significant** impact on foraging, nesting, or roosting of bats and birds.

Proposed light fixtures have been designed to meet the strict guidelines set by the International Dark-Sky Association and, as such, would ensure glare or skyglow stays at a low level. Fixtures would be primarily directed downward; the poles will have two ball trackers per pole at 16 feet up on the pole and would be used only for football. A ball tracker is a tiny, highly controlled portion of the system that is optimized to project a low-intensity, glare-free beam specifically upward to illuminate the underside of an aerial ball and only targets the path of the ball. 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. The maximum light scenario would occur during football events, primarily from late August to early November, which is outside the flight season for valley elderberry longhorn beetle (March through June) and largely outside the nesting period for birds and maternity season for bats (April 1–August 31). Nighttime artificial light can influence migratory bird stopover site selection, potentially altering stopover density and timing, as well as confuse navigation for nocturnally migrating birds, increasing collision risks and altering foraging opportunities. Although nighttime events using artificial lighting would occur during migration season, the infrequent, short-duration use of the ball tracker light fixtures would minimally contribute to glare or skyglow, all other lighting use would not contribute to glare or skyglow due to the fixtures being directed downward, and lighting would not reach the typical altitude of migrating birds. The altitude of fall migratory bird flights along the west coast (including California, Oregon, and Washington) averages around 2,600 feet, with the highest flights reaching 5,000 to 6,000 feet in altitude (Axelson 2021). Therefore, the impact of operational use of lighting on the movement or migration of wildlife species would be **less than significant**. Although it is not required to mitigate for a less than significant impact, the District will voluntarily bind itself for this impact to implement a mitigation measure requiring the District to obtain a “pass” rating of the proposed stadium lighting system by the International Dark-Sky Association prior to installation of the system. The International Dark-Sky Association “pass” rating of the project’s proposed stadium lighting would indicate the backlight, uplight, and glare generated by the proposed stadium lighting would meet the International Dark-Sky Association’s standards to reduce glare to a level that would not cause annoyance or disruption, and would demonstrate the design’s effectiveness in reducing skyglow to a low level.

Noise

Under existing conditions, some nighttime activities occur and generate noise, with temporary diesel-powered light towers, which also generate localized engine noise during use. The proposed permanent lighting system would not generate noise and would avoid the need for temporary light towers for stadium illumination; however, the permanent lighting would enable additional or expanded evening stadium use, which is the source of the potential operational noise effect.

Increased noise levels associated with proposed project improvements are expected to result from replacement of the existing public address system with a new public address system and increases in crowd size and traffic volume during higher-attendance events. The proposed improvements would enable some larger events, including five to eight football games, a graduation ceremony, and up to eight school assemblies and other events each year, potentially increasing both the frequency and magnitude of noise-generating activities relative to existing conditions (see Table 3-1). Large events would be intermittent and would not produce continuously increased noise levels. The frequency and attendance of smaller events, such as sports practices and lacrosse, soccer, and flag football games, would be similar to current conditions.

As described above and detailed in Section 4.3, “Noise and Vibration,” of this EIR, acoustic measurements were taken during daytime school hours and evening ambient conditions to determine the baseline ambient noise level in the project site and vicinity. Results for the existing noise environment along the trail south of the project site, at ST-03, indicated that L_{eq} is approximately 55 dBA and the L_{max} is approximately 84 dBA. No evening noise measurements were collected south of the project site. In addition, reference measurements were taken during a Rio Americano High School football game hosted at nearby El Camino High School, which has comparable conditions to Rio Americano High School, to understand potential noise conditions that may result from the proposed project. Although site-specific conditions differ between El Camino High School and Rio Americano High School, these measurements are representative of the type and intensity of noise generated during the largest possible nighttime high school football games (for reference, the attendance was approximately 3,000 people, which is greater than the proposed capacity under the proposed project). Results show that average noise levels (L_{eq}) ranged from 65 to 78 dBA, with corresponding maximum levels (L_{max}) of 79 to 93 dBA, depending on proximity to the crowd and speaker systems. Please refer to the “Existing Noise Environment” and “Reference Measurements” sections of Section 4.3, “Noise and Vibration,” for further information on noise analysis.

Suitable habitat for special-status species is located within the American River Parkway, near the Jedediah Smith Memorial Trail, approximately 100 feet south of the project site. Using a standard point-source attenuation rate of 6 dBA per doubling distance, the estimated average levels of noise (L_{eq}) during football games would attenuate to approximately 59 to 72 dBA L_{eq} at 100 feet. Compared to the measured ambient daytime level of 55 dBA L_{eq} along the American River Trail at ST-03, the predicted level of noise at the edge of riparian habitat in the Parkway during stadium events would range from approximately 4 dBA to 17 dBA above ambient daytime conditions. The maximum reference noise levels during football games would attenuate to approximately 73 to 87 dBA L_{max} at 100 feet, which would be similar to the measured daytime maximum noise level of 78 dBA L_{max} under existing conditions.

Therefore, stadium event noise, particularly during high-attendance events, may result in intermittent increases of sound above ambient daytime levels but similar to daytime maximum noise levels in suitable habitat south of the project site. However, the increase in sound levels would not be continuous and would be limited to event occurrence, so the duration of increased noise exposure would be short-term and infrequent. With limited

exposure time, the risk of increased noise resulting in short-term or permanent hearing loss for local wildlife is also limited.

Anthropogenic noise can result in potential impacts to wildlife's survival and fitness. Increased noise levels can increase psychological stress, disrupt behavioral patterns (e.g., reduce foraging time spent in a certain area or increase vigilance and avoidance in an area), cover critical environmental sound cues (e.g., interfere with the ability to detect prey or mask the sound of approaching predators). Increased noise levels could potentially 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. Overwintering pond turtles brumate in the muddy bottom of ponds or marshes, or burrow into soft substrates like sand or mud soft. Brumating pond turtles are settled into semi-subterranean or subterranean areas and would likely be buffered from increased noise. Further, the sensitive, non-mobile stages of northwestern pond turtles (overwintering or nesting) would not occur within 100 feet of the project site. Roosting was not detected at the project site, and more suitable nesting trees are available in close proximity to the project site, which provide alternative roost and nest opportunities. Events at the stadium already occur, and new stadium events would be limited to five to eight football games, a graduation ceremony, and up to eight school assemblies each year, many of which would occur outside the timeframes during which sensitive life stages of special-status species may be present in the vicinity (i.e., nesting bird season [February 1 through September 15], northwestern pond turtle nesting season [May through July]). In addition, the projected sound levels noise would result in minor, intermittent, noncontinuous effects to special-status or protected wildlife species and would be similar to existing maximum noise levels in the area. This impact would be considered **less than significant**.

It should also be noted that Mitigation Measure 4.3-1b, identified in Section 4.3, "Noise and Vibration," would further reduce operational noise levels by requiring a distributed public address system design with operational controls, restrictions on artificial noisemakers, limits on amplified music and band activity after 10:00 p.m., and bleacher/ramp noise controls where feasible.

Construction Mitigation Measures

The following mitigation measures are required prior to and during project construction:

Mitigation Measure 4.2-1a: Environmental Awareness Training.

A qualified biologist will provide environmental awareness training to the construction lead, construction foreman, crew leader, and any project 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 4.2-1b: Best Management Practices for Biological Resources

- Construction staging, storage, and parking areas will be within previously developed areas in the existing school campus, such as the stadium, adjacent athletic fields, or paved parking areas. No staging or stockpiling will occur outside of the Rio Americano High School property boundary.

- All equipment will be maintained to prevent leakage of vehicle fluids such as gasoline, oils, or solvents. 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. Discharge of pollutants into storm drains from vehicle and equipment cleaning will be prohibited.
- Construction-related trenches and holes shall be covered at the end of each workday and/or fitted with an escape ramp of sufficient strength and grade for successful wildlife escape. All construction-related excavations will be thoroughly inspected for the presence of wildlife once per day and prior to being filled. A qualified biologist will be on-call to advise or assist with relocating any entrapped wildlife, as necessary.
- All food-related trash items, such as wrappers, cans, bottles, and food scraps, will be disposed of in closed containers and removed from the construction site at least once daily at the end of each working day.

Mitigation Measure 4.2-1c: Blue Elderberry Avoidance.

Prior to project construction, all blue elderberry shrubs within 165 feet of the proposed project construction footprint will be flagged or otherwise marked for avoidance (e.g., staked, fenced) under supervision of a qualified biologist. Construction activity will have an avoidance area of at least 20 feet from the dripline (i.e., the area directly under the outer circumference of a shrub's branches) of existing blue elderberry shrubs. A qualified biologist will monitor all work within the 20-foot avoidance buffer to ensure blue elderberry shrubs are not inadvertently damaged during construction activities.

Mitigation Measure 4.2-1d: Northwestern Pond Turtle Protections.

- **Preconstruction Surveys:** A qualified biologist will survey the project site for northwestern pond turtles no more than 48 hours before the initiation of construction activities. The existing chain link fence will be surveyed to assess whether it sufficiently excludes turtles from the project site, or if holes or openings in and under fencing are present. If the fence is determined to be insufficient, exclusionary devices shall be employed (wood planks, wire mesh repair, etc.).
- **Northwestern Pond Turtle Encounters:** If any life stage of 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.

Mitigation Measure 4.2-1e: Nesting Bird Protections.

- **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]).

- **Nest Avoidance:** If the qualified biologist observes an active nest within the project site or surrounding areas, the qualified biologist will prescribe and establish an appropriate no-disturbance buffer between the nest and active construction. 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. If an active nest is discovered during the course of construction, the same baseline monitoring will be conducted to establish a buffer. 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 the necessary buffer distance to avoid distress or unusual behaviors 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

Construction

As discussed above, construction activities during implementation of the proposed project could result in impacts to valley elderberry longhorn beetles, nesting birds, or northwestern pond turtles, if present within or near the project site, without implementation of avoidance or minimization measures.

Mitigation Measures 4.2-1a through 4.2-1e provide appropriate actions to avoid and minimize potential impacts during construction on special-status and other protected species, including valley elderberry longhorn beetle, northwestern pond turtle, Swainson's hawk, white-tailed kite, and song sparrow. These measures include education of on-site workers about biological resources at the project site and best management practices to minimize the potential for spills or other indirect impacts to these resources. Species-specific impacts would be avoided through implementation of no-disturbance buffers around suitable habitat for valley elderberry longhorn beetle and nests located during preconstruction surveys, and monitoring construction activities occurring near these resources.

Therefore, with the implementation of Mitigation Measures 4.2-1a through 4.2-1e, the potential construction impacts to any protected or special-status species would be **less-than-significant with mitigation incorporated**.

Additionally, the District will voluntarily bind itself to obtain a "pass" rating from the International Dark-Sky Association. Prior to the start of construction, the District shall submit the proposed lighting design to the International Dark Sky Association for a Design Analysis and request a determination as to whether the design meets the program guidelines. Should the design not meet the program guidelines, the District will refine and

resubmit until the design receives a “pass” rating. The approved designs would be validated through receipt of an International Dark-Sky Association approval letter. Construction shall not commence until the design receives the “pass” rating and approval letter. Implementation of this mitigation would further support the **less-than-significant** impact.

Impact 4.2-2: 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 Wildlife or US Fish and Wildlife Service?

The proposed project would not result in the loss or modification of any sensitive natural communities, such as protected wetlands, rivers, or riparian habitats. 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 100 feet of 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, with numerous mature deciduous and evergreen trees lining the southern boundary of the campus. Riparian habitat is present in the Parkway 100 feet south of the project site and would not be removed during project construction. Furthermore, the riparian habitat would not be indirectly impacted by project construction because no acutely hazardous materials would be used or stored at the project site or the construction staging area, and all construction materials and equipment would be properly maintained and stored in previously developed areas. Therefore, the proposed project would result in **no impact** to riparian habitat or other sensitive natural communities.

Impact 4.2-3: 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, the proposed project would result in **no impact** on any federally protected wetlands.

Impact 4.2-4: Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

The proposed improvements would not substantially interfere with the movement of any native or migratory fish or wildlife species, nor would the proposed improvements affect movement along established wildlife corridors (i.e., the Parkway). The proposed project would not create any new barriers to movement in riparian and aquatic habitat corridors along the American River. As discussed under Impact 4.2-1 above, the proposed project would remove existing lighting and install lighting that would be designed to avoid light spillage. Proposed light fixtures have been designed to meet the strict guidelines set by the International Dark-Sky Association and, as such, would ensure glare or skyglow stays at a low level. Fixtures would be primarily directed downward; the poles will have two ball trackers per pole at 16 feet up on the pole and would be used only for football. The limited use of the ball tracker light fixtures would minimally contribute to glare or skyglow during the infrequent and short duration of use, and all other lighting use would not contribute to glare or skyglow due to the fixtures being directed downward, so bird migration is not expected to be affected. 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. The maximum light scenario would occur during football events, primarily from late August to early November, which is outside the flight season for valley elderberry longhorn beetle (March through June). Therefore, the operational lighting would result in **no impact** on the movement of any native resident or migratory fish or wildlife species or use of wildlife corridors.

As discussed under Impact 4.2-1 above, potential impacts from operational increase in noise levels would be constrained to event occurrences, so the duration of increased noise exposure would be short-term and infrequent and the magnitude would be similar to maximum measured noise levels under existing conditions. With limited exposure time, and moderately dense vegetation present in the Parkway that may buffer sound and reduce the distance that noise-related effects can travel, the potential for impacts to wildlife species would be minimal. Dispersing or foraging individuals of protected wildlife species are mobile and would be expected to move to avoid disturbance, if necessary. Therefore, the operational noise levels would result in **less than significant** impacts on the movement of any native resident or migratory fish or wildlife species or use of wildlife corridors.

Though the proposed project site does not contain any native wildlife nursery sites, suitable riparian nesting habitat for birds and northwestern pond turtles is present in the Parkway, approximately 100 feet from the project site's southern boundary. As discussed under Impact 4.2-1 above, noise generation during construction and operation of the proposed project is unlikely to disrupt nesting because maximum noise levels would be infrequent, would mostly occur outside the nesting season of special-status species, and would be within the range of measured maximum noise levels under existing conditions. Therefore, project impacts on native wildlife nursery sites would be **less than significant**.

Impact 4.2-5: Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

Native oak trees within the unincorporated area of Sacramento County are protected by the *Sacramento County Tree Preservation Ordinance* and the *Sacramento County General Plan* Conservation Element. No tree removal is planned as part of the project, but project construction activities may encroach into the root zone of four valley oak trees that line the boundary of the Rio Americano High School campus south of the stadium. As discussed above in Section 4.2.2, "Regulatory Setting," the SJUSD is not subject to local policies and ordinances, so project construction would not conflict with the *Sacramento County Tree Ordinance*, and there would be **no impact**. Nevertheless, in consideration of regional policies, the District has designed the project to avoid removal of trees and will implement the following measures as part of the project, as noted in Chapter 3, "Project Description," to avoid and minimize potential construction impacts to native oak trees. The District will require implementation of the following tree impact avoidance measures as a part of the contract(s) to improve the Raider Stadium facilities. All native trees, as identified by a qualified biologist, 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.

Impact 4.2-6: 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 (HCP) or Natural Community Conservation Plan (NCCP). The boundaries of the plan areas for the Natomas Basin HCP, the South Sacramento HCP, the Western Placer County HCP/NCCP, and the Yolo HCP/NCCP were reviewed, and the project site is not included within the service area of any of these plans.

As described above in Section 4.2.2, "Regulatory Setting," the principal focus of wild and scenic river management plans, such as the Parkway Plan, are on the management of lands and waters within the boundaries of a wild and scenic river and, as such, policies contained in the Parkway Plan do not directly apply to the proposed project site. Nonetheless, due to the project site's proximity to the Parkway, the applicable goals and policies related to biological resource protection were considered, consistent with the Parkway Plan Policy 7.5 that directs that "[p]rivately owned parcels may be developed consistent with local zoning [and p]arcels should not be rezoned to encourage further development" and Policy 7.19 that directs that "jurisdictions shall use their authority to reduce, eliminate, and/or mitigate potential adverse impacts upon the Parkway caused by adjacent land uses and activities."

The Parkway Plan includes policies for resource preservation, use, and development of the Parkway, including protection of riparian habitats, wildlife corridors, and recreational resources, and establishment of setbacks and restrictions for projects near the Parkway. The primary goal of the Parkway Plan related to biological resources is to preserve, protect, and improve the natural resources of the Parkway, including adequate flow of high-quality water, anadromous and resident fishes, migratory and resident wildlife, and diverse natural vegetation. The policies contained in the Parkway Plan do not directly apply to the proposed project site, which is already

developed with existing athletic facilities associated with the Rio Americano High School and does not include the biologically sensitive habitats of the Parkway. Nevertheless, as detailed through Impacts 4.2-1 through 4.2-4, above, project implementation would not impact habitat quality or quantity within the Parkway, including water quality in the American River, migratory corridors, or riparian vegetation. The project would not conflict with policies related to habitat connectivity or habitat for special-status species since the campus is already fully developed and the project does not affect any habitat for special-status species or any wildlife corridors. The project would not conflict with policies related to the protection of plants or wildlife since the project does not propose to remove any trees, the project site is a fully developed high school campus, and the project proposes minor temporary disturbance of very small portions of the site and a minor shift in ongoing operations on-site. The project would not conflict with any policies from the Parkway Plan related to limiting outdoor lighting since, as detailed in Impact 4.2-1, the project is designed consistent with rigorous standards that avoid light spillage, glare, and skyglow. Therefore, implementation of the proposed project would not conflict with the policies contained in the Parkway Plan.

Therefore, the proposed project would result in **no impact** related to consistency with any adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

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4.3 NOISE AND VIBRATION

4.3.1 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, as well as from recreational users of the Parkway south of the project site. 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 as well as 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. Consideration of noise as it pertains to the biological resources of the Parkway is discussed in Section 4.2, “Biological Resources.”

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, three short-term (20-minute) measurements (ST-01, ST-02, and ST-03) and one long-term (24-hour) measurement (LT-01) were taken at representative receptor locations on September 17 and 18, 2025. The measurements reflect both daytime school-related activities and evening ambient conditions

influenced by nearby residential neighborhoods and the Parkway. The results confirm that the existing acoustic environment is primarily shaped by vehicle traffic, school operations, neighborhood activity, and sounds from the Parkway.

Additional measurements conducted during evening girls' soccer games in February 2026 were used to characterize existing sporting event noise conditions and to provide a comparison to the higher-noise football game reference measurements used for the conservative operational stadium noise analysis.

Measured ambient noise levels in the vicinity of the project site ranged from 51 to 62 dBA L_{eq} during daytime hours, with corresponding maximum noise levels ranging from 66 to 86 dBA L_{max} . The long-term measurement adjacent to the residences east of the stadium recorded a daytime average of 51 dBA L_{eq} , a nighttime average of 46 dBA L_{eq} , and a 24-hour L_{dn} of 53 dBA. These results indicate relatively low nighttime background noise compared to daytime conditions and establish the baseline against which construction and operational noise impacts of the proposed stadium improvements are evaluated.

The results of the noise survey are shown in Table 4.3-1. Exhibit 4.3-1 shows the locations of the ambient noise measurement sites.

Table 4.3-1. Summary of Ambient Noise Level Survey Results in the Vicinity of the Project Site

Site	Location	Date	Time	Duration	Measured Sound Level, dBA Daytime (7 a.m.–7 p.m.) L_{eq}	Measured Sound Level, dBA Daytime (7 a.m.–7 p.m.) L_{max}	Measured Sound Level, dBA Nighttime (7 p.m.–7 a.m.) L_{eq}	Measured Sound Level, dBA Nighttime (7 p.m.–7 a.m.) L_{max}	dBA, L_{dn}
LT-1	On site, along the fence by residences to the east	9-17/18-2025	14:15	24 Hour	51	66	46	54	53
ST-01	On site, north of project site by residences along American River Drive	9-17-2025	14:33	0:20	57	86	NA	NA	NA
ST-02	On site, west of project site by school basketball fields	9-17-2025	14:04	0:20	62	75	NA	NA	NA
ST-03	Off site, south of project site by American River Trail	9-17-2025	15:13	0:20	55	84	NA	NA	NA

Notes: dBA = A-weighted decibels; L_{eq} = equivalent sound level (the sound energy averaged over a continuous period of time); L_{max} = maximum instantaneous sound level; ST = short-term measurement

Noise-level measurements were completed using a Larson Davis Laboratories (LDL) Model 820 and 824 precision integrating sound-level meters. The meter was calibrated before the measurements using an LDL Model CAL200 acoustical calibrator. The meter was programmed to recorded A-weighted sound levels using a "slow" response. The equipment used complies with all pertinent requirements of the American National Standards Institute for Class 1 sound-level meters (ANSI S1.4).

Source: Data compiled by AECOM in 2025



Exhibit 4.3-1 Ambient Noise Survey

Noise measurements conducted on February 4 and 5, 2026, during evening girls' soccer games at Rio Americano High School were collected to document representative stadium activity noise under existing event conditions and to supplement the ambient noise survey. Three long-term measurements were conducted during the monitoring period, and short-term attended measurements were conducted at the northern, western, and southern edges of the field and at a farther-distance location south of the field. The February 2026 soccer game measurements are summarized in Table 4.3-2. Exhibit 4.3-2 shows the locations of the reference game noise measurement sites.

Table 4.3-2. Summary of Evening Soccer Game Noise Measurements at Rio Americano High School

Site	Location	Date	Time	Duration	Measured Sound Level, dBA Daytime (7 a.m.–7 p.m.) L _{eq}	Measured Sound Level, dBA Daytime (7 a.m.–7 p.m.) L _{max}	Measured Sound Level, dBA Nighttime (7 p.m.–7 a.m.) L _{eq}	Measured Sound Level, dBA Nighttime (7 p.m.–7 a.m.) L _{max}	dBA, L _{dn}
LT-1	South of the project site, across the American River, near residences south of the river	2-4/5-2026	14:00	24 Hour	46.6	62.9	47	58	54
LT-2	Along the eastern stadium/campus fence line adjacent to residences east of the project site	2-4/5-2026	15:00	24 Hour	53.5	68.1	48	57	56
LT-3	North of the project site near residences along American River Drive	2-4/5-2026	15:00	24 Hour	62.2	76.3	53	70	62
ST-01-Game	Northern edge of the field; first game measurement period	2-4-2026	15:09	0:15	58.5	73.2	NA	NA	NA
ST-02-Game	Western edge of the field; first game measurement period	2-4-2026	15:32	0:15	52.8	66.7	NA	NA	NA
ST-03-Game	Southern edge of the field; first game measurement period	2-4-2026	15:50	0:15	52.7	67.8	NA	NA	NA

Site	Location	Date	Time	Duration	Measured Sound Level, dBA Daytime (7 a.m.–7 p.m.) Leq	Measured Sound Level, dBA Daytime (7 a.m.–7 p.m.) Lmax	Measured Sound Level, dBA Nighttime (7 p.m.–7 a.m.) Leq	Measured Sound Level, dBA Nighttime (7 p.m.–7 a.m.) Lmax	dBA, Ldn
ST-04-Game	Southern edge of the field; second game measurement period	2-4-2026	17:12	0:15	63.7	75.8	NA	NA	NA
ST-05-Game	Western edge of the field; second game measurement period	2-4-2026	17:31	0:15	59.9	70.5	NA	NA	NA
ST-06-Game	Northern edge of the field; second game measurement period	2-4-2026	17:57	0:20	63.8	79.0	NA	NA	NA
ST-07-Game	South of the field, across the American River, near residences south of the river; farther-distance game measurement	2-4-2026	18:42	0:17	59.5	74.8	NA	NA	NA

Notes: dBA = A-weighted decibels; L_{eq} = equivalent sound level (the sound energy averaged over a continuous period of time); L_{max} = maximum instantaneous sound level; ST = short-term measurement

Several short-term game measurements were conducted at the same locations during the games. Therefore, ST-01/ST-06, ST-02/ST-05, and ST-03/ST-04 represent repeated measurements at the northern, western, and southern field-edge areas, respectively, during different measurement periods. LT-1 and ST-07 were located south of the project site, across the American River, near residences south of the river. Noise-level measurements were completed using a Larson Davis Laboratories (LDL) Model 820 and 824 precision integrating sound-level meters. The meter was calibrated before the measurements using an LDL Model CAL200 acoustical calibrator. The meter was programmed to recorded A-weighted sound levels using a “slow” response. The equipment used complies with all pertinent requirements of the American National Standards Institute for Class 1 sound-level meters (ANSI S1.4).

Source: Data compiled by AECOM in 2026

TRAFFIC NOISE

Traffic noise is the dominant noise source around the project site. American River Drive is the major roadway near the project site, and Saverien Drive is a primary route from the project site north to Fair Oaks Boulevard. Existing vehicle traffic noise levels near the project site were modeled using the Federal Highway Administration (FHWA) Highway Traffic Noise Prediction Model (FHWA-RD-77-108) and traffic data collected to define existing traffic levels (see Section 4.4, “Transportation and Circulation” of this EIR).¹

¹ The FHWA model is based on CALVENO reference noise factors for automobiles, medium trucks, and heavy trucks, with consideration given to vehicle volume, speed, roadway configuration, distance to the receptor, and ground attenuation factors.



Exhibit 4.3-2 Existing Game Noise Survey

The measured short-term soccer game noise levels ranged from 52.7 to 63.8 dBA L_{eq} and 66.7 to 79.0 dBA L_{max} around the field. At the farther-distance southern measurement location, noise levels during the evening soccer game were 59.5 dBA L_{eq} and 74.8 dBA L_{max} . These levels are lower than the reference football game measurements from El Camino High School, which ranged from 65 to 78 dBA L_{eq} and 79 to 93 dBA L_{max} near the crowd, bleacher, and public address/announcer areas. The February 2026 soccer game measurements provide representative data for existing noise conditions during use of the existing Raider Stadium for typical events under current operations, without implementation of the proposed project.

Table 4.3-3 summarizes the modeled existing traffic noise levels, providing noise levels at 30, 50, 70, and 100 feet from the centerline of each major roadway in the immediate vicinity of the project site, and lists distances from the roadway centerlines to the 65 dB L_{dn} traffic noise contours. These traffic noise modeling results are based on existing average daily traffic (ADT) volumes provided in the transportation analysis prepared to support this EIR (Kimley-Horn 2026). As shown in Table 4.3-3, the location of the 65 dB L_{dn} contour ranges from 64 to 79 feet from the centerline of the modeled roadways. Table 4.3-4 summarizes the modeled traffic noise levels for the same representative roadway segments and noise contour distances, but for the existing peak-hour traffic volumes. The extent to which receptors in the vicinity of the project site are affected by existing traffic noise depends on their respective proximity to the roadways and their individual sensitivity to noise.

Table 4.3-3. Summary of Modeled Levels of Existing Traffic Noise (Average Daily Traffic [ADT])

Roadway	From	To	Distance (feet) to L_{dn} 65 dB	Noise Level (L_{eq} [dB]) at 30 feet	Noise Level (L_{eq} [dB]) at 50 feet	Noise Level (L_{eq} [dB]) at 70 feet	Noise Level (L_{eq} [dB]) at 100 feet
American River Drive	Morris Way	Saverien Drive	79	69.2	67.0	65.5	64.0
American River Drive	Saverien Drive	Wixford Way	79	69.2	67.0	65.5	64.0
Saverien Drive	Fair Oaks Boulevard	American River Drive	64	68.3	66.1	64.6	63.1

Notes: dB = A-weighted decibels; L_{dn} = day-night average noise level; L_{eq} = an average of the sound energy occurring over a specified time period.

Source: Data modeled by AECOM in 2026

Table 4.3-4. Summary of Modeled Levels of Existing Traffic Noise (Peak-Hour Volume)

Roadway	From	To	Distance (feet) to L_{eq} 65 dB	Noise Level (L_{eq} [dB]) at 30 feet	Noise Level (L_{eq} [dB]) at 50 feet	Noise Level (L_{eq} [dB]) at 70 feet	Noise Level (L_{eq} [dB]) at 100 feet
American River Drive	Morris Way	Saverien Drive	102	70.3	68.1	66.7	65.1
American River Drive	Saverien Drive	Wixford Way	121	71.1	68.8	67.4	65.8
Saverien Drive	Fair Oaks Boulevard	American River Drive	117	70.9	68.7	67.2	65.7

Notes: dB = A-weighted decibels; L_{dn} = day-night average noise level; L_{eq} = an average of the sound energy occurring over a specified time period.

Source: Data modeled by AECOM in 2026

REFERENCE MEASUREMENTS

To better understand potential noise conditions under the proposed project, specifically during potential peak noise events with implementation of the proposed project, reference measurements were taken during a home Rio

Americano High School football game hosted at El Camino High School (4300 El Camino Avenue, Sacramento) on August 29, 2025. This game represents the peak attendance of any home game over the 2024 and 2025 seasons, with an attendance of approximately 3,300 people. The game began at approximately 7:30 p.m. Eight-hour measurements began at 4:00 p.m., and short-term measurements were conducted during the evening game period. The eight-hour measurements include pre-game and other lower-activity periods before the game and therefore provide longer-duration context but may understate noise levels during the active game period. The short-term measurements conducted during the active game period, beginning at approximately 7:32 p.m., 8:02 p.m., and 8:27 p.m., better represent game-period noise conditions. These active game-period measurements ranged from 66.3 to 77.7 dBA L_{eq} , 78.7 to 89.7 dBA L_{max} , and 63.5 to 76.9 dBA L_{50} . The monitoring locations were selected to capture noise exposure adjacent to the bleachers, near the public address system and announcer booth, 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 to 66 dBA L_{eq} , with the active game-period measurement at the northeastern corner of the field recording 66.3 dBA L_{eq} and 63.5 dBA L_{50} . These levels reflect conditions experienced near residential property lines, approximately 50 feet from the crowd seating areas and within the general area influenced by the PA system and spectator activity, during an evening game. In contrast, locations adjacent to the public address system and announcer booth recorded higher average levels of 75 to 78 dBA L_{eq} , illustrating the influence of amplified sound and concentrated crowd activity. Although site-specific conditions differ between El Camino High School and Rio Americano High School, these measurements are representative of the type and intensity of noise generated during nighttime high school football games.

4.3.2 REGULATORY SETTING

While the following regulatory regime does not directly apply to the proposed project, the underlying analysis provides a useful context for understanding the impacts of environmental noise on people.

Federal

U.S. Environmental Protection Agency Noise Control Act

The U.S. Environmental Protection Agency (EPA), Office of Noise Abatement and Control, was originally established to coordinate federal noise control activities. After inception, EPA's Office of Noise Abatement and Control issued the federal Noise Control Act of 1972, establishing programs and guidelines to identify and address the effects of noise on public health and welfare and the environment. Administrators of EPA determined in 1981 that subjective issues such as noise would be better addressed at lower levels of government. Consequently, in 1982 responsibilities for regulating noise control policies were transferred to state and local governments. However, noise control guidelines and regulations contained in the rulings by EPA in prior years remain upheld by designated federal agencies, while allowing more individualized control for specific issues by designated federal, state, and local government agencies.

U.S. Department of Transportation and U.S. EPA Vibration Guidelines

To address the human response to groundborne vibration, the Federal Transit Administration (FTA) of the U.S. Department of Transportation has set forth guidelines for maximum-acceptable vibration criteria for different types of land uses. These include 65 VdB for land uses where low ambient vibration is essential for interior

operations (e.g., hospitals, high-tech manufacturing, laboratory facilities); 80 VdB for residential uses and buildings where people normally sleep; and 83 VdB for institutional land uses with primarily daytime operations (e.g., schools, churches, clinics, offices) (FTA 2018).

Standards have also been established to address the potential for groundborne vibration to cause structural damage to buildings. These standards were developed by the Committee of Hearing, Bio Acoustics, and Bio Mechanics (CHABA) at the request of the EPA (FTA 2018). For fragile structures, CHABA recommends a maximum limit of 0.25 in/sec PPV (FTA 2018).

State

Governor's Office of Land Use and Climate Innovation

The *State of California General Plan Guidelines 2017*, published by the California Governor's Office of Planning and Research (OPR) (now the Governor's Office of Land Use and Climate Innovation [LCI]), provides guidance for the acceptability of projects within areas of specific noise exposure ranges. Table 4.3-5 presents acceptable and unacceptable community noise exposure limits for various land use categories (OPR 2017). The guidelines also present adjustment factors that may be used to arrive at noise acceptability standards that reflect the noise control goals of the community, the particular community's sensitivity to noise, and the community's assessment of the relative importance of noise pollution.

Table 4.3-5. LCI Land Use Noise Compatibility Guidelines (L_{dn} , dB)

Land Use Category	Normally Acceptable ¹	Conditionally Acceptable ²	Normally Unacceptable ³	Clearly Unacceptable ⁴
Residential-Low Density Single Family, Duplex, Mobile Home	<60	55–70	70–75	75+
Residential-Multiple Family	<65	60–70	70–75	75+
Transient Lodging, Motel, Hotel	<65	60–70	70–80	80+
School, Library, Church, Hospital, Nursing Home	<70	60–70	70–80	80+
Auditorium, Concert Hall, Amphitheater		<70	65+	
Sports Arenas, Outdoor Spectator Sports		<75	70+	
Playground, Neighborhood Park	<70		67.5–75	72.5+
Golf Courses, Stable, Water Recreation, Cemetery	<75		70–80	80+
Office Building, Business Commercial, and Professional	<70	67.5–77.5	75+	
Industrial, Manufacturing, Utilities, Agriculture	<75	70–80	75+	

Notes: dB = A-weighted decibels; L_{dn} = day-night average noise level; LCI = California Governor's Office of Land Use and Climate Innovation.

¹ Specified land use is satisfactory, based on the assumption that any buildings involved are of normal conventional construction, without any special noise insulation requirements.

² New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning will normally suffice.

³ New construction or development should generally be discouraged. If new construction or development does proceed, a detailed analysis of the noise reduction requirements must be made and needed noise insulation features included in the design. Outdoor areas must be shielded.

⁴ New construction or development should generally not be undertaken.

Source: OPR 2017

California Department of Transportation

The Caltrans Transportation and Construction Vibration Guidance Manual provides guidance for construction vibration. This includes guidance for annoyance potential criteria (i.e., the potential to annoy nearby humans) and damage potential threshold criteria (i.e., the potential to damage nearby structures). These criteria are presented in

terms of PPV in in/sec. These standards are more stringent than the recommended guidelines established by the FTA, presented above. Table 4.3-6 shows potential criteria for vibration annoyance, and Table 4.3-7 shows the general thresholds for structural responses to vibration levels.

Table 4.3-6. Human Responses to Vibration Levels, Peak Vibration Threshold (in/sec PPV)

Human Response	Maximum PPV for Transient Sources (in/sec)	Maximum PPV for Continuous/Frequent Intermittent Sources (in/sec)
Barely Perceptible	0.04	0.01
Distinctly Perceptible	0.25	0.04
Strongly Perceptible	0.9	0.1
Severe	2.0	0.4

Notes: in/sec = inches per second; PPV = peak particle velocity
Source: Caltrans 2020

Table 4.3-7. Structural Responses to Vibration Levels, Peak Vibration Threshold (in/sec PPV)

Structure and Condition	Peak Vibration Threshold (in/sec PPV) Transient Sources	Peak Vibration Threshold (in/sec PPV) Continuous/Frequent Intermittent Sources
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1.0	0.5
Modern industrial/commercial buildings	2.0	0.5

Notes: in/sec = inches per second; PPV = peak particle velocity
Source: Caltrans 2020

Ambient Community Noise Environment Degradation

Using a single value to evaluate an impact relating to a noise-level increase does not account for the existing ambient noise environment (e.g., roads) to which people have become accustomed. Studies assessing the percentage of people who are highly annoyed by changes in ambient noise levels indicate that when ambient noise levels are low, a greater change is needed to cause annoyance. As ambient noise levels increase, a smaller change in noise level is required to elicit significant annoyance. In community noise assessments (e.g., general plans, noise ordinances), noise impacts are generally not considered significant under CEQA if no noise-sensitive sites are located in the vicinity of the project, or if increases in ambient noise levels associated with implementation of the project (construction and operation) would not exceed +3 dB at noise-sensitive locations near the project (Caltrans 2013).

The significance criteria outlined in Table 4.3-8 correlate to human responses to changes in ambient noise levels and assess degradation of the ambient community noise environment.

Table 4.3-8. Significant Change in Ambient Noise Levels

Existing Ambient Noise Level, $L_{dn}/CNEL$	Significant Increase
<60 dB	+ 5 dB or greater
>60 dB	+ 3 dB or greater

Notes: CNEl = Community Noise Equivalent Level; dB = A-weighted decibels; L_{dn} = day-night average noise level.
Source: FICON 1992, and Caltrans 2013.

Local

Although County policies and standards do not directly apply to the project, the research underpinning these policies is useful for understanding project impacts, and these policies and standards are used, in part, in the noise assessment provided in this section.

Sacramento County General Plan

The Noise Element of the *County of Sacramento General Plan* (Sacramento County 2017) contains specific goals and policies for evaluating a proposed project's compatibility with surrounding land uses. The following goals and policies are related to noise.

- **Policy NO-1:** The noise level standards for noise-sensitive areas of *new* uses affected by traffic or railroad noise sources in Sacramento County are shown in Table 1 [Table 4.3-9 of this DEIR]. Where the noise level standards of Table 1 [Table 4.3-9 of this DEIR] are predicted to be exceeded at new uses proposed within Sacramento County which are affected by traffic or railroad noise, appropriate noise mitigation measures shall be included in the project design to reduce projected noise levels to a state of compliance with the Table 1 [Table 4.3-9 of this DEIR] standards.

Table 4.3-9. Noise Standards for New Uses Affected by Traffic and Railroad Noise

New Land Use	Sensitive ¹ Outdoor Area - L _{dn}	Sensitive Interior ² Area - L _{dn}	Notes
All Residential	65	45	5
Transient Lodging	65	45	3,5
Hospitals & Nursing Homes	65	45	3, 4, 5
Theaters & Auditoriums	---	35	3
Churches, Meeting Halls, Schools, Libraries, etc.	65	40	3
Office Buildings	65	45	3
Commercial Buildings	---	50	3
Playgrounds, Parks, etc.	70	---	
Industry	65	50	3

Notes: L_{dn} = day-night average noise level.

1. Sensitive areas are defined in acoustic terminology section.
2. Interior noise level standards are applied within noise-sensitive areas of the various land uses, with windows and doors in the closed positions.
3. Where there are no sensitive exterior spaces proposed for these uses, only the interior noise level standard shall apply.
4. Hospitals are often noise-generating uses. The exterior noise level standards for hospitals are applicable only at clearly identified areas designated for outdoor relaxation by either hospital staff or patients.
5. If this use is affected by railroad noise, a maximum (L_{max}) noise level standard of 70 dB shall be applied to all sleeping rooms to reduce the potential for sleep disturbance during nighttime train passages.

Source: Sacramento County 2017, Table 1.

- **Policy NO-6:** Where a project would consist of or include non-transportation noise sources, the noise generation of those sources shall be mitigated so as not to exceed the interior and exterior noise level standards of Table 2 [Table 4.3-10 of this Draft EIR] at existing noise-sensitive areas in the project vicinity.
- **Policy NO-8:** Noise associated with construction activities shall adhere to the County Code requirements. Specifically, Section 6.68.090(e) addresses construction noise within the County.

Table 4.3-10. Non-Transportation Noise Standards Median (L_{50}) / Maximum (L_{max})¹

Receiving Land Use	Outdoor Area ² Daytime	Outdoor Area ² Nighttime	Interior ³ Day & Night	Interior ³ Notes
All Residential	55 / 75	50 / 70	35 / 55	
Transient Lodging	55 / 75	---	35 / 55	4
Hospitals & Nursing Homes	55 / 75	---	35 / 55	5, 6
Theaters & Auditoriums	---	---	30 / 50	6
Churches, Meeting Halls, Schools, Libraries, etc.	55 / 75	---	35 / 60	6
Office Buildings	60 / 75	---	45 / 65	6
Commercial Buildings	---	---	45 / 65	6
Playgrounds, Parks, etc.	65 / 75	---	---	6
Industry	60 / 80	---	50 / 70	6

Notes: L_{50} : Median noise level or level exceeded 50% of the time; L_{max} = The highest root-mean-square (RMS) sound level measured over a given period of time.

1. The Table 2 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 of Table 2, 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.
4. Outdoor activity areas of transient lodging facilities are not commonly used during nighttime hours.
5. Hospitals are often noise-generating uses. The exterior noise level standards for hospitals are applicable only at clearly identified areas designated for outdoor relaxation by either hospital staff or patients.
6. The outdoor activity areas of these uses (if any), are not typically utilized during nighttime hours.
7. 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, Table 2.

- **Policy NO-13:** Where noise mitigation measures are required to satisfy the noise level standards of this Noise Element, emphasis shall be placed on the use of setbacks and site design to the extent feasible, prior to consideration of the use of noise barriers.
- **Policy NO-15:** The County shall have the flexibility to consider the application of 5 dB less restrictive exterior noise standards than those prescribed in Tables 1 and 2 [Table 4.3-9 and Table 4.3-10 of this DEIR] in cases where it is impractical or infeasible to reduce exterior noise levels within infill projects to a state of compliance with the Table 1 or 2 [Table 4.3-9 and Table 4.3-10 of this DEIR] standards. In such cases, the rationale for such consideration shall be clearly presented and disclosure statements and noise easements should be included as conditions of project approval. The interior noise level standards of Tables 1 and 2 [Table 4.3-9 and Table 4.3-10 of this DEIR] would still apply. The maximum allowable long-term noise exposure permissible for non-industrial uses is 75 dB.

Sacramento County Code, Noise Control Ordinance

The Sacramento County Code Noise Control Ordinance contains performance standards to prevent unnecessary, excessive and offensive noise levels within the county. Table 4.3-11 and Table 4.3-12. Noise Control Ordinance Cumulative Duration Allowance (dB) include relevant information from the Noise Control Ordinance.

Table 4.3-11. Noise Control Ordinance Zoning District Standards

Noise Area	County Zoning Districts	Time Period	Exterior Noise Standard
1	RE-1, RD-1, RE-2, RD-2, RE-3, RD-3, RD-4, R-1-A, RD-5, R-2, RD-10, R-2A, RD-20, R-3, R-D-30, RD-40, RM-1, RM-2, A-1-B, AR-1, A-2, AR-2, A-5, AR-5	7 a.m.–10 p.m.	55 dB
		10 p.m.–7 a.m.	50 dB

Notes: dB = A-weighted decibels.

Source: Title 6 of the Sacramento County Code, Section 6.68.070

Table 4.3-12. Noise Control Ordinance Cumulative Duration Allowance (dB)

	Cumulative Duration of the Intrusive Sound	Allowance Decibels (dB)
1.	Cumulative period of 30 minutes per hour	0
2.	Cumulative period of 15 minutes per hour	+5
3.	Cumulative period of 5 minutes per hour	+10
4.	Cumulative period of 1 minute per hour	+15
5.	Level not to be exceeded for any time per hour	+20

It is unlawful for any person at any location within the County to create any noise which causes the noise levels on an affected property, when measured in the designated noise area, to exceed for the duration of time set forth following, the specified exterior noise standards in any one hour by that indicated in the table above under the heading, "Cumulative Duration of the Intrusive Sound."

Each of the noise limits specified in subdivision (b) of this section shall be reduced by five dB for impulsive or simple tone noises, or for noises consisting of speech or music.

If the ambient noise level exceeds that permitted by any of the first four noise-limit categories specified in subdivision (b), the allowable noise limit shall be increased in five dB increments in each category to encompass the ambient noise level. If the ambient noise level exceeds the fifth noise level category, the maximum ambient noise level shall be the noise limit for that category.

Notes: dB = A-weighted decibels.

Source: Title 6 of the Sacramento County Code, Section 6.68.070

4.3.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

METHODOLOGY

Noise monitoring conducted at Rio Americano High School is consistent with accepted practices, including use of Type 1 precision sound level meters and adherence to calibration protocols. The analysis assumes 6 dB attenuation per doubling of distance for direct sound propagation and evaluates both average (L_{eq}) and maximum (L_{max}) sound levels at the nearest noise-sensitive receptors. The approach includes a particular focus on football games as the representative worst-case operational scenario, because these events are expected to generate the largest crowds, heaviest use of the PA system, and highest levels of cheering and band activity. This approach is supported by the August 29, 2025 reference football game measurements conducted at El Camino High School, summarized above, and the February 2026 Rio Americano girls' evening soccer game measurements, which provide project-site event noise data for a lower-intensity athletic event.

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.

Although the District is not legally subject to local municipal regulations, including the Sacramento County Noise Ordinance or the County General Plan Noise Element, under CEQA, the lead agency may adopt thresholds of significance from recognized sources when it has not established its own. Because the District has not independently adopted its own noise standards, local County standards serve as a robust, scientifically grounded framework for assessing environmental impacts on nearby sensitive receptors and are therefore considered in this EIR as applicable metrics against which to evaluate potential noise impacts of the proposed project related to land use-noise compatibility. The County's framework aligns with, and draws from well-documented federal and State guidance grounded in established acoustical science, including HUD's noise-compatibility criteria (24 CFR Part 51, Subpart B), the California Building Code's interior noise performance standard for habitable spaces, and State technical guidance such as the Governor's Office of Planning and Research General Plan Guidelines for Noise, as well as U.S. Environmental Protection Agency (EPA) guidelines for community noise exposure in the publication 'Information on the Levels of Environmental Noise Requisite to Protect Public Health and Welfare with an Adequate Margin of Safety' and EPA Model Community Noise Control Ordinance. These guidelines and the County standards and noise ordinance consider impacts of noise exposure to health, sleep, and annoyance outcomes on various land use occupants. Applying these science-based benchmarks provides a reasonable, conservative basis for determining whether project-related construction or operational noise would result in a substantial temporary or permanent change in noise levels and therefore could result in a potentially significant impact, regardless of the District's exemption from County standards and ordinance by regulation.

As described in the *Regulatory Setting* above, 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 and are considered for the determination of potential noise impacts for the purposes of this EIR.

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 (Policy NO-1) (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 4.3-9). Policy NO-9 further establishes that, for pre-project ambient noise conditions of less than 60 dB a 5+dB increase in noise would be considered significant, for pre-project ambient noise conditions of 60 to 65 dB a 3+ dB increase in noise would be considered significant, for pre-project noise conditions of 65+ dB a 1+ dB increase in noise would be considered significant, and that, in no case shall the long-term noise exposure for non-industrial uses be greater than 75 dB L_{dn} .

For non-transportation noise sources, the County has established interior and exterior noise standards for daytime and nighttime hours (Table 4.3-10) (Policy NO-6), which establishes the residential land use outdoor area daytime standards of L_{50} at 55 dB and L_{max} at 75 dB, nighttime standards of L_{50} at 50 dB and L_{max} at 70 dB, and interior day and night standards of L_{50} at 35 dB and L_{max} at 55 dB.

Also noted in the Regulatory Setting above, while not directly applicable to the proposed project, 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; 8:00 p.m. on Friday through and including 7:00 a.m. on Saturday; and 8:00 p.m. on Saturday 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 construction noise between specified hours and 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 and such activities are, therefore, evaluated in this section.

In addition to the County’s General Plan Noise Element, this analysis uses the Federal Interagency Committee on Noise guidance in evaluating project-related increases in ambient noise. The Federal Interagency Committee on Noise guidance is not a regulatory standard applicable to the project, but is used as a relevant significance criterion to assist in evaluating the magnitude of project-related noise increases. The Federal Interagency Committee on Noise guidance identifies increases of +5 dB where ambient levels are below 60 dB, +3 dB where ambient levels are between 60 and 65 dB, and +1.5 dB where ambient levels exceed 65 dB L_{dn} as potentially significant, particularly during evening and nighttime events when ambient levels are lower and community sensitivity is higher, which are consistent with the County General Plan Policy NO-9. For vibration, this analysis uses Caltrans guidance for structural damage potential and FTA guidance for human annoyance, as described under Impact 4.3-2.

ISSUES NOT DISCUSSED FURTHER

For a project within the vicinity of an airport or a private airstrip, expose people residing or working in the project area to excessive noise levels—The proposed project would not expose people to excessive noise levels from an airport or private airstrip because the project site is not located within two miles of any airports or airstrips. 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. Therefore, this issue is not discussed further in this EIR.

IMPACT ANALYSIS

Impact 4.3-1: 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?

Short-Term Project-Generated Construction Source Noise

Construction of the proposed stadium improvements would occur on the Rio Americano High School campus and include localized excavation and foundation work for new light standards and bleacher/press box components; augering of footing holes; trenching for electrical conduit serving the lighting system; backfilling and surface restoration of trench areas; delivery and erection of bleacher and press box materials; and limited paving, patching, or landscaping restoration where disturbed areas are not restored with landscaping.

The loudest construction activities are expected to occur during localized augering for light-standard footings, trenching for electrical conduit, limited excavation and backfilling, concrete placement, and delivery/assembly of bleacher and press box components. Construction equipment could include an auger or drill rig, excavator or

backhoe, trencher, skid steer or small loader, forklift or boom truck, concrete truck, generator, compressor, hand tools, and small compaction or paving equipment. Large-scale earthmoving equipment such as scrapers or motor graders is not anticipated to be used for extended periods, if at all, because disturbance would be limited to discrete improvement areas. For purposes of this conservative analysis, construction noise was modeled assuming the simultaneous operation of three pieces of construction equipment, resulting in a combined noise level of approximately 86 dBA L_{eq} at 50 feet from active construction areas. This 86 dBA L_{eq} value represents the conservative reference noise level at 50 feet and is not the predicted receptor noise level; modeled receptor noise levels shown in Table 4.3-13 account for distance attenuation from active construction areas to nearby residences. Table 4.3-13 summarizes modeled construction noise levels compared to existing ambient levels measured during the 2025 noise survey.

Table 4.3-13. Ambient and Project Construction Noise Levels at Closest Sensitive Receptors

Receiver	Distance (ft) From Acoustical Center Between Noise-Sensitive Receiver locations and Proposed Construction Areas	Exterior Noise Level, dBA L_{eq} Ambient Noise	Exterior Noise Level, dBA L_{eq} Project Noise	Interior Noise Level, dBA L_{eq} Project Noise, Doors/Windows Open	Interior Noise Level, dBA L_{eq} Project Noise, Doors/Windows Closed (EPA)
Residences to the east	150	51	77	62	52
Residences to the north	400	57	68	53	43

Notes: Construction noise levels are based on a conservative combined reference level of 86 dBA L_{eq} at 50 feet from active construction areas, assuming simultaneous operation of three pieces of construction equipment. Noise levels at receptors were calculated using a standard attenuation rate of 6 dBA per doubling of distance.

dBA = A-weighted decibels

EPA = U.S. Environmental Protection Agency

ft = feet

L_{eq} = Equivalent Noise Level

Sources: Modeled by AECOM 2025.

Active construction equipment use in the stadium area would occur approximately 150 feet or more west of the closest residences adjacent to the campus's eastern boundary. Construction activity associated with the pedestrian pathway extending toward American River Drive would occur approximately 400 feet or more from residences north of American River Drive. As shown in Table 4.3-13, daytime project construction noise levels at the nearest noise-sensitive receptors could reach approximately 77 dBA L_{eq} at the eastern residences and approximately 68 dBA L_{eq} at residences north of American River Drive, based on a conservative combined construction noise level of 86 dBA L_{eq} at 50 feet and a standard attenuation rate of 6 dBA per doubling of distance. These highest levels would be temporary and would occur only during the most intensive construction activities. Residences to the west are farther from the proposed construction activity and would experience lower construction noise levels. Measured daytime ambient levels in the vicinity of the project site ranged from 51 to 62 dBA L_{eq} , with maximum noise levels between 66 and 86 dBA (Table 4.3-1), and 51 dBA L_{eq} at residences east of the project site and 57 dBA L_{eq} at residences on the north side of American River Drive. Compared to these baseline conditions, construction activities could result in temporary noise increases of approximately 11 to 26 dBA L_{eq} above ambient at the nearest residences. This would only occur for a limited duration and would not change long-term ambient noise conditions around the project site. Nonetheless, for the purposes of this EIR, this potential increase in temporary and intermittent noise levels as a result of proposed project construction would not only be clearly perceptible, but would also represent a substantial temporary increase in ambient noise levels well above +5 dBA; this short-term construction-related impact is considered **potentially significant**.

Accordingly, potential construction-related noise impacts on nearby residential uses are considered potentially significant. Project construction could also result in disturbance of sensitive species near the project site. Potential impacts on biological resources as a result of construction noise are further discussed in Section 4.2, “Biological Resources.”

Long-Term Project-Generated Operational Noise

The proposed project would result in new long-term noise sources including mechanical equipment, increased parking lot activities, project area traffic, and increased crowd, bleacher, band, and public address system activities during some (estimated to be approximately 13 new) events at the existing Raider Stadium. As discussed in Chapter 3, “Project Description,” of this EIR, events may range from campuswide activities, to graduation, to athletic games and practices and other community events making use of the stadium. The track and field facility is currently used by the Rio Americano High School athletic program including football, flag football, lacrosse, soccer, and track & field. The track and field facility is also used occasionally for other school events such as assemblies and field days. The existing Raider Stadium includes limited seating (up to 288 people), a public address system, and portable diesel-powered lights, all of which support existing sports practices and games, primarily in the daytime hours and some limited evening events with use of the portable diesel-powered lights. The proposed project would not increase the scale of use of the stadium for existing on-site activities, but would allow for increased scheduling flexibility, including adjusting for high-heat days when practices during the cooler hours of the evening would be beneficial for athletes. Home varsity football games, which are currently hosted off-site at El Camino High School, would instead be hosted at Raider Stadium with implementation of the proposed project. As a result of the increased seating, the proposed project would also allow for the school to host improved whole-school assemblies during or immediately following school hours due to the proposed additional seating, graduation ceremonies (which are currently hosted off-campus), and other community events. Where there is no precise proposed schedule for such activities, the estimated occurrence of existing and future activities with implementation of the proposed project is provided in Table 3-1 of this EIR.

As the activity that would most likely draw the largest crowd and have the greatest increase in noise-generating sources such as traffic and the public address system, football games provide the conservative basis for the operational stadium event noise analysis. Home football games would be intermittent, occurring approximately five to eight times throughout the fall football season, while other future uses of the stadium could occur throughout the year. Nonetheless, noise from other activities, including whistles, player calls, practices, and smaller spectator events, would generally generate lower noise levels than football games because they would involve smaller crowds, less frequent public address system use, and limited or no band activity. Table 3-1 in “Project Description” of this EIR provides a summary of the existing and anticipated uses of the stadium with implementation of the proposed project. No uses of the stadium are proposed before sunrise.

Stadium Lighting

The stadium lighting itself would not generate noise. Under existing conditions, some nighttime events occur using temporary diesel-powered lighting equipment. Such equipment generates localized engine noise during use. The proposed project would eliminate the use of the existing diesel-powered light stands and related noise and replace with the proposed permanent lighting system, which would not be a noise-generating source, and there would be **no impact** directly related to the proposed lighting system.

However, by enabling extended use of the stadium into the evening and increasing the number and size of evening events hosted on campus, the lighting indirectly contributes to additional operational noise from crowds, amplified sound, traffic, and parking lot use, as evaluated above. The lighting itself is not a noise source, but its installation is the enabling factor for nighttime event noise impacts, as discussed further below.

Press Box Mechanical Equipment Noise

Operation of mechanical equipment associated with the new press box (e.g., small heating, ventilation, and cooling units or exhaust fans) could generate localized noise. Because the press box would be small, approximately 30 feet by 8 feet by 9 feet, any HVAC system would be expected to consist of a small unit, likely in the range of approximately 1 to 3 tons, rather than a large commercial HVAC system. Current manufacturer data for small split-system and mini-split outdoor units indicate typical outdoor sound pressure levels in the range of approximately 52 to 66 dBA, depending on unit size and model (Carrier 2022; Lennox 2022). To provide a conservative analysis, this EIR assumes a press box mechanical equipment noise level of 74 dBA at 3 feet, which is above the typical range for small split-system HVAC equipment and below the upper range associated with larger commercial equipment. Mechanical equipment would be attached to or integrated within the press box structure and, at the easternmost point of the proposed press box, would be approximately 335 feet from the nearest residential property line, based on the current project drawings. At this distance, a 74 dBA source level at 3 feet would attenuate to approximately 34 dBA before accounting for additional shielding from the press box structure, intervening site features, or equipment orientation. Given the limited size of the equipment, distance to the nearest residences, structural shielding, and the fact that measured ambient daytime noise levels in the area ranged from 51 to 62 dBA L_{eq} and the measured ambient nighttime noise level at nearby residences along Whitehall Way was 46 dBA L_{eq} , operation of press box mechanical equipment would not result in a substantial increase in ambient noise levels at the nearest residences. This impact would therefore be **less than significant**.

Parking Lot Activities

The proposed project would not add new parking facilities but would increase the use of existing parking lots during higher-attendance events. Noise associated with parking lot activity typically includes car door slams, engine starts, low-speed circulation, and people talking. Parking activity would occur during both arrival and departure periods; however, the post-event departure period would represent the highest-intensity condition because event attendees and vehicles would leave the campus over a shorter, more focused period of time compared to the typical more gradual arrival at the start of an event. For a conservative parking lot activity scenario, the analysis assumed a maximum-capacity event with approximately 391 vehicles accommodated in the northernmost parking lots that would be closest to residential receptors and a trip multiplier of 2, resulting in 782 parking-related vehicle movements during the analysis period. Based on this activity level, parking lot noise would be approximately 64 dBA L_{eq} at 50 feet from the acoustical center of the parking area. At the nearest representative residential receptor, approximately 350 feet from the center of the northernmost parking lots, noise would attenuate to approximately 47 dBA L_{eq} .

The predicted parking lot noise level of 47 dBA L_{eq} would be 1 dBA above the existing nighttime ambient noise measurements at the residences adjacent to the eastern project site perimeter, which is likely lower than that along American River Drive, within the range of measured daytime ambient noise levels surrounding the project site (51 to 62 dBA L_{eq}) and substantially below the measured daytime maximum noise levels (66 to 85 dBA L_{max}). Although post-event parking activity would occur during evening hours and would represent a shift in the timing of parking lot noise, the modeled level would not substantially exceed existing ambient conditions at the nearest

representative residential receptor. In addition, this condition would be limited to post-event departure periods for a small number of peak-capacity events, expected to occur approximately five to eight times per year, and would not represent a regular or continuous operational noise source. Given the intermittent and short-duration nature of parking lot noise, along with shielding from intervening structures and vegetation, parking lot activity associated with evening events would not substantially elevate noise levels at nearby residences. Therefore, parking lot activity would be **less than significant**.

Increase in Project Area Traffic

The proposed project would not increase school enrollment but would enable additional events – both nighttime events during times where sensitivity to noise is heightened and also daytime events that could be hosted on the campus due to the improvements, or where the attendance and participation in activities can be increased due to the proposed improvements (e.g., football games, graduation, all-school assemblies, practices, and community gatherings). Event trip generation, traffic distribution, and roadway volume assumptions are based on the Local Transportation Analysis prepared for the project by Kimley-Horn (Kimley-Horn 2026). These events would generate additional vehicle trips compared to existing conditions. However, traffic-related noise along surrounding roadways (e.g., American River Drive and Fair Oaks Boulevard) would increase only incrementally during event periods. According to Caltrans (2013), roadway traffic volumes must approximately double to result in a perceptible 3-dBA increase in community noise levels. The project-related traffic increase would not approach a doubling of volumes along local roadways (Kimley-Horn 2026). In addition, event-related traffic increases would be temporary, occurring only during pre- and post-event periods, and would not represent a substantial permanent change in community noise exposure.

Table 4.3-14 summarizes the modeled traffic noise levels for existing plus average project conditions for the general (more typical) attendance event scenario, such as a typical Friday night football, providing noise levels at 30, 50, 70, and 100 feet from the centerline of each major roadway in the immediate vicinity of the project site, and lists the distances from the roadway centerlines to the 65 dB L_{dn} traffic noise contour. These traffic noise modeling results are based on existing ADT volumes provided in the transportation analysis prepared to support this EIR (Kimley-Horn 2026). Table 4.3-15 summarizes the modeled existing plus average project traffic noise levels for the same representative roadway segments and noise contour distances, but for the existing peak-hour traffic volumes. Similarly, Table 4.3-16 and Table 4.3-17 show the same data, but for the peak-attendance event scenario, such as a peak-attendance Friday night football game or a graduation. The extent to which receptors in the vicinity of the project site are affected by existing traffic noise depends on their respective proximity to the roadways and their individual sensitivity to noise.

Relative to the existing traffic noise conditions, the existing plus average project traffic noise for average daily traffic, noise would increase by approximately 0.1 to 0.3 dB, which is well below the Sacramento County General Plan standard of a +1 dB increase. Under existing plus average project traffic noise for peak-hour volume, traffic noise would increase by approximately 0.2 to 1.7 dB. While this exceeds the +1 dB standard, it is for peak-hour conditions and not long-term ambient conditions, and would be less than the +3 dB noise increase to be typically audible.

Table 4.3-14. Summary of Modeled Levels of Existing plus Average Project Traffic Noise (Average Daily Traffic [ADT])

Roadway	From	To	Distance (feet) to L _{dn} 65 dB	Noise Level (L _{eq} [dB]) at 30 feet	Noise Level (L _{eq} [dB]) at 50 feet	Noise Level (L _{eq} [dB]) at 70 feet	Noise Level (L _{eq} [dB]) at 100 feet
American River Drive	Morris Way	Saverien Drive	81	69.3	67.1	65.6	64.1
American River Drive	Saverien Drive	Wixford Way	80	69.3	67.1	65.6	64.1
Saverien Drive	Fair Oaks Boulevard	American River Drive	69	68.6	66.4	65.0	63.4

Notes: dB = A-weighted decibels; L_{dn} = day-night average noise level; L_{eq} = an average of the sound energy occurring over a specified time period.

Source: Data modeled by AECOM in 2026

Table 4.3-15. Summary of Modeled Levels of Existing plus Average Project Traffic Noise (Peak-Hour Volume)

Roadway	From	To	Distance (feet) to L _{eq} 65 dB	Noise Level (L _{eq} [dB]) at 30 feet	Noise Level (L _{eq} [dB]) at 50 feet	Noise Level (L _{eq} [dB]) at 70 feet	Noise Level (L _{eq} [dB]) at 100 feet
American River Drive	Morris Way	Saverien Drive	107	70.5	68.3	66.9	65.3
American River Drive	Saverien Drive	Wixford Way	140	71.7	69.5	68.0	66.5
Saverien Drive	Fair Oaks Boulevard	American River Drive	174	72.6	70.4	69.0	67.4

Notes: dB = A-weighted decibels; L_{dn} = day-night average noise level; L_{eq} = an average of the sound energy occurring over a specified time period.

Source: Data modeled by AECOM in 2026

Table 4.3-16. Summary of Modeled Levels of Existing plus Peak-Attendance Project Traffic Noise (Average Daily Traffic [ADT])

Roadway	From	To	Distance (feet) to L _{dn} 65 dB	Noise Level (L _{eq} [dB]) at 30 feet	Noise Level (L _{eq} [dB]) at 50 feet	Noise Level (L _{eq} [dB]) at 70 feet	Noise Level (L _{eq} [dB]) at 100 feet
American River Drive	Morris Way	Saverien Drive	84	69.5	67.2	65.8	64.2
American River Drive	Saverien Drive	Wixford Way	82	69.4	67.1	65.7	64.1
Saverien Drive	Fair Oaks Boulevard	American River Drive	75	69.0	66.8	65.3	63.8

Notes: dB = A-weighted decibels; L_{dn} = day-night average noise level; L_{eq} = an average of the sound energy occurring over a specified time period.

Source: Data modeled by AECOM in 2026

Table 4.3-17. Summary of Modeled Levels of Existing plus Peak-Attendance Project Traffic Noise (Peak-Hour Volume)

Roadway	From	To	Distance (feet) to L _{eq} 65 dB	Noise Level (L _{eq} [dB]) at 30 feet	Noise Level (L _{eq} [dB]) at 50 feet	Noise Level (L _{eq} [dB]) at 70 feet	Noise Level (L _{eq} [dB]) at 100 feet
American River Drive	Morris Way	Saverien Drive	112	70.7	68.5	67.1	65.5
American River Drive	Saverien Drive	Wixford Way	161	72.3	70.1	68.6	67.1
Saverien Drive	Fair Oaks Boulevard	American River Drive	234	73.9	71.7	70.2	68.7

Notes: dB = A-weighted decibels; L_{dn} = day-night average noise level; L_{eq} = an average of the sound energy occurring over a specified time period.

Source: Data modeled by AECOM in 2026

Relative to the existing traffic noise conditions, the existing plus peak-attendance project traffic noise for average daily traffic, noise would increase by approximately 0.3 to 0.7 dB, which is below the Sacramento County General Plan standard of a +1 dB increase. Under existing plus peak-attendance project traffic noise for peak-hour volume, traffic noise would increase by approximately 0.4 to 2 dB. While this exceeds the +1 dB standard, it is for peak-hour conditions and not long-term ambient conditions, and would be less than the +3 dB noise increase to be typically audible.

Therefore, the project would not cause a substantial permanent increase in off-site traffic noise levels, and the incremental traffic associated with new nighttime events would represent a **less-than-significant impact**.

Crowd, Bleacher, Band, and Public Address System Noise

As noted above, the existing track and field includes limited seating (up to 288 people), a public address system, and portable diesel-powered lights, all of which support existing sports practices and games during the daytime and evening/nighttime hours. As described above, the proposed project would provide for an increase in the frequency and capacity of some events that could be hosted on the campus due to the proposed improvements (e.g., varsity football games, graduation, all-school assemblies, and school-sanctioned community events). Crowd noise (cheering, yelling, whistles, musical instruments, movement on bleachers and ramps, and use of the public address system and amplified sound) can be a dominant source during such events. These sources would occur together during events and would collectively contribute to off-site noise exposure.

The largest individual event with the greatest likely number of noise sources (i.e., crowd, bleacher, band, and public address system) not already accommodated by the existing Raider Stadium facilities would be a peak-attendance home football game. Football games are used as the representative worst-case event because they are expected to generate the largest attendance, greatest public address system use, and highest levels of cheering, band activity, bleacher movement, and other spectator-generated noise. Events such as graduation, all-school assemblies, and school-sanctioned community events could also be hosted with implementation of the proposed project due to the provision of additional seating; however, such events are less likely to include the variety and intensity of noise sources that are present during a football game. Other events, such as soccer games, track events, practices, and school assemblies are already occurring at the project site and, while they would also generate crowd and activity noise, this activity is part of the existing baseline conditions and include daytime and evening noise due to the use of portable diesel-powered lights. Representative ambient and maximum noise conditions during a soccer game that took place in February 2026 and would continue to occur in the future are

presented in Table 4.3-2. Even if these events were to shift in timing as a result of the proposed project, these events generally would be expected to have comparatively smaller crowds, shorter periods of concentrated cheering, limited or no band activity, and less frequent use of amplified sound compared to football games, as summarized in Table 3-1 of the “Project Description.” Therefore, football games provide the conservative basis for evaluating operational stadium event noise, while noise from other events would be expected to be equal to or less than the football-game condition evaluated below.

Reference measurements from an evening football game at El Camino High School (August 29, 2025) were used to characterize stadium event conditions. The El Camino measurements included locations near residential property lines, along the field edges, behind the bleachers, and near the announcer cabin and speaker system. Site-specific acoustics differ between El Camino High School and Rio Americano High School, including field orientation, distance to residences, bleacher and speaker locations, intervening barriers or buildings, and directionality of crowd and PA system sound. Because several of the El Camino measurement locations were located close to the crowd, bleachers, and PA system, those measurements represent near-source or high-exposure conditions and provide a conservative basis for characterizing potential stadium-event noise at Raider Stadium with implementation of the proposed project. The reference data are used to characterize the magnitude of stadium-event noise sources, while project site-specific receptor distances and ambient measurements are used to evaluate project-specific impacts.

Reference measurements conducted during a football game at El Camino High School, in which attendance was approximately 3,400 and was the highest attended game compared to other games of the 2024 and 2025 seasons, documented average noise levels of 64.7 dBA L_{eq} behind the eastern bleachers along the fence line of residential properties, approximately 50 feet from the nearest crowd seating area and approximately 50 feet from the public address/announcer area, and 66.3 dBA L_{eq} at the northeastern corner of the field near residences approximately 50 feet from the nearest crowd seating area and approximately 50 feet from the public address/announcer area. The measurements also documented average noise levels of 74.8 dBA L_{eq} behind the western bleachers near the announcer cabin and speaker system and 77.7 dBA L_{eq} along the northern edge of the field, both approximately 50 feet from the nearest crowd seating area and/or public address/announcer area. These locations represent higher-exposure conditions closer to the primary crowd and amplified sound sources. Maximum noise levels ranged from 78.7 to 92.7 dBA L_{max} . The highest maximum level, 92.7 dBA L_{max} , was measured behind the western bleachers near the announcer cabin and speaker system; other maximum levels were 87.9 dBA L_{max} behind the eastern bleachers near the residential fence line, 78.7 dBA L_{max} at the northeastern corner of the field, 89.7 dBA L_{max} along the northern edge of the field, and 80.3 dBA L_{max} along the southern edge of the field.

By comparison, ambient daytime noise levels at and surrounding Rio Americano High School ranged from 51 to 62 dBA L_{eq} , with nighttime levels at approximately 46 dBA L_{eq} . The El Camino High School reference measurements used in this analysis were collected approximately 50 feet from the primary stadium event noise source areas, including the crowd seating areas and public address/announcer area. At Rio Americano High School, the nearest residences are located adjacent to the eastern boundary of the campus and across American River Drive to the north. For operational stadium event noise, the relevant distance is the distance from the residences to the proposed bleachers, crowd seating areas, and public address speaker locations, rather than the distance to the edge of the track. Based on the current site plan, the nearest eastern residence would be approximately 350 feet from the center, or acoustical center, of the proposed bleacher/crowd seating area and potential centrally located public address speaker source area. While portions of the bleachers would extend closer to the eastern property line than this center-point distance, the 350-foot distance is used as a representative

distance to the primary combined crowd/bleacher/public address source area, not as the minimum distance to every portion of the bleachers. Other residential locations would be at a greater distance from the noise sources and experience increased attenuation, resulting in reduced noise exposure compared to this nearest residence. If speakers are mounted to the bleachers they could be closer to the eastern property line than if centrally located at the press box; however, this configuration would use multiple smaller speakers with controlled dispersion patterns and lower individual output levels rather than fewer, higher-output centrally mounted speakers. Speakers located on or near the eastern bleachers would be directed toward the seating areas and away from the eastern property line and residences, while speakers located farther west would be directed toward the field and seating areas. Using a standard point-source attenuation rate of 6 dBA per doubling of distance for direct sound propagation, the El Camino reference football game noise levels of 65 to 78 dBA L_{eq} at approximately 50 feet from the crowd/public address source area would decrease by approximately 17 dBA at 350 feet. Although stadium event noise includes multiple sources distributed across the bleachers and field area, this attenuation rate provides a reasonable screening-level estimate for combined crowd and public address system noise at the nearest residential receptors. Therefore, predicted stadium event noise levels at the nearest eastern residences would be approximately 48 to 61 dBA L_{eq} before accounting for additional shielding, speaker directionality, and attenuation related to surrounding fences and vegetation. Compared to the measured nighttime ambient level of approximately 46 dBA L_{eq} at the nearest residences east of the project site, predicted stadium event noise could result in an increase of approximately 2 to 15 dBA L_{eq} at the nearest eastern residences during high-attendance nighttime events. This increase would be clearly perceptible and could be disruptive during sensitive evening hours, particularly during the loudest portions of football games.

Maximum reference football game noise levels of 79 to 93 dBA L_{max} at 50 feet would attenuate to approximately 62 to 76 dBA L_{max} at 350 feet. These maximum levels would occur intermittently during louder crowd, PA, or band activity, but would result in increased potential for event noise to be audible and potentially disruptive at nearby residences during evening events. Because stadium event noise is generated by multiple sources distributed across the seating and field areas, actual attenuation could vary from this screening estimate. Nonetheless, stadium event noise could result in substantial temporary increases at nearby residential receptors. This impact would therefore be considered **potentially significant**.

Mitigation Measure 4.3-1a: Implement Measures to Reduce Short-Term, Construction-Related Noise.

- Provide written notification to residences east and northeast of Rio Americano High School and north across American River Drive that are within 500 feet of active construction areas, at least three weeks prior to the start of construction. The notification shall identify the type, duration, and frequency of construction activities and provide a mechanism for residents to contact the District regarding construction noise. Contact information shall also be posted in conspicuous locations adjacent to the site. The notification shall include anticipated dates and hours of construction and a daytime telephone number for the designated project representative. Recommendations to assist nearby residents in reducing interior noise levels (e.g., closing windows and doors) shall also be included.
- Prohibit the use of materials and equipment deliveries and the start-up or operation of construction equipment before 7:00 a.m. and after 7:00 p.m., Monday through Saturday and before 9:00 a.m. and past 5:00 p.m. on Sunday.
- Restrict the use of bells, whistles, alarms, and horns to safety-warning purposes.

- Locate stationary equipment (e.g., compressors and generators), construction staging areas, and stockpiling areas at least 150 feet from the eastern project site boundary, the American River Parkway, and American River Drive.

Mitigation Measure 4.3-1b: Implement Stadium Event Noise Controls.

The District shall implement stadium event noise controls to reduce off-site noise exposure from crowd activity, bleacher activity, band activity, artificial noisemakers, and public address/amplified sound. The noise control measures shall include the following requirements:

Public Address System Design and Operation

- The public address system shall be designed as a distributed speaker system using multiple, smaller speakers located closer to the intended audience areas, such as on or near the bleachers, press box, or snack bar/concession area, rather than relying on high-mounted speakers.
- Speakers shall be aimed downward and toward the seating and field areas, and shall be oriented away from nearby residential properties.
- Speakers shall use controlled dispersion patterns to focus sound within the stadium seating and field areas and minimize spillover toward adjacent residences.
- The public address system shall include zone controls that allow speakers or speaker groups not needed for a particular event, such as visitor-side speakers or ancillary speakers, to be turned off.
- The public address system settings shall be established at the minimum levels required for intelligibility over background crowd noise.
- The public address system shall include digital signal processing or equivalent volume-limiting controls to establish a maximum output level that cannot be exceeded by event staff.

PA System Testing and Performance Standard

- Prior to operation of the permanent public address system for evening events, the District shall conduct a sound check and property-line noise measurement to verify that public address system settings minimize off-site sound exposure. The sound check shall be conducted during daytime hours and shall include measurements at the eastern property boundary adjacent to residences and at a representative receptor north of the stadium across American River Drive.
- The public address system shall be adjusted, and additional controls shall be installed, if necessary, to achieve a maximum PA system noise level of 70 dBA L_{max} at the nearest residential property line. An alternative performance level may be used only if it is supported by final public address system design, speaker layout, receptor distances, and field verification, and only if it is demonstrated to be equally or more protective of nearby residential receptors.
- The approved public address settings shall be documented and maintained for evening events. The District shall prohibit event staff from increasing public address volume above the approved settings.

Event Scheduling and Use Restrictions

- Evening events shall be scheduled to conclude by no later than 10:00 p.m., recognizing that certain events, such as football games, may occasionally extend beyond 10:00 p.m. due to overtime or other circumstances outside the District's control.
- If an event extends beyond 10:00 p.m., use of the public address system, amplified music, and band activity shall cease after 10:00 p.m., except for brief safety- or emergency-related announcements.
- Public address system sound checks and speaker testing shall be limited to daytime hours.
- Where public address system use is not necessary for a particular event or activity, use of the public address system shall be prohibited.

Artificial Noisemakers and Spectator Controls

- Artificial noisemakers, including air horns, bullhorns, cowbells, megaphones, amplified cheering devices, and similar items, shall be prohibited at evening stadium events. The District shall provide notice of this restriction in event materials and signage. Bags may be subject to inspection consistent with District policy, and attendees shall not be permitted to use prohibited noisemakers.
- The District shall post signage and provide event announcements requesting that attendees depart quietly and respect nearby residential neighborhoods.

Bleacher and Ramp Noise Controls

- The bleacher design shall include noise-reducing design features for ramps, platforms, or other walking surfaces that could generate elevated footfall or vibration-related noise. Such features may include anti-slip resilient coating, sound-deadening treatment on the underside of ramps, or absorptive or shielding material along bleacher sides, provided that these features do not interfere with safety, drainage, accessibility, maintenance, or spectator sightlines.
- Noise-reducing treatments shall not be required on bleacher step surfaces where the District determines that such treatments would be infeasible due to durability, weather exposure, maintenance, or safety concerns.

Significance after Mitigation

Construction

Implementation of Mitigation Measure 4.3-1a would reduce the intensity of construction-related noise through avoidance of nighttime/evening hours, use of properly maintained equipment with noise-reduction devices, notification of nearby residents, location of fixed equipment and staging areas at least 150 feet from residential outdoor use areas where feasible, and establishment of a real-time complaint response mechanism. These measures would minimize noise exposure to the extent feasible. Based on a conservative reference level of 86 dBA L_{eq} at 50 feet, locating stationary equipment approximately 150 feet from residences would reduce construction noise to approximately 77 dBA L_{eq} before accounting for additional shielding or equipment controls. However, even at this reduced level, construction noise would remain approximately 15 to 25 dBA above

measured daytime ambient levels of 51 to 62 dBA L_{eq} . Therefore, although the highest noise-generating activities during construction would be temporary and limited in duration, residual construction noise impacts would remain **significant and unavoidable**.

Operations

Implementation of Mitigation Measure 4.3-1b would reduce stadium event noise by requiring a distributed, lower-height, downward-oriented public address system; volume limiters; zone controls; property-line sound checks; restrictions on artificial noisemakers; limits on public address system, amplified music, and band activity after 10:00 P.M.; bleacher/ramp noise controls; and a complaint response and corrective-action process. These measures would reduce off-site stadium event noise. However, because residences are located close to the stadium, and because crowd noise, bleacher activity, and certain event-related sound sources cannot be fully controlled through feasible mitigation, stadium event noise may continue to result in substantial temporary increases above ambient evening conditions. Therefore, even with implementation of Mitigation Measure 4.3-1b, stadium event noise impacts during intermittent high-capacity events would remain **significant and unavoidable**.

Impact 4.3-2: Generation of excessive groundborne vibration or groundborne noise levels?

Construction activities associated with the proposed project 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. Although large-scale earthmoving equipment is not anticipated to be used for extended periods, if at all, the vibration analysis conservatively evaluates a large dozer as the representative construction equipment with the highest potential vibration level. According to the Federal Transit Administration (FTA 2018), vibration levels from a large dozer are approximately 0.089 inches per second (in/sec) PPV and 87 VdB at 25 feet. Table 4.3-18 summarizes modeled construction vibration levels at noise sensitive locations.

Table 4.3-18. Project Construction Vibration Levels at Closest Sensitive Receptors

Receiver	Location	Shortest Distance (ft) Between Noise-Sensitive Uses and Proposed Construction Areas	Vibration PPV	Levels 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**.

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4.4 TRANSPORTATION AND CIRCULATION

4.4.1 ENVIRONMENTAL SETTING

The proposed project would be located at the existing Raider Stadium on the Rio Americano High School campus at 4540 American River Drive in the Arden-Arcade community of unincorporated Sacramento County. The high school generates vehicle trips associated with daily attendance by students, faculty, staff, and visitors, as well as athletic competitions and other school events that attract members of the surrounding community.

Athletic practices and competitions involving football, flag football, lacrosse, soccer, and track and field currently occur at Raider Stadium on the Rio Americano High School campus. These existing activities occur on approximately 40 days during the school year, primarily from late August through April, and generally attract approximately 50 to 120 attendees. Because Raider Stadium does not currently have permanent sports lighting or sufficient seating for larger events, varsity home football games are currently hosted off site at El Camino High School, which is located approximately three miles north of the Rio Americano campus. Similarly, the existing Raider Stadium on the Rio Americano High School campus does not currently have seating to support graduation or whole-school assemblies outside.

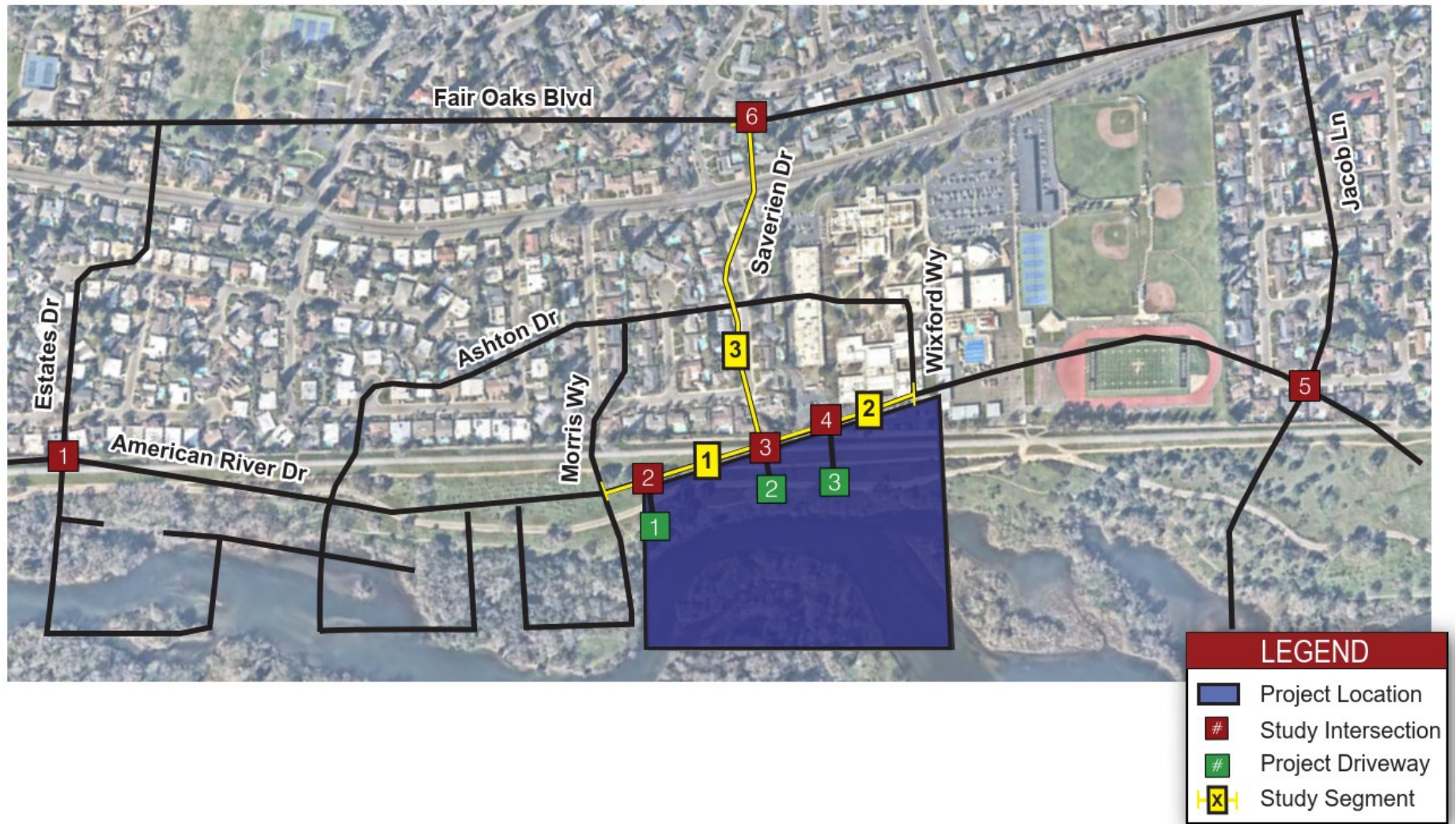
Under the proposed project, permanent lighting and expanded bleacher seating would allow varsity home football games to occur at Raider Stadium on Friday evenings, and Rio Americano High Schools could also accommodate graduation and additional campus-wide and school-sanctioned community events. While other existing field use may shift in timing due to improved nighttime lighting, these events are already occurring with the use of diesel-powered portable lights and would not be anticipated to increase in frequency or attendance compared to existing conditions.

Football games are the activity that would produce the largest number of trips to and from the school for stadium events. Attendance at Rio Americano home football games held at El Camino High School ranged from approximately 1,000 to 3,400 attendees during the 2024 and 2025 seasons. The highest attendance of approximately 3,400 people occurred during a Rio Americano versus Jesuit game, while attendance at the other reviewed games averaged approximately 1,400 attendees, as discussed in the Vehicle Miles Traveled (VMT) Analysis (Appendix E). The District anticipates approximately five home football games per season, with up to eight games possible depending on the league schedule and postseason play. The proposed bleachers would accommodate up to approximately 2,575 people.

PROJECT STUDY AREA

In 2026, Kimley-Horn prepared a *Local Transportation Analysis (LTA)* (Appendix F) to evaluate localized transportation conditions associated with implementation of the proposed project. The LTA evaluates project-related traffic volumes and vehicle queuing, parking supply and demand, event access and circulation, and bicycle and pedestrian safety. The LTA and VMT Analysis provide the technical basis for the transportation analysis presented in this section.

Roadways within the project study area are shown on Exhibit 4.4-1 and include:



Source: Kimley Horn 2026a

Exhibit 4.4-1 Project Location and Study Area

- **American River Drive:** Within the project study area, American River Drive is classified as a two-lane residential collector with frontage. In the vicinity of the project site, the roadway has one travel lane in each direction, a center two-way left-turn lane, and a posted speed limit of 35 miles per hour. Class II bicycle lanes are present in both directions, and sidewalks provide pedestrian access to the Rio Americano High School campus.
- **Saverien Drive:** Saverien Drive is a two-lane residential collector with frontage between Fair Oaks Boulevard and American River Drive. At American River Drive, Saverien Drive intersects Project Driveway 2, which provides access to the school campus. Class II bicycle lanes and sidewalks are present along Saverien Drive in the immediate vicinity of Rio Americano High School.
- **Fair Oaks Boulevard:** Fair Oaks Boulevard is an east-west roadway located north of the Rio Americano High School campus and intersects Saverien Drive at a signalized intersection. In the vicinity of the project site, Fair Oaks Boulevard is a four-lane road with center turning lanes and Class II bicycle lanes. Saverien Drive extends south from Fair Oaks Boulevard to American River Drive and provides a connection to the school campus.

The following six intersections were included in the project study area and are shown on Exhibit 4.4-1:

1. American River Drive at Estates Drive
2. American River Drive at Project Driveway 1
3. American River Drive at Saverien Drive/Project Driveway 2
4. American River Drive at Project Driveway 3
5. American River Drive at Jacob Lane
6. Fair Oaks Boulevard at Saverien Drive

Three existing intersections along American River Drive provide direct access to the Rio Americano High School campus and its parking areas, including American River Drive at Project Driveway 1; American River Drive at Saverien Drive/Project Driveway 2, which serves as the main campus entrance; and American River Drive at Project Driveway 3.

EXISTING OPERATING CONDITIONS

Bicycle and Pedestrian Safety

Bicycle routes and paths are typical examples of bicycle transportation facilities in the project area. Bicycle facilities are defined by the following classes¹:

- ▶ Class I – Provides a completely separated facility designed for the exclusive use of bicyclists and pedestrians with crossing points minimized.
- ▶ Class II – Provides a restricted right-of-way designated lane for the exclusive or semi-exclusive use of bicycles with through travel by motor vehicles or pedestrians prohibited, but with vehicle parking and cross-flows by pedestrians and motorists permitted.

¹ As detailed in Chapter 1000 of the California Department of Transportation's (Caltrans) Highway Design Manual. 2018

- ▶ Class III – Provides a right-of-way designated by signs or permanent markings and shared with pedestrians and motorists.
- ▶ Class IV – Provides a separated bikeway, often at street level, for the exclusive use of bicycles.

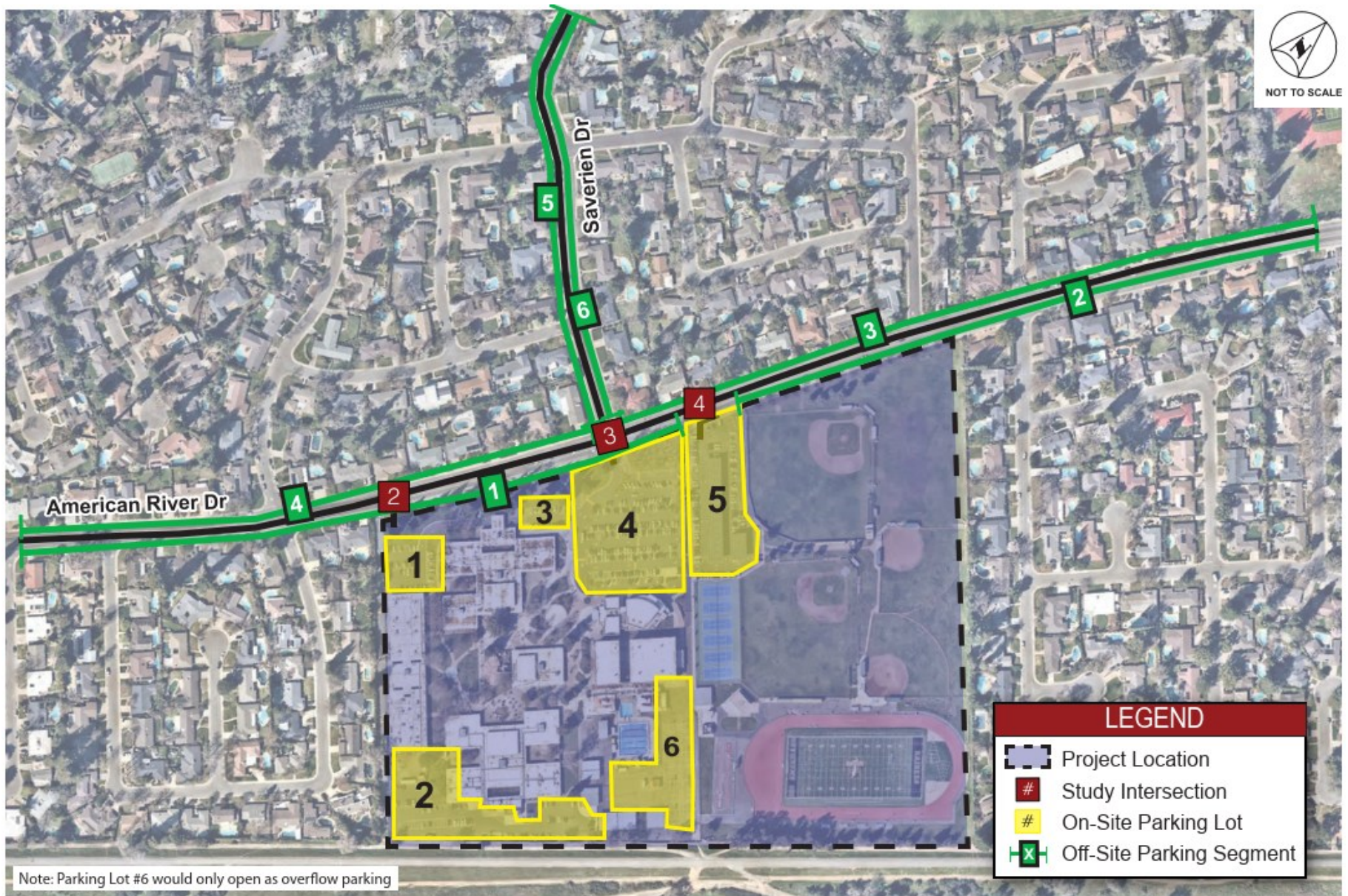
Class II bicycle lanes are present in both directions along American River Drive and Saverien Drive in the immediate vicinity of Rio Americano High School. Sidewalks along both roadways provide direct pedestrian access to the campus. The Jedediah Smith Memorial Trail multi-use path south of the campus also provides a dedicated off-street route for pedestrians and bicyclists.

The LTA includes an assessment of the roadway segment on Saverien Drive between Fair Oaks Boulevard and American River Drive to determine whether pedestrian safety improvements should be considered because of potential off-site parking that would result in event-specific temporary increases in vehicular egress along American River Drive and Saverien Drive, as well as pedestrian crossing on American River Drive. The following observations were made:

- ▶ More than 700 feet of sight distance is available for vehicles turning left into the campus from the westbound approach. This exceeds the Caltrans Highway Design Manual minimum stopping sight distance standard of 250 feet for a 35-mph roadway, and no sight-distance deficiencies exist.
- ▶ For attendees parking on the opposite side of American River Drive or along Saverien Drive, approximately 500 feet of sight distance is available looking to the right and approximately 400 feet is available looking to the left. Both distances exceed the Caltrans corner sight distance standard of 305 feet for a 35-mph corridor, ensuring safe vehicle egress.
- ▶ The closest identified pedestrian crossing is at the intersection of American River Drive and Saverien Drive, which is an all-way stop-controlled intersection. Unobstructed stopping sight distance is available on all approaches, allowing approaching motorists to clearly see the traffic control devices and pedestrians within the crosswalk, with no visual geometric deficiencies identified.
- ▶ No midblock pedestrian crossing facilities are present in the vicinity of the project site.

Parking

Existing parking on the Rio Americano High School campus is shown on Exhibit 4.4-2. The proposed project does not include the construction of additional parking. Rio Americano High School has 562 existing parking stalls, of which 537 were assumed to be available for general event parking during a Friday evening football game. The remaining 25 stalls are designated for electric-vehicle charging or accessible parking. Parking Lot 6, an on-campus overflow area occupying the blacktop and outdoor basketball courts, could accommodate an estimated 135 vehicles during highly attended games. During evening stadium events, the general event parking spaces and overflow area would be available to event attendees. The general and overflow parking areas would provide for a total of approximately 672 on-site event parking spaces not including electric vehicle (EV)-designated spaces and 697 including these spaces (Kimley-Horn 2026a).



Source: Kimley Horn 2026a

Exhibit 4.4-2 Project Location and Study Area

Additional on-street parking is available along portions of American River Drive, Saverien Drive, and nearby residential streets. Parking along American River Drive is prohibited between 8:00 A.M. and 4:00 P.M. but is available after 4:00 P.M., when Friday evening football games would occur. No parking restrictions were identified along Saverien Drive (Kimley-Horn 2026a). On-street parking along American River Drive between Morris Way and Piccadilly Circle and along Saverien Drive between American River Drive and Ashton Drive was estimated to be approximately 327 spaces (Kimley-Horn 2026a). Additional spaces are available along other nearby public streets in the vicinity of the campus.

To determine the average vehicle occupancy for vehicles driving to football games, traffic counts were conducted at El Camino Fundamental High School during the Rio Americano versus Jesuit game (Kimley-Horn 2026a). The observed average vehicle occupancy was 2.36 persons per vehicle for this Friday evening football game. Reality may reflect a higher vehicle occupancy, as other studies reviewed such as for Valley High Sports Complex in Santa Ana Unified School District, St. Vincent Sports Complex at St. Ambrose University, and Carmel High School Stadium in Carmel, California, observed average vehicle occupancy of 5.0, 4.0, and 3.24 persons per vehicle, respectively (Kimley-Horn 2023). Nonetheless, the occupancy as observed at the Rio Americano High School game is used for the purposes of this evaluation.

Existing VMT Conditions

Under existing conditions, varsity home football games are held at El Camino High School. The traffic count data collected at El Camino High School for a Rio Americano High School versus Jesuit football game attracted approximately 1,397 vehicle trips. A weighted average trip distance from the home block groups was used to estimate the average trip length to El Camino High School. The average visiting school trip distance was estimated for Rio Americano High School's league opponents. Using a conservative approach, the visiting school with the largest increase in trip distance that would be caused by the relocation of games from El Camino High School to Rio Americano High School with implementation of the proposed project was used for the visiting school VMT calculation. Based on this, football games held at El Camino High School were estimated to produce 19,077 total VMT per game, as discussed in the VMT Analysis (Appendix E).

4.4.2 REGULATORY FRAMEWORK

FEDERAL

Americans with Disabilities Act

Title II of the Americans with Disabilities Act (ADA) applies to state and local government entities, including public school districts, and requires that people with disabilities have equal access to public programs, services, and activities. Public entities must ensure that newly constructed or altered facilities, including pedestrian routes and other transportation-related facilities, are accessible in accordance with applicable ADA requirements.

The U.S. Department of Transportation enforces regulations governing transit, which includes ensuring that recipients of federal aid and state and local entities responsible for roadways and pedestrian facilities do not discriminate on the basis of disability in highway transportation programs or activities. The department also issues guidance with transit agencies on how to comply with the ADA to ensure that public transit vehicles and facilities are accessible.

STATE

Senate Bill 743 and CEQA Guidelines Section 15064.3

On September 27, 2013, SB 743 was signed into law, supporting previous climate-focused and transportation legislation, including the Sustainable Communities and Climate Protection Act of 2008 (SB 375), the California Global Warming Solutions Act of 2006 (AB 32), as well as the Complete Streets Act (AB 1358), which requires local governments to plan for a balanced, multimodal transportation network that meets the needs of all users. In December 2018, the OPR issued a final advisory to guide lead agencies in implementing SB 743, Technical Advisory on Evaluating Transportation Impacts in CEQA (OPR 2018).

The Technical Advisory observes that VMT is the most appropriate metric to use in evaluating a project's transportation impact under CEQA. VMT for residential and office projects is generally assessed using efficiency metrics, i.e., on a "per rate" basis. Specifically, the OPR-recommended metrics are VMT per capita for residential projects and VMT per employee for office projects. The Technical Advisory does not recommend a threshold approach for school projects. As with the proposed project, the Technical Advisory suggests that, for projects that do not involve new development or new uses, it is appropriate to evaluate the net overall change in VMT and "if the replacement leads to a net overall decrease in VMT, the project would lead to a less-than-significant transportation impact" (OPR 2018, page 17).

Lead agencies have the discretion to set or apply their own significance thresholds in lieu of those recommended in the Technical Advisory, provided they are based on substantial evidence. Lead agencies may continue to evaluate the social inconvenience of traffic congestion through such measures as level of service (LOS); however, under current state statutory and regulatory guidance, a project's contribution to traffic congestion alone is not considered an environmental impact under CEQA.

LOCAL

Sacramento County Transportation Analysis Guidelines

While the proposed project is not subject to County guidelines, the District has not adopted its own VMT implementation guidelines or threshold of significance. Accordingly, the project-specific VMT analysis used the Sacramento County Transportation Analysis Guidelines as technical guidance. Consistent with those guidelines, the proposed project was evaluated as a regional public facility, for which a net increase in regional VMT compared with existing no-project conditions would constitute a significant impact. As the CEQA lead agency, the District retains responsibility for determining the significance of the project's transportation impacts (Sacramento County Department of Transportation 2025).

4.4.3 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

METHODOLOGY

In support of the EIR, Kimley-Horn prepared an LTA to evaluate localized transportation conditions associated with implementation of the proposed project (Kimley-Horn 2026a). The LTA evaluates project-related traffic volumes and vehicle queuing, parking supply and demand, event access and circulation, and bicycle and pedestrian safety.

Kimley-Horn also prepared a VMT Analysis to compare the vehicle trips and local and regional VMT associated with varsity home football games under existing and project conditions (Kimley-Horn 2026b). The results of both studies inform the following evaluation of potential transportation impacts.

THRESHOLDS OF SIGNIFICANCE

Based on Appendix G of the State CEQA Guidelines, the proposed project would have a significant impact related to transportation if it would:

- ▶ Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities;
- ▶ Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b);
- ▶ Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment); or
- ▶ Result in inadequate emergency access.

IMPACT ANALYSIS

Impact 4.4-1: Conflict with a program plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Construction

The minor level of anticipated construction-related vehicle and equipment trips is consistent with the very limited amount of construction required for the proposed project, which would include installation of new light standards, removal of existing bleachers and installation of new and expanded bleacher seating, and new lighting along a pedestrian pathway. Construction of the proposed project would generate temporary vehicle trips associated with construction workers, material deliveries, equipment, and hauling activities. Construction access would be provided through the main campus entrance at American River Drive and Saverien Drive and along the existing paved fire access lane west of the track and field facility. Equipment and materials would be staged adjacent to Raider Stadium within school property.

Construction would occur between 7:00 A.M. and 4:00 P.M. on weekdays and would primarily occur during the summer, when classes are not in session and typical school-related trips to and from the campus would be minimal. Construction-related vehicle trips are estimated to be up to 20 round trips per day for construction worker passenger vehicles for up to 12 weeks, four haul-truck roundtrips during the initial structure removal phase, and up to four vendor and haul-truck trips per day during the remainder of the construction phase; these trips would be less during some periods, would be temporary, and would cease upon completion of the proposed improvements.

The proposed project does not include the permanent removal or alteration of a public roadway, transit facility, bicycle lane, sidewalk, or multiuse path. The effect on daily and peak-hour traffic volumes would be limited to the temporary 12-week construction period. The additional vehicles would not substantially alter existing roadway

capacity. Therefore, construction would not conflict with an applicable program, plan, ordinance, or policy addressing the circulation system. The construction impact would be **less than significant**.

Operation

While not directly applicable to the proposed project, the transportation-related goals and policies in the County General Plan and the Transportation Analysis seek to encourage alternative forms of mobility, increase walking and cycling, and make pedestrian safety a priority. The proposed project would continue to accommodate existing athletic practices and competitions at the existing Raider Stadium, and would allow some of these activities to be scheduled later in the evening. The proposed improvements would also allow varsity home football games that are currently held off-site to take place at Raider Stadium, as well as other potential school and school-sanctioned community events. Operation of the proposed project would use the existing surrounding roadway network and campus driveways. The proposed project does not include the permanent removal or alteration of a public roadway, transit facility, bicycle lane, sidewalk, or multiuse path. American River Drive and Saverien Drive have existing Class II bicycle lanes and sidewalks in the vicinity of Rio Americano High School, and the Jedediah Smith Memorial Trail multi-use path south of the campus provide an existing route for pedestrians and bicyclists. The proposed project would not affect the existing local bicycle and pedestrian infrastructure (Kimley-Horn 2026a). Although vehicle traffic is expected to increase in the area on approximately five to eight nights per year, when home football games are played, this increase would not result in substantial changes to the functionality of the roadway network.

Operation of the proposed project would not conflict with an identified applicable program, plan, or ordinance, or policy addressing the circulation system. Potential physical hazards associated with event parking, pedestrian and bicycle activity, vehicle circulation, and queuing are evaluated separately under Impact 4.4-3. The operational impact would be **less than significant**.

Impact 4.4-2: Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?

Construction

VMT analysis is intended to capture the long-term impacts of a proposed project. Thus, construction activities are not typically subject to VMT analysis. Construction of the proposed project would generate temporary vehicle trips associated with approximately 20 construction workers, equipment, material deliveries, and hauling activities. Construction would occur over approximately three to four months during the summer, when classes are not in session. Construction access would be provided from the main campus entrance at American River Drive and Saverien Drive, and equipment and materials would be staged within the school campus. These temporary construction trips would cease upon completion of the proposed improvements and would not result in a long-term change in regional travel patterns or vehicle miles traveled. Therefore, construction would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). The construction impact would be **less than significant**.

Operation

The proposed improvements would continue to accommodate existing activities at the existing Raider Stadium, allowing some activities to occur later in the evening than under existing conditions. The proposed improvements would also accommodate varsity home football games that are currently hosted off-site and other potential schoolwide and school-sanctioned community events.

Athletic practices and competitions involving football, flag football, lacrosse, soccer, and track and field already occur at Raider Stadium. These existing on-campus activities generally attract approximately 50 to 120 attendees. Although the proposed lighting may result in a shifting of schedules for some of these activities to occur later in the evening, the improvements are not anticipated to substantially increase attendance at these existing activities. Because these activities would continue to occur at the same location, they would not result in a substantial change in trip lengths or regional VMT.

Rio Americano High School's varsity home football games are currently hosted off-site at El Camino High School, approximately 3 miles north of the Rio Americano High School campus. With implementation of the proposed project, these existing games would instead occur at the Rio Americano High School Raider Stadium. The District anticipates approximately five home football games per season, with up to eight home games possible depending on the league schedule and postseason play. The proposed project would not add new home football games; rather, it would change the location where those games are held. Similarly, the proposed project could accommodate graduation at Rio Americano High School, rather than at off-site venues. Because the Rio Americano campus is generally closer to enrolled students' and their immediate families' residences than the off-site venues historically used, relocating graduation to campus would, on average, shorten attendee trip lengths; trips for family and friend attendees from elsewhere regionally or out of region would not be anticipated to be substantially affected by this change. The improved facilities could also accommodate occasional schoolwide assemblies and school-sanctioned community events. Based on District input, such events have historically been very limited and, moving forward, are expected to be accommodated primarily by shifting events that already occur at other regional venues to this location rather than creating new events. Attendance would typically range from approximately 1,000 to 3,400, with the upper end representative of a peak-attendance home football game based on counts from the 2024 and 2025 seasons. Any school-sanctioned community events would not be added as a result of the proposed project but now accommodated at this location that may have its own benefits as opposed to other regional locations that community groups currently use for such events.

The VMT Analysis compares vehicle trips and travel distances associated with home football games held at El Camino High School under existing conditions with those associated with holding the games at Rio Americano High School under project conditions. The analysis accounts for home and visiting attendees, an average vehicle occupancy of 2.36 persons per vehicle, and reductions for attendees who would remain on campus or walk or bicycle to the event (Kimley-Horn 2026b).

The proposed project would provide bleacher seating for up to approximately 2,575 people. The VMT Analysis evaluated a higher scenario of 3,400 total attendees based on prior maximum-attendance data and as a conservative analytical assumption. The 3,400-attendee scenario does not represent the proposed bleacher seating count and includes all event attendees, such as spectators, participants, staff, students, and event personnel. The scenario was used to determine whether relocating the maximum-attendance home football game to Rio Americano High School could increase local and regional VMT under a conservative attendance assumption.

Under the conservatively high attendance scenario, the VMT Analysis estimates that relocating varsity home football games from El Camino High School to Rio Americano High School would reduce event-related vehicle trips and regional gameday VMT. While the proposed project could result in a slight increase in attendance at home football games simply due to the nature of the game being at the students' campus, as determined through the use of Replica mobility analytics data under the VMT analysis prepared for the proposed project (Kimley-Horn 2026b) it also would be more centrally-located to most of the Rio Americano High School-enrolled students

and families, allowing for more students to stay on campus after school or walk or bicycle to the event rather than travel by vehicle as they would need to in order to get to the farther El Camino High School location. As such, the average trip distance for home attendees would decrease, and the trip rates, even with an increase in attendance, would also decrease, as detailed in Appendix E. Alternatively, based on the distance from visiting school locations to El Camino High School (existing home game host location) versus Rio Americano High School (home game location with implementation of the proposed project), visiting attendee trip distance was determined to potentially increase as much as 3 miles per trip, based on the conservative assumption used in this analysis, which was the visiting team that, based on that team's home campus location, would be increased the most based on a shift to the Rio Americano High School campus. Travel distances for visiting attendees would vary depending on the location of the visiting school, but the analysis used a conservative approach applying the visiting school distance with the largest increase in trip distance caused by the relocation was used for the visiting school to estimate visitor VMT. Based on the trip rates and distances for each the home and visiting attendees for existing and proposed project conditions, the highest-attended football game held at El Camino High School is estimated to produce 19,077 total VMT, while that game at Rio Americano High School stadium would produce 16,980 VMT, for a net regional reduction of 2,097 gameday VMT with implementation of the proposed project (Kimley-Horn 2026b).

Football games are expected to generate the greatest number of stadium-related trips. Other athletic practices and competitions would continue to occur at Rio Americano High School and would not substantially increase in attendance as a result of the proposed improvements. Therefore, the conservatively high football-game scenario provides the basis for evaluating the potential VMT effects of other project-related stadium uses. The proposed project would not conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b). This impact would be **less than significant**.

Impact 4.4-3: Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Construction

The proposed project does not propose any change to the surrounding transportation network, and no such change would be necessary or appropriate based on the nature of the project. Construction would temporarily add construction-worker vehicles, material-delivery trucks, and vehicles transporting construction equipment to the local roadway network.

Construction access would be provided through the main campus entrance at American River Drive and Saverien Drive and along the existing fire access lane west of the track and field facility. Equipment and materials would be staged adjacent to the existing Raider Stadium within school property. Construction would occur between 7:00 A.M. and 4:00 P.M. on weekdays, and is anticipated to occur during the summer months, when classes are not in session, thereby reducing potential conflicts with regular school arrival and dismissal traffic.

Construction-related traffic would be minor, temporary, and would use existing roadways and campus access points. The proposed project would not create a new roadway design feature or introduce a permanent incompatible use of the surrounding roadway system. Therefore, construction would not substantially increase transportation hazards due to a geometric design feature or incompatible use. The construction impact would be **less than significant**.

Operation

The proposed project would use the existing surrounding roadway network and campus driveways (see Exhibit 4.4-1) and does not propose any change to the surrounding transportation network, and no such change would be necessary or appropriate based on the nature of the project. The potential for transportation hazards would instead be associated with temporary increases in vehicles, pedestrians, and bicyclists before and after intermittent stadium events.

The proposed project would provide bleacher seating for up to approximately 2,575 people. With implementation of the proposed project, the District anticipates hosting approximately five varsity home football games per season at Raider Stadium, with up to eight home games possible depending on the league schedule and postseason play. Other existing athletic practices and competitions would continue to occur at Raider Stadium and may be scheduled later in the evening but would not substantially increase in frequency or attendance.

Operation of the proposed project would not create a transportation hazard associated with a new or modified geometric design feature or introduce a permanently incompatible use of the surrounding roadway system. Potential hazards associated with event-related pedestrian, bicycle, and vehicle activity are discussed below.

Bicycle and Pedestrian Safety

A significant impact related to bicycle and pedestrian safety could occur if the proposed project would result in unsafe conditions or conflicts involving pedestrians, bicyclists, and motor vehicles. American River Drive and Saverien Drive have existing Class II bicycle lanes and sidewalks in the vicinity of Rio Americano High School. The Jedediah Smith Memorial Trail multi-use path south of the campus also provide a dedicated route for pedestrians and bicyclists. The proposed project would not remove or modify these facilities.

The proposed project would install six 15-foot-tall pedestrian safety light poles along the existing paved fire lane between the south end of the main parking lot and Raider Stadium. The illuminated fire lane would serve as a pedestrian ingress and egress route between the main on-campus parking area and the stadium. Two existing wood utility poles within the fire lane would also be removed. As described above, approximately 537 existing parking spaces were assumed to be available for general event parking, and an on-campus overflow area would provide an estimated 135 additional spaces, resulting in a total on-campus event parking supply of approximately 672 spaces (up to 697 when accounting for the 25 EV-designated spaces). For the more general or average football game for which attendance counts range from about 1,000 to 1,700, and assuming some increase in attendance due to use of the home stadium location, the analysis assumed up to 2,200 attendees, approximately 10 percent of which would likely stay on campus after school, walk or bike due to proximity to the school, and approximately 1,945 would drive, generating parking demand for approximately 823 spaces based on the conservative estimate of an average 2.36 persons per vehicle. Accounting for on-site parking and the estimated 327 on-street parking spaces along American River Drive and Saverien Drive, there would be a parking surplus relative to estimated parking demand.

Under the conservatively high scenario of 3,400 total attendees, which exceeds the proposed bleacher capacity of approximately 2,575 people but reflects the single highest-attended game of the 2024 and 2025 seasons, approximately 10 percent are likely stay on campus after the school day or to walk or bike to the event due to proximity to the school, and approximately 3,060 attendees were estimated to travel by vehicle, generating parking demand for approximately 1,295 vehicles, resulting in an estimated on-campus parking deficit of

approximately 623 spaces (or 598 when accounting for the 25 on-site EV-designated spaces). The 3,400-attendee scenario exceeds the proposed approximately 2,575-person bleacher capacity and represents a conservative evaluation of a highly attended event rather than anticipated attendance at a general event (Kimley-Horn 2026a). Accounting for the approximately 327 on-street parking spaces identified along roadway segments near the campus, there would be an estimated residual demand of approximately 296 spaces (or 271 when accounting for the 25 on-site EV-designated spaces) under the conservatively high event attendance scenario. Additional street parking is available along American River Drive, Saverien Drive, and nearby public streets within walking distance of the campus.

Actual parking demand would vary depending on event attendance. During highly attended events, parking demand could exceed the available on-campus and identified on-street parking supply, causing attendees to park farther from the campus and increasing pedestrian activity along and across nearby roadways after dark. The LTA reviewed pedestrian conditions in the project vicinity and determined that available sight distance was adequate. However, the closest identified pedestrian crossing is at the all-way stop-controlled intersection of American River Drive and Saverien Drive, and no midblock pedestrian crossing facilities are present in the area reviewed. As a result, it is possible that some attendees could cross outside designated locations, increasing the potential for conflicts with motor vehicles (Kimley-Horn 2026a).

Moreover, general campus events that may be accommodated with implementation of the proposed project are not anticipated to generate crowds of similar magnitude to “general event” home football games and are therefore not anticipated to result in substantial off-site parking along American River Drive. For example, as shown in Appendix E to the LTA (Kimley-Horn 2026a), attendance at the reviewed football games other than the highest-attended rivalry game ranged from approximately 1,000 to 1,700. As a result, additional pedestrian crossing locations/enhancements along American River Drive should be not necessitated by the proposed project (Kimley-Horn 2026a).

The District would employ Night Event Management Standards in conjunction with the high school’s existing operations, policies, and procedures. The standards would address communications with attendees and visiting schools, volunteer responsibilities, and management of on- and off-site parking. However, additional project-specific measures would be required to identify designated off-site parking locations, address parking demand that exceeds the available managed supply, ensure safety of off-campus pedestrian crossing, and establish event-specific pedestrian and vehicle control locations.

Without designated off-site parking locations, appropriate pedestrian crossing treatments, or project-specific procedures for managing parking demand and directing pedestrians and vehicles, highly attended events at the Raider Stadium with implementation of the proposed project could increase vehicle circulation on surrounding streets and conflicts among pedestrians, bicyclists, and motor vehicles. Therefore, the impact related to event parking and bicycle and pedestrian safety would be **potentially significant**.

Vehicle Circulation and Queuing

A transportation hazard could occur if an event-related vehicle queue exceeded the available storage area and extended into a through travel lane, bicycle lane, pedestrian crossing, driveway, or other transportation facility where it could create conflicts among motorists, bicyclists, and pedestrians. However, automobile delay or vehicles waiting within a designated turn lane or on-campus driveway would not, by itself, constitute a transportation hazard or environmental impact.

The LTA reviewed how long vehicle lines (queues) could get for key turning movements during the Friday evening football-game period, using a conservative “95th-percentile” measure (a near worst-case condition that is expected to occur only occasionally).

The following describes conditions with implementation of the proposed project under the average general event conditions of event attendance of 2,200 people. At American River Drive and Saverien Drive/Project Driveway 2, the projected westbound left-turn queue would be approximately 25 feet compared with approximately 190 feet of available vehicle space, and the projected eastbound left-turn queue would be approximately 25 feet compared with approximately 200 feet of available vehicle space. At American River Drive and Jacob Lane, the projected eastbound left-turn queue would be approximately 25 feet compared with approximately 200 feet of available vehicle space. Because the projected vehicle lines are shorter than the available turn-lane space, vehicles are expected to remain within the turn lanes and not spill back into through lanes. Therefore, these conditions would not create a transportation hazard (Kimley-Horn 2026a). At Fair Oaks Boulevard and Saverien Drive, the LTA reports a projected westbound left-turn queue of approximately 615 feet compared with approximately 195 feet of available painted left-turn-pocket vehicle space. The projected queue would therefore extend beyond the existing left-turn pocket vehicle space.

The following describes conditions with implementation of the proposed project under the conservative maximum-attendance event with 3,400 people. At American River Drive and Saverien Drive/Project Driveway 2, the projected westbound left-turn queue would be approximately 25 feet compared with approximately 190 feet of available vehicle space, and the projected eastbound left-turn queue would be approximately 25 feet compared with approximately 200 feet of available vehicle space. At American River Drive and Jacob Lane, the projected eastbound left-turn queue would be approximately 25 feet compared with approximately 200 feet of available vehicle space. Because the projected vehicle lines are shorter than the available turn-lane space, vehicles are expected to remain within the turn lanes and not spill back into through lanes. Therefore, these conditions would not create a transportation hazard (Kimley-Horn 2026a). At Fair Oaks Boulevard and Saverien Drive, the LTA reports a projected westbound left-turn queue of approximately 1,055 feet compared with approximately 195 feet of available painted left-turn-pocket storage. The projected queue would therefore extend beyond the existing left-turn pocket.

Because, under the conservative peak-event scenario, the projected westbound left-turn queue would substantially exceed the available painted storage and could interfere with westbound through traffic without additional queuing capacity and event-specific traffic controls, the proposed project could increase transportation hazards at Fair Oaks Boulevard and Saverien Drive during highly attended events. However, as

As discussed above, highly attended nighttime events could also increase conflicts among pedestrians, bicyclists, and motor vehicles associated with off-site parking and travel between parking areas and Raider Stadium. Therefore, the operational impact related to event parking, bicycle and pedestrian safety, vehicle circulation, and queuing would be **potentially significant**.

Mitigation Measures

Mitigation Measure 4.4-3a: Update the Memorandum of Understanding with Jesuit High School for Shared Parking Use Agreement

Before the first varsity home football game or other nighttime stadium event anticipated to require off-site parking, which would be an estimated attendance of approximately 1,585 persons or more (a data point that can be adjusted through monitoring of measured demand and parking conditions to identify the capacity that is accommodated through on-site parking), the District shall coordinate with Jesuit High School for a Shared Parking Use Agreement, such that attendees to Rio Americano High School events may utilize on-site parking at Jesuit High School to accommodate parking needs when the Rio Americano High School on-site parking capacity would be exceeded. The Shared Parking Use Agreement shall include communication protocol to both confirm that there are not existing high-attendance event occurring at Jesuit High School that would preclude the availability of excess parking, as well as signage direction attendees to and security protocol to ensure that on-site Jesuit parking areas are open and available to Rio Americano High School event attendees.

Mitigation Measure 4.4-3b: Implement an Event Transportation Management Plan

Before the first varsity home football game or other nighttime stadium event anticipated to require off-site parking, the District shall update its Night Event Management Standards to incorporate an Event Transportation Management Plan prepared by a qualified transportation professional. The District shall implement the Event Transportation Management Plan for each such event. The plan shall:

- Estimate anticipated event attendance and parking demand and identify the number and location of available on-campus and overflow parking spaces.
- Identify designated legal off-site parking locations and pedestrian routes or transportation arrangements between those locations and Raider Stadium.
- Provide advance information to attendees regarding available parking, designated pedestrian routes, and applicable parking restrictions.
- Provide event staff and directional signs at campus access points, parking areas, and locations where substantial pedestrian and vehicle conflicts are anticipated.
- Identify the roadway crossing location or locations that attendees would be directed to use and implement appropriate safety treatments identified in the LTA, which may include high-visibility crosswalk markings, parking restrictions on crossing approaches, nighttime lighting, pedestrian crossing-warning signs, and an advance yield or stop line and associated signage.
- Prevent event-related parking, signs, equipment, or vehicle queues from obstructing driveways, sidewalks, bicycle lanes, pedestrian crossings, accessible routes, fire lanes, or emergency-access routes.

- Designate the campus driveways that would serve as the principal entrances and exits during stadium events, maintain internal connections among campus parking areas, provide signs indicating when parking areas are full, and establish procedures for managing concentrated post-event departures.
- Following the first highly attended nighttime event, review the effectiveness of the Event Transportation Management Plan and revise it as necessary to address observed parking, pedestrian, bicycle, vehicle-circulation, queuing, or emergency-access conditions. Specifically, have monitoring to observe for any exceedances of queueing lengths at the identified project area intersections (i.e., Saverien Drive and Fair Oaks Boulevard, American River Drive and Saverien Drive, or along American River Drive at the westernmost and easternmost campus driveway entrances) that extend into or obstruct a through travel lane, bicycle facility, pedestrian crossing, driveway, or other conflicting transportation facility, as well as to direct and observe for appropriate use of available pedestrian crossings. If traffic congestion results in queuing exceedances, the Transportation Management Plan will be reviewed and revised to increase parking lot personnel directing traffic to appropriate parking, including consideration of hired third-party traffic management personnel. If instances of pedestrian crossings outside of available marked crosswalks, this will be noted and additional crossing personnel engaged at high-capacity events to direct appropriate pedestrian crossing.

Mitigation Measure 4.4-3c: High-Capacity Event Access and Circulation Management

To promote efficient event access and circulation, the following access and circulation management measures shall be implemented for events anticipated to approach or exceed available on-site parking capacity:

- The intersection of American River Drive and Saverien Drive should serve as the main entrance and exit for attendees using on-site parking. The entryway immediately west of this intersection should be closed to minimize conflict points.
- The intersection of American River Drive and the westernmost Rio Americano High School Driveway access should remain open for attendees and signage should be used to direct attendees to Parking Lot 2 and guide them from Parking Lot 2 to Raider Stadium.
- The intersection of American River Drive and the easternmost Rio Americano High School Driveway access should also function as a secondary entry and exit for attendees. The two access points between Parking Lots 4 and 5 should remain open to facilitate traffic flow, especially in the event of overflow parking.

Significance after Mitigation

The LTA notes that event-specific signal timing and removal or modification of the existing concrete median behind the westbound left-turn pocket at Saverien Drive and Fair Oaks Boulevard could allow vehicles to queue within the existing two-way left-turn lane and limit potential interference with westbound through traffic (Kimley-Horn 2026a). However, such permanent modifications would not be appropriate or necessary to address the very limited number of new peak-attendance events that could occur with implementation of the proposed project, particularly because such events would not overlap with peak-hour traffic demand on the surrounding transportation network, which would occur earlier in the afternoon. Furthermore, implementation of Mitigation

Measure 4.4-3a would help reduce this queue because some attendees would instead turn in at Jesuit for use of this off-site parking.

Implementation of Mitigation Measures 4.4-3a through 4.4-3c would require the District to develop a use agreement with nearby Jesuit High School for off-site parking during high-attendance events, manage event parking and circulation, direct motorists and pedestrians to designated locations and routes, implement appropriate pedestrian crossing treatments, and maintain unobstructed pedestrian, bicycle, and emergency-access facilities. If anticipated parking demand could not be accommodated by the available managed supply, the District would be required to reduce vehicle parking demand, or limit attendance. Mitigation Measure 4.4-3b would also require evaluation of the required Transportation Management Plan effectiveness during the initial high-attendance event. Therefore, the operational impact related to event parking, bicycle and pedestrian safety, vehicle circulation, and queuing would be **less than significant with mitigation**.

Impact 4.4-4: Result in inadequate emergency access?

Construction

Construction access would be provided through the main campus entrance at American River Drive and Saverien Drive and along the existing paved fire access lane west of the track and field facility. Construction equipment and materials would be staged adjacent to Raider Stadium within the school campus. Construction would occur between 7:00 A.M. and 4:00 P.M. on weekdays over approximately three to four months and would primarily occur during the summer, when classes are not in session.

The proposed improvements would not modify or result in any closure of American River Drive, Saverien Drive, Fair Oaks Boulevard, or another public roadway used by emergency responders. Installation of the pedestrian safety lights would require trenching and other construction activity within the existing paved fire lane. Emergency access to and through the campus would be maintained throughout construction. If construction activities temporarily obstructed the existing paved fire lane, a clearly designated alternate emergency-access route would be provided. Therefore, construction of the proposed project would not result in inadequate emergency access. The construction impact would be **less than significant**.

Operation

The proposed project would not permanently alter the surrounding public roadway network or remove an existing campus driveway. Rio Americano High School would continue to be accessible from American River Drive through multiple existing campus driveways. Emergency access to the project site would not change from existing conditions, which includes multiple drive aisles from American River Drive. The existing on-site circulation network, which is regulated by the California Department of Education to ensure safe pedestrian and vehicular ingress and egress, including emergency situations, would continue to be used.

The LTA recommends that American River Drive at Saverien Drive/Project Driveway 2 and American River Drive at Project Driveway 3 serve as the principal entrances and exits during stadium events. Project Driveway 1 would remain open, and the internal connections between Parking Lots 4 and 5 would also remain open to facilitate circulation and access to overflow parking. The LTA further recommends traffic-control staff and signs directing vehicles to available parking areas.

The proposed project would install pedestrian safety lighting along the existing paved fire lane between the main parking area and Raider Stadium. During nighttime events, this route would also be used by pedestrians traveling between the parking area and the stadium. Highly attended events could therefore result in temporary concentrations of pedestrians and vehicles near campus access points and along the fire lane.

As discussed under Impact 4.4-3, event-related queues or unmanaged event circulation could interfere with emergency vehicle travel if they obstructed a public travel lane, campus driveway, or designated fire lane. Without project-specific event traffic controls, highly attended events could temporarily interfere with emergency access to or through the campus. Therefore, the operational impact related to emergency access would be **potentially significant**.

Significance after Mitigation

Implementation of Mitigation Measures 4.4-3a and 4.4-3b would require event-related vehicles, pedestrians, parking, and queues to be managed so that campus driveways, public travel lanes, the fire lane, and designated emergency-access routes remain unobstructed and accessible to emergency responders. Therefore, the operational impact related to emergency access would be **less than significant** with mitigation.

4.5 TRIBAL CULTURAL RESOURCES

This section addresses identification and impacts analysis of Tribal Cultural Resources (TCRs) by implementation of the proposed project. TCRs, as defined by Assembly Bill (AB) 52, Statutes of 2014, in Public Resources Code (PRC) Section 21074, are sites, features, places, cultural landscapes, sacred places and objects, with cultural value to California Native American Tribes. A Tribal Cultural Landscape is defined as a geographic area (including both cultural and natural resources, and the wildlife therein), associated with a historic event, activity, or person, or exhibiting other cultural or aesthetic values. TCRs may contain physical cultural remains or may be places within a landscape such as gathering places, sacred sites, landscape features, plants, or other locations that help maintain religious and cultural practices, traditions, beliefs, lifeways, arts, crafts, or social institution of a living tribal community. Unanticipated Native American human remains would also be considered a TCR. This category of resources under CEQA is to recognize that Tribes have unique knowledge and information about sensitive resources important to the self-identity of tribal communities and can only be identified by members of the Native American community, thus requiring consultation under CEQA. Historical resources, unique archaeological resources, or non-unique archaeological resources may also be TCRs if they meet these criteria.

4.5.1 ENVIRONMENTAL SETTING

The proposed project would be implemented on the grounds of the existing Rio Americano High School campus, at Raider Stadium and adjacent areas within the campus. The site was originally developed as a school in 1963. Bleacher seating and small upgrades at the stadium were installed in 2006, and the current modernized and improved stadium was completed in 2019. To the south, the project site is separated from the American River Parkway (Parkway) by the American River levee. The Parkway is an open space and natural preserve area that provides recreational opportunities among the natural, aesthetic, and historical resources found along both sides of the American River. The multi-use trail atop the levee is accessible via the southeast side of Rio Americano High School and this levee trail provides connection to the Jedediah Smith Memorial Trail, which is located within the Parkway. There is no vehicular access to the portion of the Parkway near the Rio Americano High School campus; access is limited to pedestrian and bicycles only from the crown of the adjacent north bank American River levee. Although the levee crown is not part of the Parkway, it is paved (for access by levee maintenance equipment) and is available for use by pedestrian and bicyclists. Please reference Exhibit 3-2 in Chapter 3, “Project Description” for a depiction of the location of the project site.

The project site is in the indigenous tribal territory of the Nisenan.

NISENAN ETHNOHISTORY

By virtue of its geographic position, the project site lies within the traditional territory of the Nisenan (sometimes referred to as the Southern Maidu). The Nisenan belong to the Penutian linguistic family. Kroeber (1925: 392-393) recognized three Nisenan dialects—Northern Hill Nisenan, Southern Hill Nisenan, and Valley Nisenan. The Nisenan territory included the drainages of the Yuba, Bear, and American Rivers and the lower drainages of the Feather River. The Nisenan ranged from the Sierra Nevada crest to nearly sea level at the Sacramento River.

Significant Native American contact with Europeans came late near the project area. Limited encounters with explorers and trappers during the early 19th century left the Nisenan relatively unaffected (Wilson and Towne 1978: 387-397). In 1833 the Valley Nisenan were decimated by a malaria epidemic that did not spread to the Hill Tribes. However, Captain John Sutter settled in Hill Nisenan territory in 1839, and the subsequent discovery of

gold resulted in the widespread killing and persecution of the Nisenan. By 1860, disease, violence, forced relocation, and environmental destruction had greatly affected Nisenan populations and traditional systems (Moratto 1984). Today, however, the Nisenan people, with new-found political, economic, and social influence, are reinvesting in their traditional cultural and lifeways and constitute a thriving native people and culture.

CONTEMPORARY NATIVE AMERICAN SETTING

Today, Tribes are actively involved in defining their role as stewards of their ancestral sites and homelands including subject matter expertise on the identification of TCRs. TCRs represent areas of cultural significance that are rooted in or contribute to cultural practices, traditional stories, traditional knowledge, and cultural identity. TCRs provide the backdrop to religious understanding, traditional stories, knowledge of resources such as varying landscapes, bodies of water, animals and plants, and self-identity. Knowledge of place is central to the continuation and persistence of culture, even if former Tribal occupants live removed from their traditional homeland. Tribal groups view these interconnected sites and places as living entities; their associations and feelings persist and connect with descendant communities.

Historically, archaeologists focused on traditional Native American culture and ignored the active and vibrant current culture. This approach ignored the set of values maintained by the current Native American community related to their history and the landscape. Tribes view themselves as contemporary stewards of their culture and the landscape, representing a continuum from time immemorial to the present. They are resilient, vibrant, and active in the community. Tribes maintain their connection to their history and ongoing culture by practicing traditional ceremonies, engaging in traditional practices (e.g., basketry), and contributing to public education and interpretation. California has acknowledged the importance and contributions of Native American history, traditional knowledge and cultural practices, as well as the persistence of Tribes and the Tribal community via Executive Orders B-10-11 and N-15-19.

Of the Tribes contacted to consult on this project, the United Auburn Indian Community (UAIC) and the Wilton Rancheria asked to consult. The following provides a summary of the current status provided by the Tribes.

United Auburn Indian Community

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. The Tribe has deep spiritual, cultural, and physical ties to their ancestral land and are contemporary stewards of their culture and landscapes. The Tribal community represents a continuity and endurance of their ancestors by maintaining their connection to their history and culture. It is the Tribe's goal to ensure the preservation and continuance of their cultural heritage for current and future generations.

The re-establishment of the United Auburn Indian Tribe began when the United States Department of Interior documented the existence of a separate, cohesive band of Maidu and Miwok Indians, occupying a village on the outskirts of the City of Auburn in Placer County. In 1917, the United States acquired land in trust for the Auburn Band near the City of Auburn and formally established a reservation, known as the Auburn Rancheria. Tribal members continued to live on the reservation as a community despite great adversity (UAIC 2026).

In 1953, the United States Congress enacted the Rancheria Act, authorizing the termination of federal trust responsibilities to a number of California Indian Tribes including the Auburn Band. With the exception of a 2.8-

acre parcel containing a tribal church and a park, the government sold the land comprising the Auburn Rancheria. The United States terminated federal recognition of the Auburn Band in 1967 (UAIC 2026).

In 1991, surviving members of the Auburn Band reorganized their tribal government as the United Auburn Indian Community and requested the United States to formally restore their federal recognition. In 1994, Congress passed the Auburn Indian Restoration Act, which restored the Tribe's federal recognition. The Act provided that the Tribe may acquire land in Placer County to establish a new reservation (UAIC 2026).

In 2002, UAIC acquired 49.21 acres under a land trust with the Bureau of Indian Affairs (BIA) to build and operate a casino (BIA 2002 February 5). In 2018, UAIC entered into another land trust with the BIA, for 1,100 acres in Placer County to build 110 single-family homes and other amenities for tribal members (*Indian Country Today* 2010 September 12).

Wilton Rancheria

Wilton Rancheria is a federally recognized Tribe. Members of Wilton Rancheria are descendants of the Penutian linguistic family identified as speaking the Miwok dialect. The Tribe's indigenous territory encompasses Sacramento County. Between March 1851 and January 1852, three commissioners hastily negotiated eighteen treaties with representatives of some of the indigenous population in California. The Treaty of the Forks of the Cosumnes River ceded the lands on which the Wilton Rancheria in Sacramento County was later established, but promised to establish a rancheria on the Cosumnes River (Wilton Rancheria 2024).

The Tribe's ancestors came back from nearly being annihilated only to have their children taken to boarding schools that stripped their indigenous language and culture further. Finally, in July 1928, the United States acquired land in trust for the Miwok people that were living in Sacramento County. A 38.77-acre tract of land in Wilton was purchased from the Cosumnes Company which formally established the Wilton Rancheria. However, under the California Rancheria Act of 1958, the federal government terminated federal recognition of the tribe in 1964 (Wilton Rancheria 2024).

In 1991, surviving members of Wilton Rancheria reorganized their tribal government and in 1999 requested the United States formally restore their federal status. A United States District Court Judge restored Wilton Rancheria as a Federally Recognized Tribe in 2009. It is the only federally recognized tribe in Sacramento County, with its administration office located in the City of Elk Grove (Wilton Rancheria 2024).

In May 2024, Wilton Rancheria purchased 77-acres of their original Rancheria land that was taken from them by the federal government in 1959 after enactment of the California Rancheria Act of 1958. The land will be used to establish a community and cultural center, as well as teach non-natives about their history and who they are today (*Sacramento Bee* 2024 May 14).

4.5.2 REGULATORY SETTING

FEDERAL

No federal plans, policies, regulations, or laws apply to the proposed project.

STATE

California Environmental Quality Act

CEQA offers directives regarding impacts on historical resources and unique archaeological resources. Generally, CEQA states that if implementation of a project would result in significant environmental impacts, then public agencies should determine whether such impacts can be substantially lessened or avoided through feasible mitigation measures or feasible alternatives. This general mandate applies equally to significant environmental effects related to certain cultural resources.

Only significant cultural resources (e.g., “historical resources” and “unique archaeological resources”) need to be addressed. The State CEQA Guidelines define a “historical resource” as “a resource listed or eligible for listing in the California Register of Historical Resources” (CEQA Guidelines, Section 15064.5, subdivision [a][1]; see also Public Resources Code [PRC] Sections 5024.1, 21084.1). A historical resource may be eligible for inclusion in the California Register of Historical Resources (CRHR), as determined by the State Historical Resources Commission or the lead agency, if the resource:

1. Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; or
2. Is associated with the lives of persons important in our past; or
3. Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
4. Has yielded, or may be likely to yield, information important in prehistory or history.

In addition, a resource is presumed to constitute a “historical resource” if it is included in a “local register of historical resources” unless “the preponderance of evidence demonstrates that it is not historically or culturally significant” (CEQA Guidelines, Section 15064.5, subdivision [a][2]). The State CEQA Guidelines require consideration of unique archaeological sites (Section 15064.5; see also PRC Section 21083.2). A “unique archaeological resource” is defined as an archaeological artifact, object, or site about which it can be clearly demonstrated that, without merely adding to the current body of knowledge, there is a high probability that it meets any of the following criteria (PRC 21083.2):

1. Contains information needed to answer important scientific research questions and that there is a demonstrable public interest in that information.
2. Has a special and particular quality such as being the oldest of its type or the best available example of its type.
3. Is directly associated with a scientifically recognized important prehistoric or historic event or person.

If a cultural resource does not meet the criteria for inclusion in the CRHR but meets the definition of a unique archaeological resource as outlined in Section 21083.2 of the PRC, it is entitled to special protection or attention under CEQA. Treatment options under Section 21083.2 of CEQA include activities that preserve such resources in place, in an undisturbed state. Other acceptable methods of mitigation under Section 21083.2 include excavation and curation or study in place without excavation and curation (if the study finds that the artifacts would not meet one or more of the criteria for defining a “unique archaeological resource”).

The State CEQA Guidelines require that excavation activities be stopped whenever human remains are uncovered, and that the county coroner be called to assess the remains. If the county coroner determines that the remains are those of Native Americans, the Native American Heritage Commission (NAHC) must be contacted within 24 hours. At that time, Section 15064.5(d) of the State CEQA Guidelines directs the lead agency to consult with the appropriate Native Americans, as identified by the NAHC, and directs the lead agency (or project applicant), under certain circumstances, to develop an agreement with the Native Americans for the treatment and disposition of the remains. The District as the lead agency would be responsible for compliance with CEQA.

Assembly Bill (AB) 52

AB 52 (effective July 1, 2015) added Public Resources Code Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3 to CEQA, relating to consultation with California Native American tribes, consideration of TCRs, and confidentiality. AB 52 provides procedural and substantive requirements for lead agency consultation with California Native American tribes and consideration of effects on TCRs, as well as examples of mitigation measures to avoid or minimize impacts to TCRs. AB 52 establishes that if a project may cause a substantial adverse change in the significance of a TCR, that project may have a significant effect on the environment. Lead agencies must avoid damaging effects to TCRs, when feasible, and shall keep information submitted by tribes confidential.

AB 52 requires a lead agency to consult with California Native American tribes that are traditionally and culturally affiliated with the geographic area of the proposed project, if the tribe requested to the lead agency, in writing, to be informed by the lead agency of proposed projects in that geographic area and the tribe requests consultation. Public Resources Code Section 21080.3.1(d) states that within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project location and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

Public Resources Code, Section 5097.98

Public Resources Code Section 5097.98 states that whenever the Native American Heritage Commission receives notification of Native American human remains from a county coroner, the Native American Heritage Commission shall immediately notify the most likely descendant. The most likely descendant may, with permission from the owner of the land in which the human remains were found, inspect the site and recommend to the owner or the responsible party conducting the excavation work a means for treating and/or disposing of the human remains and any associated grave goods. The most likely descendant is required to complete their site inspection and make their recommendation within 48 hours of their notification from the NAHC.

California Health and Safety Code, Section 7052 and 7050.5

Section 7052 of the California Health and Safety Code states that the disturbance, mutilation, or removal of interred human remains is a felony if the remains are within a dedicated cemetery and a misdemeanor if interred outside of a dedicated cemetery. Section 7050.5 requires that construction or excavation be stopped in the vicinity of discovered human remains until the coroner examines the find and determines whether the remains are subject

to various laws, including recognizing whether the remains are or may be those of a Native American. If determined to be Native American, the coroner must contact the NAHC.

California Native American Graves Protection and Repatriation Act. Health and Safety Code Section 8010 through 8030

In the California Health and Safety Code, Division 7, Part 2, Chapter 5 broad provisions are made for the protection of Native American cultural resources. The Act sets the state policy to ensure that all California Native American human remains and cultural items are treated with due respect and dignity. The Act also provides the mechanism for disclosure and return of human remains and cultural items held by publicly funded agencies and museums in California. Likewise, the Act outlines the mechanism with which California Native American tribes not recognized by the federal government may file claims to human remains and cultural items held in agencies or museums.

4.5.3 METHODOLOGY

Review of the Rio American High School Sports Facility pedestrian survey conducted in 2010 by AECOM, a new records search, and Native American consultation efforts were conducted to establish prior, and new, identification efforts of TCRs that may be present in the project site, and furthermore, may be impacted by implementation of the proposed project. As part of the Native American consultation efforts, the UAIC also conducted in-house research to identify any TCRs for this project and shared their methodology and results with AECOM.

2010 PREVIOUS EIR

A pedestrian survey by AECOM archaeologists of the future stadium footprint at Rio American High School was conducted in 2010 and no precontact or historic-era cultural resources were present within, or in the vicinity (AECOM 2010).

NCIC RECORDS SEARCH

A records search conducted by the North Central Information Center (NCIC) of the California Historical Resources Information System on November 13, 2025 (NCIC File No. SAC-25-187) indicated two previous cultural resources studies have been conducted within the project site and five studies had been conducted within 0.1-mile of the project site. No tribal cultural resources were identified, only historic-age built environment cultural resources were identified.

The only previously recorded cultural resource identified within the project site is the Rio Americano High School campus that was recorded and evaluated on Department of Parks and Recreation (DPR) 523 series forms in 2009 and was assigned Primary number P-34-003906. This 2009 recordation and evaluation found the Rio Americano High School campus ineligible for listing in the National Register of Historic Places (NRHP). Of the five studies conducted within 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, and passes along the southern boundary of the campus property, outside of the campus boundary and along the north side of the American River. The levee system was evaluated as ineligible for listing in the NRHP in 2001.

NATIVE AMERICAN CONSULTATION

On behalf of the District, a Sacred Lands Files (SLF) search and request for AB 52 Consultation List was requested by AECOM from the 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 SLF 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 the 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, as described above. 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. Finally, the letter also reported the positive SLF search results, and formally invited tribal consultation on the project in accordance with AB 52.

Emails were sent to the following Tribes:

- ▶ United Auburn Indian Community of the Auburn Rancheria
- ▶ Wilton Rancheria
- ▶ TSI-AKIM Maidu of the Taylorsville Rancheria
- ▶ Shingle Springs Band of Miwok Indians
- ▶ Colfax-Todds Valley Consolidated Tribe

United Auburn Indian Community of the Auburn Rancheria

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 requested to formally consult government to government under AB 52.

On January 28, 2026, AECOM responded to Ms. Starkey's information requests via email. Regarding the proposed extent and maximum depth of the proposed ground disturbing activities: The facilities proposed for improvement already exist at this high school campus, so the extent of improvements and associated ground-disturbing activities is limited. Ground disturbance would be required for (1) trenching for electricity for lighting along one pathway, (2) approximately three-foot-diameter holes approximately 16 feet below the ground surface for the four new stadium light poles, and (3) site clearing, grading, foundation construction and paving to extend existing concrete pad areas to accommodate the new, larger bleachers. The total ground disturbance is estimated to be approximately 2,900 square feet of trenching along the pedestrian access pathway, 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 construction of any project components. A hyperlink to a District-created website about the stadium improvement project, including

the Initial Study and Notice of Preparation of a focused EIR was also included in the email. Lastly, dates, times, and format preferences to consult were requested.

On February 3, 2026, Ms. Starkey responded to AECOM via email with thanks for the additional information regarding ground disturbing activities, which she discussed with Tribal Historic Preservation Officer, Josef Fore. Based on their discussion, they provided background, methodology, results, and three mitigation measures (Paid Tribal Monitoring for Ground Disturbing work [trenching, grading, hole for light poles]; Unanticipated Discoveries of TCRs; and Cultural Awareness and Sensitivity Training) to be included in the TCR chapter of the EIR. Ms. Starkey concluded her email stating that if the Lead Agency (the District) agrees with the mitigation measures, AB 52 consultation could be closed, pursuant to § 21080.3.2. (b)(1), and that the cultural awareness brochure can be distributed to construction personnel prior to ground disturbing activities.

On February 20, 2026, AECOM responded to Ms. Starkey that the background, methodology, results would be added to the TCR chapter and that the District agreed with UAIC's recommended mitigation measures. AECOM would then compile the text of the three UAIC mitigation measures with proposed revisions and send them to Ms. Starkey to review. AECOM provided the UAIC mitigation measures with proposed revisions in a Word document to Ms. Starkey to review via email on June 15, 2026.

On June 16, 2026, Ms. Starkey sent AECOM via email a track-changed version of the UAIC mitigation measures with AECOM's proposed revisions. Ms. Starkey also explained the reasoning behind the revisions, largely regarding tribal monitoring compensation, that UAIC would conduct the Tribal Cultural Awareness trainings free of charge, and if the project requires a reburial, the District would be financially responsible.

On July 6, 2026, Ms. Starkey requested to officially close AB 52 consultation if the tribal monitoring compensation revision was accepted to the mitigation measures. A revised version of mitigation language was shared on August 4th and August 5th and consultation was officially closed by UAIC on August 5, 2026.

Wilton Rancheria

The Department of Cultural Preservation at Wilton Rancheria (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 area of potential effect, and to select a meeting date.

On January 28, 2026, AECOM responded to Wilton Rancheria's detailed consultation and information requests via email. Regarding the proposed extent and maximum depth of the proposed ground disturbing activities: The facilities proposed for improvement already exist at this high school campus, so the extent of improvements and associated ground-disturbing activities is limited. Ground disturbance would be required for (1) trenching for electricity for lighting along one pathway, (2) approximately three-foot-diameter holes approximately 16 feet below the ground surface for the four new stadium light poles, and (3) site clearing, grading, foundation construction and paving to extend existing concrete pad areas to accommodate the new, larger bleachers. The total ground disturbance is estimated to be approximately 2,900 square feet of trenching along the pedestrian access

pathway, 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. A hyperlink to a District-created website about the stadium improvement project, including the Initial Study and Notice of Preparation of a focused EIR was also included in the email. The recent positive SLF search results and negative archaeological pedestrian survey results in 2010 were reiterated. And lastly, dates, times, and format preferences to consult were requested.

On April 8, 2026, AECOM sent a follow-up email to Wilton Rancheria stating that the District welcomes and encourages input and a consultation meeting was arranged. On April 29, 2026, a consultation meeting was held via videoconference with two members representing Wilton Rancheria and one AECOM staff member, representing the District. AECOM reiterated the proposed ground disturbing activities, shared in the January 28, 2026 email, the positive SLF results, the only previously recorded resource in 0.1 mile of the project site is an earthen levee, and that the 2010 pedestrian survey by archaeologists of the stadium footprint did not identify any precontact or historic-era cultural resources. Wilton Rancheria stated their main concern about the proposed project was the positive SLF results and that they are aware of a village site within 0.25 mile of the project site. Additional concerns were raised based on the location of the project near the American River and American River bike path. Rivers are incredibly important to tribes and have been used by them for thousands of years. This is reflected in isolated cultural resources finds uncovered during construction of the American River bike path. Wilton Rancheria stated they would provide ethnographic information to be included in the TCR chapter of the EIR.

Wilton Rancheria acknowledged that the project site was disturbed with the previous stadium improvements and that no cultural resources were discovered as part of that ground disturbing activities. However, they did recommend mitigation measures for the project. AECOM informed the representatives from Wilton Rancheria that UAIC provided recommended mitigation measures, received permission to share with Wilton Rancheria, and Wilton Rancheria reviewed.

On August 4, 2026, AECOM followed up with Wilton Rancheria to provide requested details on construction methods and to share revised mitigation language and invite additional input. Wilton Rancheria requested revisions to the mitigation language Mitigation Measure 4.5-1b: Avoid Impacts in the Case of Unanticipated Discoveries. After meeting on August 25, 2026 with Wilton Rancheria and sharing revised language, Wilton Rancheria approved the revised mitigation language and closed consultation on August 25, 2026.

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

UAIC METHODOLOGY AND RESULTS

UAIC conducted background search for the identification of TCRs for this project, which included a review of pertinent literature, historic maps, and a records search using UAIC's THRIS. UAIC's THRIS database is composed of UAIC's areas of oral history, ethnographic history, and places of cultural and religious significance, including UAIC Sacred Lands that are submitted to the NAHC. The THRIS resources shown in this region also include previously recorded indigenous resources identified through the California Historical Resources Information System as well as historic resources and survey data. According to THRIS data, there are three known TCRs, including village sites and cultural constituents less than a 1/4-mile of the project area. No known Tribal Cultural Resources are recorded in the project area.

No tribal survey for the identification of TCRs was conducted due to the built environment and low potential for surficial cultural constituents to be visible. There is a moderate to high potential for buried TCRs to be present due to the proximity of the American River, which has known village sites. Ethnographic and historic documents indicate that there were many villages along the River, at least one major village every mile or less. Not every village has been documented or formally recorded, therefore their exact locations have not been ground-truthed. Additionally, levee work has been known to redistribute cultural constituents. “Isolated” cultural constituents (cultural belongings) still have meaning and value to UAIC.

4.5.4 ENVIRONMENTAL IMPACTS AND MITIGATION MEASURES

THRESHOLDS OF SIGNIFICANCE

In accordance with Appendix G of the CEQA Guidelines, the proposed project is considered to have a significant impact on Tribal Cultural Resources if it would:

- ▶ 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:
 - Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or
 - 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 ANALYSIS

Impact 4.5-1: 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.**

Conducting consultation early in the CEQA process allows tribal governments, public lead agencies, and project proponents to discuss the level of environmental review, identify and address potential adverse impacts to TCRs, and reduce the potential for delay and conflict in the environmental review process. The intent of the consultations is to provide an opportunity for interested Native American contacts to work together with the District during the planning process to identify and protect TCRs.

On November 24, 2025, AECOM sent AB 52 notification and invitation to consult letters, via email, to each listed individual and organization on the contact list provided by NAHC. Wilton Rancheria and UAIC both responded that they wished to consult. Neither tribe identified TCRs in or near the project site, and no TCRs were identified during previous ground disturbing activities, nor in the NCIC records searches conducted in 2009 and 2025. However, there is potential for encountering buried TCRs that may be unearthed through ground disturbance during site clearing and construction. Disturbance of a TCR would result in a **potentially significant impact**.

Through the AB 52 consultation process, UAIC recommended the following three mitigation measures to reduce potential impacts to less than significant.

Mitigation Measure 4.5-1a: Implement Cultural Awareness and Sensitivity Training.

San Juan Unified School District (the District) shall require Tribal Cultural Awareness and Sensitivity Training (training) for all personnel involved in ground-disturbing construction work, including field consultants and construction workers. The District shall use the Cultural Awareness information shared by representatives of the United Auburn Indian Community (UAIC) as a part of the training.

The training shall be conducted before any project-related ground-disturbing construction activities begin at the project site. The training will include relevant information regarding sensitive cultural resources and tribal cultural resources, including applicable regulations, protocols for avoidance, and consequences of violating State laws and regulations. The training will also describe appropriate avoidance and impact minimization measures for cultural resources and tribal cultural resources that could be located at the project site and will outline what to do and who to contact if any potential cultural resources or tribal cultural resources are encountered. The training will emphasize the requirement for confidentiality and culturally appropriate treatment of any discovery of significance to Native Americans and will discuss appropriate behaviors and responsive actions, consistent with Native American tribal values. The training may be done in coordination with the project archaeologist.

All ground-disturbing equipment operators shall be required to receive the training and sign a form that acknowledges receipt of the training.

Mitigation Measure 4.5-1b: Avoid Impacts in the Case of Unanticipated Discoveries.

If any suspected tribal cultural resources or resources of cultural significance to the United Auburn Indian Community, including but not limited to features, anthropogenic/cultural soils, cultural belongings or objects (artifacts), shell, bone, shaped stones or bone, or ash/charcoal deposits are discovered by any person during construction activities including ground disturbing activities, all work shall pause immediately within 100 feet of the find, or an agreed upon distance based on the project area and nature of the find. The San Juan Unified School District (the District) or contractor shall notify all consulting tribes of the unanticipated find.

Work shall cease in and within the immediate vicinity of the find regardless of whether the construction is being actively monitored by a Tribal Monitor, cultural resources specialist, or professional archaeologist.

The District or contractor shall notify a representative of the United Auburn Indian Community (UAIC) immediately, and the Tribal Representative in coordination with the District shall determine if the find is a Tribal Cultural Resource (TCR) (PRC §21074) and the Tribal Representative shall make

recommendations for further evaluation and treatment as necessary, subject to agreement between the Tribe and the District.

Treatment and Documentation:

If the unanticipated find is determined to be a tribal cultural resource according to the determination made by the UAIC, the UAIC shall provide a recommendation within one week to the District on the on-site boundaries of the new TCR and, if feasible, identify appropriate preservation in place and avoidance measures, including redesign or adjustments to the existing construction process, and long-term management. The District shall share the UAIC recommendation with all consulting tribes. If avoidance is infeasible, the UAIC shall within one week recommend a feasible reburial location in proximity of the find where no future disturbance is anticipated. Permanent curation of TCRs will not take place unless approved in writing by the UAIC.

The construction contractor(s) shall provide secure, on-site storage for culturally sensitive soils or objects that are components of TCRs that are found or recovered during construction. Only Tribal Representatives shall have access to the storage. Storage size shall be determined by the nature of the TCR and can range from a small lock box to a conex box (shipping container). A secure (locked), fenced area can also provide adequate on-site storage if larger amounts of material must be stored.

The District and construction contractor(s) shall facilitate the respectful reburial of the culturally sensitive soils or objects. This includes providing a reburial location that is consistent with the Tribe's preferences, excavation of the reburial location, and assisting with the reburial, if feasible, upon request.

Any discoveries shall be documented on a Department of Parks and Recreation (DPR) 523 form within 2 weeks of the discovery and submitted to the appropriate California Historical Resources Information System center in a timely manner.

Work at the TCR discovery location shall not resume until authorization is granted by the District in coordination with the UAIC.

If articulated or disarticulated human remains, or human remains in any state of decomposition or skeletal completeness are discovered during construction activities, the County Coroner and the UAIC shall be contacted immediately. Upon determination by the County Coroner that the find is Native American in origin, the Native American Heritage Commission will assign the Most Likely Descendent who will work with the District to define appropriate treatment and disposition of the burials.

Mitigation Measure 4.5-1c: Notification and Invitation to Monitoring.

The District or their construction contractor shall comply with the following measure to assist with identification of TCRs at the earliest possible time during project-related earthmoving activities:

- The District or contractor shall contact the UAIC Tribal Historic Preservation Officer (thpo@auburnrancheria.com) at least 1 month prior to the initial project ground-disturbing activities, if feasible, to offer to retain the professional services of a for on-site monitoring during initial ground-disturbing activities UAIC Certified Tribal Monitor(s). The duration of the construction schedule and Tribal Monitoring shall be determined at this time.
- If the UAIC THPO recommends monitoring, contracted Tribal Monitor(s) shall monitor the vegetation grubbing, stripping, grading, trenching, and other ground-disturbing activities required for

installation of the new light poles and trenching to install conduit for the light poles and along the pedestrian egress area, or other ground disturbing activities as agreed upon by the District and the Tribe.

- UAIC Tribal Monitors or Tribal Representatives shall have the authority to direct that work be temporarily paused, diverted, or slowed within 100 feet of the immediate impact area if sites, cultural soils, or objects of potential significance are identified. The temporary pause/diversion shall be of an adequate duration for the Tribal Representative to examine the resource, up to one work day or the applicable legal timeline.
- Appropriate treatment of TCRs shall be determined consistent with Mitigation Measure 4.5-1b.
- To track the implementation of this measure, the Tribal Monitor(s) shall document field monitoring activities on a Tribal Monitor log.
- Any on-site Tribal Monitor(s) shall abide by safety protocols required by the contractor while on the construction site.
- The Tribal Monitor, in consultation with the UAIC THPO and the District shall determine a mutual end or reduction to the on-site monitoring if/when construction activities have a low potential for impacting Tribal Cultural Resources. Monitoring will be limited to ground-disturbing activities.
- In the event the Tribal Monitor does not report to the job site at the scheduled time after receiving 24-hour business day notice, construction activities may proceed without tribal monitoring. At no time, regardless of the presence or absence of a Tribal Monitor, shall suspected TCRs be mishandled or disrespected.
- The Tribe shall notify the District of, and the District shall offer to resolve any disagreement between the contractor and the Tribal Monitor if such occurs on the project.

Significance after Mitigation

Implementation of Mitigation Measures 4.5-1a through 4.5-1c would address Tribal Cultural Awareness and Sensitivity Training (training) for all personnel involved in ground-disturbing construction work, protocols for inadvertent discovery of TCRs, including cessation of construction activities proximate to the discovery and notification of the appropriate, and monitoring during ground disturbing activities. As a result, with implementation of these recommended mitigation measures, the impact on TCRs would be **less than significant with mitigation**.

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5 EFFECTS FOUND TO BE LESS THAN SIGNIFICANT

5.0 INTRODUCTION

The proposed project would have a less-than-significant impact or no impact for impacts related to agricultural resources, mineral resources, population and housing, recreation, and wildfire for the reasons discussed below.¹

5.1 AGRICULTURAL AND FORESTRY RESOURCES

Based on Appendix G of the CEQA Guidelines, an impact related to agricultural and forestry resources is considered significant if the proposed project would do any of the following.

Impact 5.1-1: 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**.

Impact 5.1-2: 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). Public schools are a primary, permitted use in areas that are zoned RD-4 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**.

Impact 5.1-3: 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. No trees would be removed as a part of the project. The project site does not include forest land, timberland, or timberland zoned Timberland Production. Thus, there would be **no impact**.

Impact 5.1-4: 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

¹ The approach in this EIR follows the guidance of Public Resources Code Section 21002.1: “the purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided...To provide more meaningful public disclosure, reduce the time and cost required to prepare an environmental impact report, and focus on potentially significant effects on the environment of a proposed project, lead agencies shall... focus the discussion in the environmental impact report on those potential effects on the environment of a proposed project which the lead agency has determined are or may be significant. Lead agencies may limit discussion on other effects to a brief explanation as to why those effects are not potentially significant.”

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**.

Impact 5.1-51: 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 project 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**.

5.2 AIR QUALITY

Impact 5.2-1: 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 (PM_{10}).

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 PM_{10} 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 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 applicable 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 5.2-1, 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 5.2-2. 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 5.2-1: 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 5.2-1, 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**.

Impact 5.2-2: 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, 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 G for detailed emissions inputs and assumptions.

As shown in Table 5.2-1, 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 5.2-1. 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 of the proposed project, 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 traveled (VMT), as not all events would be peak events. As indicated in Appendix E, a peak event is estimated to generate 1,295 vehicles, or 2,590 one-way trips. The annual trip generation rate is based on the anticipated new events that would occur as a result of the proposed project as outlined in Table 3-1, which includes 5-8 football games, up to 4 school assemblies, and graduation. Four of the football games (i.e., one rivalry game and three potential playoff games), graduation, and four new potential school-sanctioned community events were assumed to be peak-attendance events that could generate 1,295 vehicles. The remaining four football games that would relocate from off-site to the Raider Stadium are assumed to be average-attendance games as outlined in Appendix E, generating 823 vehicle trips. Therefore, total

annual trips for the purposes of the air quality analysis were estimated to be 6,826 one-way trips.² The average trip distance for the air quality analysis was estimated using a weighted average calculation based on the number of home and away attendees and the average trip distance for home and away attendees as indicated in Appendix F, resulting in an average trip distance of 7.34 miles per one-way trip. See Appendix G for detailed operational inputs and assumptions. While the proposed project VMT analysis (Appendix F) demonstrates a net reduction in vehicle trips and VMT compared to existing conditions for peak event conditions due to home attendees traveling shorter trip distances and by remaining on campus after school hours or walking or biking to events, this air quality analysis is conservative in evaluating trips associated with these events as new locally-occurring trips around Rio Americano High School.

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 ensure a conservative analysis, the operational mobile source emissions generated by vehicle trips as outlined above associated with new events, most of which is a conservative estimate of potential new event attendance, are compared to the SMAQMD significance thresholds, as shown in Table 5.2-2 below. Table 5.2-2 for reference.

Table 5.2-2. 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	9.8	8.2	13.6	3.5	0.02	0.005
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 5.2-2, total operational emissions would not approach or exceed any SMAQMD threshold based on the estimated trip generation rate. The stadium would continue to support existing events as indicated in Table 3-1 in Chapter 3, “Project Description,” of this EIR, such as smaller sporting events, practices, and field days. Even if these existing events were to have increased attendance and associated vehicle trips, such increase would not occur at a level that would generate additional emissions resulting in an exceedance of the SMAQMD

² Calculated based on 9 peak events (4 football games, 4 assemblies, and graduation) generating 1,295 vehicles and 4 average events generating 823 vehicles, and assuming 2 one-way trips per vehicle.

thresholds. 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 5.2-1: 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 5.2-1 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**.

Impact 5.2-3: 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 development north and northeast of the project site, and high school buildings to the west of the areas affected by the proposed project. 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 and approximately 150 feet from the nearest proposed construction improvement (e.g., proposed light masts east of each the proposed home and visitor bleachers).

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 2020a), 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 2020a). 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 well 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 G.

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 14 pounds per day of each respective criteria air pollutant modeled by the Tool, which is less than 18 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 2020a).

As shown in Table 5.2-1 and Table 5.2-2, 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 5.2-1 (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 light pole and bleacher installation, which are approximately 50 feet from the nearest student-occupied facilities (i.e., performing arts center and large gym), approximately 300 feet from the nearest classrooms, and approximately 150 feet from the nearest residents, which are adjacent to the easternmost boundary of the campus property. 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). 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 300 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 5.2-1). The maximum daily on-site exhaust PM_{2.5} emissions would be a subset of the total PM_{2.5} emissions shown in Table 5.2-1, 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 G, 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 5.2-2, 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 3.5 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 G, the maximum daily exhaust PM_{2.5} emissions are estimated to be 0.1 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 lights powered instead with electricity. 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 proposed project, the proposed project operational trip generation during intermittent peak events was estimated to be 1,295 vehicles, associated with the 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. Existing daily traffic volumes were estimated based on roadway segment counts collected on a Friday in August 2025 between the hours of 2:30 PM and 6:30 PM as part of the (see Appendix E); daily vehicle volumes along American River Drive near the intersection with Saverien Drive (located in front of Rio American High School) were estimated to be approximately 5,600 daily vehicles (i.e., average of 233 vehicles per hour). While the level of vehicles per hour at affected intersections may be higher on the day of a peak event, it would not approach 44,000 vehicles per hour with the addition of trips generated by the proposed project. Due to the relatively low traffic volumes in the vicinity of the project site, the relatively 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**.

Impact 5.2-4: 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**.

5.3 CULTURAL RESOURCES

Impact 5.3-1: 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 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 (Supernowicz 2009).

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 (JRP 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 (District) in March 2010. This 2010 recordation and evaluation found the Rio Americano High School campus ineligible for listing in the CRHR (AECOM 2010).

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.

Impact 5.3-2: 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 5.3-2: Appropriate Treatment for Inadvertent Discovery of 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 5.3-1 provides appropriate actions for inadvertent discovery of cultural resources (excluding human remains, which are addressed below). Implementation of Mitigation Measure 5.3-1 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**.

Impact 5.3-3: 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 5.3-3: Appropriate Action for Inadvertent Discovery of 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 5.3-2 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**.

5.4 ENERGY RESOURCES

Impact 5.4-1: 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 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**.

Impact 5.4-2: 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**.

5.5 GEOLOGY AND SOILS

Impact 5.5-1: 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**.

Impact 5.5-2: 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 and Elimination System (NPDES) permit program would not be required. The extent of soil disturbance during construction activities would be minor. The 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**.

Impact 5.5-3: 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.

Impact 5.5-4: 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.

Impact 5.5-5: 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.

Impact 5.5-6: 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 related to the American River Parkway, which is south of the project site, are evaluated in Section 4.1.) 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**.

5.6 GREENHOUSE GAS EMISSIONS

Impact 5.6-1: 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 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 metric tons (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 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 a resolution for the Update to the Recommended GHG Emissions Thresholds of Significance (SMAQMD 2020b), which include thresholds of significance for GHG emissions that can be used to analyze a project's compliance with applicable state laws, including AB 32, SB 32, and EO B-55-18 (SMAQMD 2020c).

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 Practices³ 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 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 2022).

As discussed above, SMAQMD considered consistency with the goal of carbon neutrality by 2045 when developing the District's GHG thresholds (SMAQMD 2020c). 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

³ 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 2020c).

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.

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 5.2, "Air Quality," of this EIR. 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 5.2-1 below. See Appendix G for detailed emissions inputs and assumptions.

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 indirect⁴ 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 5.2, "Air Quality." 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 lot⁵ 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 box.⁶

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

⁴ 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 emissions 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.

⁵ 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.

⁶ The proposed press box was modeled using the CalEEMod land use type for a High School.

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 5.2-1 below.

Table 5.6-1. 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>	18
<i>Operational Energy</i>	2
<i>Operational Refrigerants</i>	7.8E-05
Total Annual Operational Emissions	20
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 5.2-1, total construction-related and operational emissions would be well below the SMAQMD-recommended bright-line thresholds for construction and operational activities. 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 an improvement 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, most events would have lower attendance and operational mobile GHG emissions would be reduced compared to those shown in Table 5.2-1. 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)**.

5.7 HAZARDS AND HAZARDOUS MATERIALS

Impact 5.7-1: Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials Or 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 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**.

Impact 5.7-2: 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, also known as toxic air contaminant, emissions is provided in Section 5.2 of this EIR.)

Impact 5.7-3: 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**.

Impact 5.7-4: 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 3, "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 are analyzed in Section 4.3 of this EIR.)

Impact 5.7-5: 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 two-lane collector roadway with a center turn lane) and Fair Oaks Boulevard (a four-lane 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). Emergency access to the project site would not change from existing conditions, which includes multiple drive isles from American River Drive. The existing on-site circulation network, which is regulated by the California Department of Education to ensure safe pedestrian and vehicular ingress and egress, including emergency situations, would continue to be used.

Attendance at Raider Stadium for larger sporting events would increase from the existing 288-person maximum capacity to a 2,575-person maximum seating capacity. Rio Americano High School athletic sporting events that generate higher 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 event at Raider Stadium under future conditions with implementation of the proposed project, 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 road 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 with 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 was 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**.

Impact 5.7-6: 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 5.15, "Wildland Fire Hazards," for additional analyses related to wildland fire hazards, which were determined to result in no impact.)

5.8 HYDROLOGY AND WATER QUALITY

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, as measured at

the closest point, and is separated from the 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 2025a).

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. 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 to the Urban Level of Flood Protection requirements contained in the Central Valley Flood Protection Plan (DWR 2025).

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).

IMPACT ANALYSIS

Impact 5.8-1: 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 American River north 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 to 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 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 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 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 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**.

Impact 5.8-2: Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that 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**.

Impact 5.8-3: 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**.

Impact 5.8-4: 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**.

Impact 5.8-5: 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**.

5.9 LAND USE AND PLANNING

Impact 5.9-1: 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 public address 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**.

Impact 5.9-2: 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 2025b). The Arden-Arcade Community Plan land use designation is RD-4/PQP (Public/Quasi-Public) (Sacramento County 2025b). Public schools are a primary, permitted use in areas that are zoned RD-4 under the Sacramento County Zoning Code (Sacramento County 2025c:Table 3.1).

The lower American River is classified as a “Recreational” river under both the Federal and California Wild and Scenic Rivers Acts. These designations require that any project in its immediate environment protect the river’s free-flowing condition and “outstandingly remarkable” scenic and recreational values. The Urban American River Parkway Preservation Act (Public Resources Code §5840) mandates that development adjacent to the Parkway remains consistent with the American River Parkway Plan, which acts as the management plan for the federal and state Wild and Scenic Rivers Act. Under Section 4.7.3 of the Sacramento County Zoning Code, the Parkway Combining Zone (PCZ) enforces targeted restrictions on parcels bordering the river corridor. While not directly applicable to the District, it is still considered for the purposes of this evaluation of consistency with land use plans under CEQA. The primary purpose of the PCZ is to regulate unincorporated properties along the American River Parkway for consistency with the Parkway Plan and the County General Plan. A central goal is to ensure that development within and adjacent to the Parkway is designed to minimize visual intrusion to the maximum extent feasible and to complement the naturalistic amenities of the Parkway. The PCZ provides flexibility in development standards (e.g., setbacks, height, landscaping) while strictly protecting the Parkway’s aesthetic and environmental qualities. As the intent of the PCZ is to minimize effects to the Parkway from adjacent development, this EIR addresses this through evaluation under applicable resource topics throughout this EIR. The following summarizes the key section of the PCZ and how it is addressed in this EIR:

- 4.7.1. Purpose – Summarized above. Does not include policy, standards, or guidelines.
- 4.7.2. Erosion Zones – The project site is not within an Erosion Zone as identified in Section 4.7.4.E. The potential for impacts related to erosion are further discussed under Section 5.5, “Geology and Soils.”
- 4.7.3. Development Standards
 - 4.7.3.A Standards on Lots Protected by Levees (e.g., the project site is separated from the American River Parkway by an elevated levee). – Identifies building and structure height and setback requirements. As the project is improving the existing stadium and not proposing any new buildings, these standards are not directly applicable. Nonetheless, visual simulations and analysis of proposed improvements from the view of the Parkway are provided in section 4.2, “Aesthetics.”
- 4.7.4 Procedures – Details procedural requirements for those subject to the code. Not applicable to the proposed project.

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. Specific impacts and consistency issues associated with other resource and issue areas are addressed in each topic area section of this EIR, as appropriate. These topic area sections (e.g., aesthetics and visual resources, biological resources, noise, transportation) provide a detailed analysis of other relevant physical environmental effects that could result from implementation of the proposed project, and identify mitigation measures, as necessary, to reduce impacts. Implementation of the proposed project would not conflict with applicable land use plans, policies, or regulations, and therefore would not generate any adverse physical impacts beyond those identified and addressed in detail in the environmental topic area sections of this EIR. Therefore, this impact would be **less than significant**.

5.10 MINERAL RESOURCES

Impact 5.10-1: 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**.

Impact 5.10-2: 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**.

5.11 POPULATION AND HOUSING

Impact 5.11-1: 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**.

Impact 5.11-2: 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**.

5.12 PUBLIC SERVICES

Impact 5.12-1: 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 permanent lighting, an upgraded public address 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 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 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 District's existing facility-use procedures, including scheduling, supervision, and community-use protocols outlined in the District Board Policy Manual (San Juan Unified School District 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 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**.

5.13 RECREATION

Impact 5.13-1: 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. Furthermore, Rio Americano High School would no longer have a need to use the El Camino High School Stadium, and thus there would be no use of existing off-site recreational facilities such that substantial physical deterioration of the off-site facility would be accelerated; this would represent a beneficial impact as compared to existing conditions. 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**.

Impact 5.13-2: 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, and additional bleacher seating sufficient to accommodate whole-school events is included as part of the proposed project.

The existing track and field includes limited seating (up to 288 people), a public address system, and portable diesel-powered lights, all of which support existing sports practices, games and other school assembly events during the daytime and evening/nighttime hours. The proposed project would result in permanent lighting on taller poles, increased seating, and an improved public address system, which would accommodate the larger varsity football games five to eight times per year, and possibly graduation, additional whole-school assemblies, and community events, as well as increased flexibility in the timing games and practices for other sports due to improved lighting. The adjacent American River Parkway is closed to public use after dark. Furthermore, the high school campus property (including the existing stadium) is separated from the Parkway by the American River north flood control levee, which is elevated approximately 10 feet above the Parkway and the Jedediah Smith

Memorial Trail. Visual impacts, including visual impacts related to the American River Parkway, are addressed in Draft EIR Section 4.1, “Aesthetics.” The American River Parkway is closed after dark; since there would be no recreationists in the Parkway when nighttime stadium events are occurring, there would be no impacts to recreationists within the Parkway from the proposed nighttime lighting. Because the Jedediah Smith Memorial Trail is within the Parkway on the south side of the American River north flood control levee, and Raider Stadium event parking would be situated within the existing school campus parking lots and there is no vehicle access to the levee or Parkway from Rio Americano High School or the surrounding neighborhood and existing access to the Parkway would not change as a result of the proposed project, there is no potential for conflicts between event parking or school event traffic and recreationists within the Parkway. The Parkway has no motor vehicle access and motor vehicle use within the Parkway is prohibited. Therefore, the proposed project would have no impact on recreationists within the Parkway.

The physical environmental impacts associated with construction and operation of the proposed project are evaluated throughout all of the topic areas in this EIR. There is no impact of the project related to recreational facilities outside of the environmental topic-specific issues evaluated in this EIR. Therefore, this impact would be **less than significant**.

5.14 UTILITIES AND SERVICE SYSTEMS

Impact 5.14-1: 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 Section 5.8, “Hydrology and Water Quality,” of this EIR.

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 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 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 development, school capacity, or any other components that could 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**.

Impact 5.14-2: 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 (SSWD 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**.

Impact 5.14-3: 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 development or 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**.

Impact 5.14-4: 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 would primarily enable the shifting of activities that occur under existing conditions, and therefore would not substantially increase solid-waste generation. Construction and event-related waste would be temporary and limited in scale relative to existing District operations. Operational waste would continue to be collected and processed through the District's existing solid-waste and recycling service provider in compliance with applicable state and local regulations. The project would adhere to the 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**.

Impact 5.14-5: 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 from 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 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**.

5.15 WILDLAND FIRE HAZARDS

If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:

Impact 5.15-1: 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. In 2024, CAL FIRE updated its mapping for certain “local responsibility areas” (LRAs), which are under the jurisdiction of local entities (e.g., cities, counties), to also include moderate, high, and very high wildfire hazard ratings.

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). Furthermore, although Sacramento Metropolitan Fire District has adopted local fire hazard severity zones within its service area, no fire hazard zones have been identified at the project site or in the project vicinity (Sacramento Metropolitan Fire District 2025). Therefore, the project would have no impact. (See Section 5.7, “Hazards and Hazardous Materials,” Impact 5.7-6, for a detailed analysis related to emergency evacuation planning.)

Impact 5.15-2: 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.

Impact 5.15-3: 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**.

Impact 5.15-4: 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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6 ALTERNATIVES

6.1 INTRODUCTION

CEQA requires the consideration and analysis of potentially feasible alternatives to a proposed project. Because an EIR must identify ways to mitigate or avoid the significant effects that a project may have on the environment (Public Resources Code Section 21002.1), the discussion of alternatives must focus on alternatives to the project or its location which are capable of avoiding or substantially lessening any significant effects of the project, even if these alternatives would impede to some degree the attainment of the project objectives, or would be more costly (CEQA Guidelines Section 15126.6[b]).

The EIR must include a “range of reasonable alternatives,” which “shall include those that could feasibly accomplish most of the basic purposes of the project and could avoid or substantially lessen one or more of the project’s significant impacts” (CEQA Guidelines Sections 15126.6[a] and 15126.6[c]). In addition, a “no project” alternative must be considered (CEQA Guidelines Section 15126.6[e]).

Section 15126.6(a) of the CEQA Guidelines requires that an EIR describe:

“...a range of reasonable alternatives to the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives. An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision making and public participation. An EIR is not required to consider alternatives which are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. There is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.”

In defining “feasibility,” CEQA Guidelines Section 15126.6(f)(1) states, in part:

“Among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries (projects with a regionally significant impact should consider the regional context), and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site (or the site is already owned by the proponent). No one of these factors establishes a fixed limit on the scope of reasonable alternatives.”

Each alternative in this chapter was evaluated according to the “rule of reason” and general feasibility criteria suggested by the CEQA Guidelines Section 15126.6, as follows:

The range of alternatives required in an EIR is governed by a ‘rule of reason’ that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the lead

agency determines could feasibly attain most of the basic objectives of the project. The range of feasible alternatives shall be selected and discussed in a manner to foster meaningful public participation and informed decision making.

The inclusion of an alternative in an EIR does not necessarily mean the alternative is feasible. Rather, the inclusion of an alternative in an EIR indicates that lead agency staff has determined that the alternative is *potentially* feasible.

The CEQA Guidelines Section 15126.6(d) provide guidance as to how alternatives should be evaluated:

The EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the proposed project. A matrix displaying the major characteristics and significant environmental effects of each alternative may be used to summarize the comparison. If an alternative would cause one or more significant effects in addition to those that would be caused by the project as proposed, the significant effects of the alternative shall be discussed, but in less detail than the significant effects of the project as proposed.

This chapter describes alternatives to the proposed project and provides an evaluation comparing impacts of the alternatives to the impacts of the proposed project is included. The following impact discussions are presented in either a qualitative or a quantitative manner depending on resource topic, and are generally briefer than those found in the project chapters, consistent with the CEQA Guidelines Section 15126.6(d). This chapter does not repeat background discussions or other subject matter, which has already been described in the topical chapters of this EIR, but focuses on those alternative impacts which are substantively different than the impacts described for the project. Reviewers are encouraged to read the topical chapters describing project impacts prior to reading the Alternatives chapter for additional background and context that precede this chapter (i.e., Sections 4.1 through 4.5, and Chapter 5).

6.2 SELECTION OF ALTERNATIVES

6.2.1 CRITERIA

Alternatives were selected for evaluation in this EIR based on criteria in the CEQA Guidelines Section 15126.6. These criteria include: (1) ability of the alternative to attain most of the basic project objectives; (2) feasibility of the alternative; and (3) ability of the alternative to avoid or substantially reduce one or more significant environmental effects of the proposed project.

The District has evaluated potential alternatives relative to the objectives of the proposed project. For the purpose of alternatives analysis under CEQA, project objectives may not be defined so narrowly that the range of alternatives is unduly constrained. Alternatives that would impede to some degree the attainment of the project objectives or would be more costly may also be considered.

6.2.2 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.

6.3 ALTERNATIVES CONSIDERED BUT REJECTED AS INFEASIBLE

Pursuant to CEQA Guidelines Section 15126.6(c), the alternatives that were considered but rejected as infeasible are briefly discussed below. An alternative may be considered but not carried forward for various reasons, such as not meeting the objective(s) of the project; not being feasible; conditions outside the control of the project applicant (e.g., land ownership, right-of-way acquisition); or other constraints.

6.3.1 OFF-CAMPUS PROJECT LOCATION – NEW STADIUM WITH LIGHTING

Establishing a new stadium at a different off-campus location with installed lighting is unlikely to reduce significant effects of the project to a less-than-significant level unless it were located far from existing residential development and could avoid significant noise and lighting effects. However, locating a new stadium at a distance from existing Rio Americano High School student residences would also have the effect of increasing travel distances to the stadium and associated criteria air pollutant and greenhouse gas emissions. Adding permanent lighting to the existing Raider Stadium can be done within the existing facility footprint. Developing an entirely new site on a different property could result in new or more severe significant impacts than have been identified for the proposed project, such as substantial (adverse) changes in visual character; loss of special-status plants, wildlife, or habitat; damage or destruction of archaeological, Native American Tribal resources, or unique paleontological resources; hydrology and water quality (in areas where no existing stormwater drainage system is present); substantial new noise impacts; and substantial new transportation impacts. The school district would also need to obtain control of a new site that is of sufficient size to accommodate a new stadium. In addition, if a new site is not available within a reasonable distance of Rio Americano High School and its enrolled population, most of the project objectives would not be attained. Therefore, this alternative was considered, but ultimately was rejected for detailed examination in this EIR.

6.3.2 RESCHEDULING TO MORNING HOURS

This alternative would reschedule practices and games to the morning hours instead of holding nighttime practices and games, which would eliminate the need for permanent nighttime lighting at the existing Raider Stadium. Although it might be possible to schedule some practices during the morning hours in the spring and fall, sunrise occurs after 7:00 A.M. during the winter months, which may not provide adequate time for practices before the start of classes. In addition, this alternative would not accommodate weekday games, because mornings would not provide the several hours of time required and would conflict with the school and work schedules of participants and most attendees. Therefore, this alternative was considered, but was rejected for detailed examination in this EIR.

6.3.3 USE ALTERNATE EXISTING STADIUMS

Under this alternative, the District would arrange for the use of another facility for practices and games that cannot be accommodated between the end of classes and sundown. Two existing lighted stadiums have been identified:

- ▶ **Hornet Stadium.** This facility is located at 6000 Jed Smith Drive, Sacramento, at California State University, Sacramento. Hornet Stadium is approximately 4.7 miles (driving distance) from Rio Americano High School. The stadium is surrounded by campus facilities and commercial land uses. The nearest residence is approximately 1,000 feet to the west.
- ▶ **Hughes Stadium.** This facility is located at 3835 Freeport Boulevard, Sacramento, at Sacramento City College. Hughes Stadium is approximately 10 miles (driving distance) from Rio Americano High School. The stadium is surrounded by campus facilities and commercial land uses. The nearest residence is approximately 500 feet to the south.

However, under existing conditions, Rio Americano High School currently holds nighttime games at the El Camino High School Stadium, which is approximately 3 miles to the north (along the transportation network, not “as the crow flies”), and is equipped with high-mast lighting for nighttime games. The El Camino High School Stadium has a capacity to host up to 3,000 people. Holding future nighttime games at a different lighted stadium (i.e., Hornet or Hughes) would be similar to existing conditions, and therefore would not reduce the project’s environmental impacts in a way that would be different from the No Project Alternative evaluated in detail below. Furthermore, holding nighttime games at Hughes Stadium would result in increased generation of greenhouse gases due to the longer average travel distance for participants and attendees. Finally, the District does not have control over these facilities or their scheduling for Rio Americano High School events. Therefore, this alternative was considered, but was rejected for detailed examination in this EIR.

6.4 ALTERNATIVES CONSIDERED IN DETAIL IN THIS EIR

6.4.1 ALTERNATIVE 1: NO PROJECT ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) states that a discussion of the “No Project” alternative must consider “what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans.”

Under the No Project Alternative, the proposed project would not be constructed. Permanent high-mast stadium lights, new lighting for pedestrian pathways from the main campus parking lot to the stadium, new and expanded bleacher seating, an upgraded public address system, and a new press box would not be installed, and athletic activities would continue to occur as they are presently, as described in Chapter 3, “Project Description.” Generally, this means that sports practices and games would occur regularly throughout the respective seasons, including evening and nighttime practices and games with use of existing diesel-powered lights. Temporary, portable lighting has been used in the past (i.e., 11.7-horsepower diesel-powered light-emitting diode [LED] light towers) and would continue to be used in the future. Under the No Project Alternative, as with existing conditions, Rio Americano High School would continue to use the El Camino High School Stadium approximately 3 miles to the north, which is equipped with high-mast lighting for nighttime games. This alternative would not meet any of the project objectives.

6.4.2 ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Rio Americano High School was originally constructed in 1963, and the track/football field, along with the adjacent baseball, softball, and soccer fields on the campus to the north, have existed in their current locations since 1963. Bleacher seating and small upgrades at the stadium were installed in 2006, and substantial improvements to the stadium were completed in 2019.

In consideration of comments on the Notice of Preparation regarding potentially feasible alternatives, Alternative 2 considers an alternate on-site location for Raider Stadium, specifically to the north toward American River Drive and further from the American River Parkway (Parkway). Under Alternative 2, the existing Raider Stadium would be demolished and rebuilt at the northeastern end of the campus adjacent to and south of American River Drive, with the same proposed high-mast lighting, new and expanded bleacher seating, new press box, and upgraded public address system. The stadium would be the same size and would have the same facilities (i.e., an eight-lane synthetic track, turf grass football field, scoreboard, and shot put, discus, long jump, high jump, and pole vault areas). In addition, the existing baseball and soccer fields would be moved to the south, where the stadium is presently located. In order to accommodate Raider Stadium at this new location, a portion of the main campus parking area, where solar panels are currently mounted on a shade structure, would be relocated to the south. As with the proposed project, pedestrian pathway lighting from the relocated parking area to the new stadium would be required. To provide a noise and visual buffer for the residents to the north and east, a 100-foot-wide landscape area consisting primarily of fast-growing evergreen trees specifically designed to provide an acoustical reduction of 5 to 8 A-weighted decibels (dBA), would be installed along the campus property boundary north and east of the new stadium (i.e., along American River Drive east of the main campus parking area, and along the eastern campus property boundary). The existing line of tall trees along the campus’ southern boundary (adjacent to the current Raider Stadium) would be retained.

Currently, the southern edge of the existing Raider Stadium is approximately 125 feet from the American River Parkway, and is further separated from the Parkway by the elevated U.S. Army Corps of Engineers’ north bank American River flood control levee. Under Alternative 2, Raider Stadium would be situated farther north, approximately 875 feet from the American River Parkway. The baseball and soccer fields that would be relocated to the southern part of the campus would not be lit at night.

This alternative would meet all the project objectives.

6.5 ALTERNATIVES ANALYSIS

As discussed in detail in Chapter 5, there would be no impacts from the proposed project related to the following topic areas: agricultural and forestry resources, mineral resources, population and housing, public services, and wildland fire hazards. There would also be no impacts related to these topic areas under Alternatives 1 and 2. Therefore, these topic areas are not discussed in the alternatives analysis.

6.5.1 AESTHETICS

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

With regard to changes in visual character, the proposed project would have a less-than-significant impact and would not conflict with any applicable regulations governing scenic quality. Under Alternative 1, the existing developed high school campus would be unchanged. Partially obscured views of construction staging available from along American River Drive would not be temporarily altered under Alternative 1. Since the construction staging areas are not visible from the American River Parkway due to the intervening levee, the visual character during construction would be the same under both the proposed project and Alternative 1, with the exception of a few days when a crane may be used to install the lighting standards under the proposed project. Under Alternative 1, the upper 70 to 80 feet of the four light poles and luminaires and pedestrian safety lighting between the field and parking areas on the northern portion of the project site that would be visible under the proposed project would not be present under Alternative 1. From the American River Parkway, while the pedestrian safety lighting and bleachers included as a part of the project would not be visible, and therefore, the visual character would be the same under Alternative 1 as under the proposed project, under Alternative 1, the light poles and luminaires that would be intermittently visible (through the row of on-campus trees) under the proposed project would not be visible to recreationists looking upwards and northwards from the Parkway under Alternative 1. From American River Drive and Overall, the impact related to a change in visual character would be **slightly reduced** under Alternative 1 compared with the proposed project.

With regard to conflicts with standards governing aesthetics, under the proposed project, there would be no conflicts since public schools are a primary allowable use under the Sacramento County Zoning Code, since nighttime lighting would be allowed with a conditional use permit if the County had jurisdiction over the proposed project, and since the American River Parkway in this area is designated as “Limited Recreation” and is closed to the public after sundown. Therefore, Alternative 1 would not alleviate any conflict with aesthetic regulations that would occur under the proposed project, and the impact under Alternative 1 would be **the same** as under the proposed project.

For lighting and glare impacts, the proposed project would use technology that would avoid light trespass and minimize glare. With implementation of Mitigation Measure 4.1-2, the proposed project lighting design would be reviewed through the International Dark-Sky Association and would be required to achieve a PASS rating or redesigned until such a rating is achieved, prior to construction. The impact under the proposed project would be less than significant with mitigation. Under Alternative 1, use of the existing lighting would continue for evening practices and competitions would continue – lighting that is lower in height and directed outward, rather than directed downward at the field of play. Since existing lighting used at the campus is mounted at a lower height, this lighting is visible to fewer public viewing areas compared to lighting mounted at greater heights. Under the proposed project, while the lighting technology would avoid light spillage and glare, it would be visible in more

public viewing areas compared to the existing on-site lighting, and would be used for five to eight additional evenings of varsity football. The primary public viewpoints of the project site are from American River Drive, and from the Jedediah Smith Memorial Trail and the paved access road along the crown of the north bank American River flood protection levee. Alternative 1 would reduce the viewpoints from which the lighting would be visible compared to the proposed project. However, from locations where the temporary on-site lighting is directed, the proposed project would reduce light trespass and glare as compared with Alternative 1. Additionally, under Alternative 1, the District would not use the two ball trackers – the tiny, highly controlled portion of the system that is optimized to project a low-intensity, glare-free beam specifically upward to illuminate the underside of an aerial ball and only targets the path of the ball. Since the current lighting of the track and field area is not directional and does result in some light spillage outside of the Rio Americano High School boundary, and since the focus of the lighting impact is on light trespass and glare, rather than the mere visibility of light from public viewpoints, the impact under Alternative 1 would be **slightly greater** than under the proposed project.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Under Alternative 2, the partially obscured views of construction staging available from along American River Drive would be more visible, and construction activity would be more visible from public viewpoints along American River Drive. Since the construction staging areas are not visible from the American River Parkway due to the intervening levee, the visual character during construction would be the same under both the proposed project and Alternative 2, with the exception of a few days when a crane may be used to install the lighting standards. With the proposed project, the top portion of the four proposed light poles and luminaires would be visible from the American River Parkway, and the visibility of these features would be reduced under Alternative 2 since the lighting standards would be moved north and away from this public viewpoint. Under the proposed project, the light poles and luminaires would be intermittently visible (through the row of on-campus trees) from American River Drive, but under Alternative 2, these features would be much more visible, along with the bleachers, press box, and other features of a reconstructed stadium on the northeastern portion of the high school campus. From the American River Parkway, the pedestrian safety lighting and bleachers included as a part of the project would not be visible, and these features would also not be visible under Alternative 2. Overall, the impact related to a change in visual character would be **greater** under Alternative 2 compared with the proposed project.

With regard to conflicts with standards governing aesthetics, neither the proposed project nor Alternative 2 would have any conflict with aesthetic regulations. The impact would be **the same** as under the proposed project.

For lighting and glare impacts, the proposed project would be designed to avoid light trespass and glare, and Mitigation Measure 4.1-2 would require the proposed project to be designed to the standards of and to achieve a DarkSky “pass” rating for the backlight, uplight, and glare analysis. Under Alternative 2, the same lighting technology would be used to ensure that the field of play is lit and that there is no glare or light trespass, and Mitigation Measure 4.1-2 would be applicable to Alternative 2. The sports lighting would be located closer to American River Parkway and relatively more visible from this public viewing location compared to the visibility of lighting under the proposed project. From the Jedediah Smith Memorial Trail and the paved access road along the crown of the north bank American River flood protection levee, there would be no glare or light trespass under the proposed project, but the lighting would be visible. Under Alternative 2, the lighting would be visible from the paved access road along the crown of the north bank American River flood protection levee, but not from Jedediah Smith Memorial Trail, which would be closed at sundown. Since the focus of the lighting impact is

on light trespass and glare, rather than the mere visibility of light from public viewpoints, the impact under Alternative 2 would be **the same** as under the proposed project.

6.5.2 AIR QUALITY

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Because there would be no new construction, there would be no potential for conflicts with implementation of the applicable air quality plan, no increase in emissions of criteria pollutants, no potential exposure to toxic air contaminants, and no odor emissions related to construction. Therefore, Alternative 1 would result in a **reduced** level of construction-related impact compared with the proposed project.

Operations under Alternative 1 would include continued use of the existing Raider Stadium for practices and games, and varsity football games and graduation would continue to be held off-site, such as at El Camino High School for football, consistent with existing conditions. Under Alternative 1, the use of diesel-powered portable lights would continue to be used on-site to support evening activities, generating diesel particulate matter and criteria air pollutant emissions. Furthermore, the regional game day vehicle miles traveled (VMT) benefit achieved under the proposed project would not occur under Alternative 1, resulting in increased mobile source emissions under the proposed project for these events compared to the proposed project. Therefore, Alternative 1 would result in a **slightly greater** long-term impact associated with regional air quality compared to the proposed project.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Alternative 2 would involve a substantially greater amount of construction over a larger area, and therefore would result in a greater level of construction-related emissions compared to the proposed project. Long-term operational emissions sources under Alternative 2 would be the same as the proposed project. Therefore, while long-term operational impacts associated with air quality would be **the same** as under the proposed project, Alternative 2 would result in a **greater** potential level of construction-related impacts from conflicts with implementation of the applicable air quality plan, emissions of criteria pollutants, potential exposure to toxic air contaminants, and odor emissions.

6.5.3 BIOLOGICAL RESOURCES

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Because there would be no new construction and no potential increase in the number of attendees at Raider Stadium sporting events, there would be no potential for direct impacts to biological resources (e.g., special-status species, native oaks) from the use of heavy equipment during construction activities or increase in operational lighting or noise levels with the potential to disturb sensitive biological resources (e.g., nesting birds). Therefore, Alternative 1 would result in a **reduced** level of impact compared to the proposed project.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Alternative 2 would involve a substantially greater amount of construction over a larger area and longer duration and therefore would result in a greater potential level of construction-related disturbance to sensitive biological resources in neighboring habitats (e.g., nesting birds) or direct impacts to biological resources from the use of

heavy equipment on the school campus. Mitigation Measures 4.2-1a through 4.2-1e identified for the proposed project would also be applicable to Alternative 2. Due to the expanded area of construction, construction related impacts would be **greater** under Alternative 2 compared to the proposed project. There would be no change in operational lighting impacts under Alternative 2 because, like the proposed project, there would be no light trespass into sensitive habitat in the Parkway and would only impact developed areas on the school campus. There would be a reduced level of operational noise impacts because noise levels from stadium events would be unlikely to increase noise levels in the nearest suitable habitat for special-status species in the Parkway. Operational impacts under the proposed project would be less than significant, and would be **similar** under the proposed project.

6.5.4 CULTURAL RESOURCES

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

No archaeological resources or human remains have been identified at the project site, which was developed as a school in 1963, and due to the limited nature of project-related excavation and the fact that the project site has been previously disturbed, the probability of encountering significant archaeological resources as defined by CEQA Guidelines Section 15064.5 or human remains under the proposed project is low. However, because Alternative 1 would involve no ground-disturbing activities of any kind, it would result in a **reduced** level of impact compared to the proposed project.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

No archaeological resources or human remains have been identified at the project site, and due to the limited nature of project-related excavation and the fact that the project site has been previously disturbed for urban development, the probability of encountering significant archaeological resources as defined by CEQA Guidelines Section 15064.5 or human remains under the proposed project is low. However, because Alternative 2 would involve a larger amount of earthmoving activities over a larger area, it would result in a **greater** potential for impacts compared to the proposed project.

6.5.5 ENERGY

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Because there would be no new construction under Alternative 1, there would be no potential effect on energy resources or energy conservation and construction-related energy use under Alternative 1 would result in a **reduced** level of impact compared to the proposed project.

Operations under Alternative 1 would include continued use of the existing Raider Stadium for practices and games, and varsity football games would continue to be held off-site, such as at El Camino High School, consistent with existing conditions. Under Alternative 1, the use of diesel-powered portable lights would continue to be used on-site to support evening activities, relying on diesel fuel rather than electricity that is sourced, in part, from renewable energy sources. Furthermore, the regional game day VMT benefit achieved under the proposed project would not occur under Alternative 1, resulting in increased passenger vehicle travel, which is primarily fueled by gasoline, although some vehicles may be electric-powered or diesel-fueled. Therefore, Alternative 1

would result in a **slightly greater** long-term impact associated with energy resources compared to the proposed project.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Alternative 2 would result in a similar level of energy use during operation, but a substantial increase in the use of energy resources during construction. Therefore, Alternative 2 construction would result in a **greater** level of impact compared to the proposed project. Long-term operations under Alternative 2 would include similar energy resources requirements in terms of vehicle fuel and electrical power as the proposed project. Therefore, Alternative 2 operations would result in **the same** level of impact compared to the proposed project.

6.5.6 GEOLOGY AND SOILS

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Because Alternative 1 would not involve the operation of any new facilities and would not result in an increase in the number of attendees at on-site sports events, the number of people who could be exposed to potential hazards from strong seismic ground shaking would be **reduced** compared to the proposed project. Because Alternative 1 would involve no ground-disturbing activities of any kind, it would result in a **reduced** level of impact from construction-related soil erosion compared to the proposed project.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Alternative 2 would include the same facilities as the proposed project, with the same proposed increase in the number of attendees at on-site sports events. Therefore, the number of people who could be exposed to potential hazards from strong seismic ground shaking would be **similar** to the proposed project. Alternative 2 would involve a substantially greater amount of construction over a larger area, and therefore would result in a **greater** potential level of impact from construction-related soil erosion than the proposed project.

6.5.7 GREENHOUSE GAS EMISSIONS

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

The proposed project's greenhouse gas (GHG) emissions would be minimal, and would not exceed Sacramento Metropolitan Air Quality Management District (SMAQMD) thresholds. Because Alternative 1 would involve no construction activities, the amount of GHG emissions for construction would be reduced, and Alternative 1 would result in a **reduced** level of construction-related impact compared with the proposed project.

Operations under Alternative 1 would include continued use of the existing Raider Stadium for practices and games, and varsity football games would continue to be held off-site, such as at El Camino High School, consistent with existing conditions. Under Alternative 1, the use of diesel-powered portable lights would continue to be used on-site to support evening activities, generating GHG emissions. Furthermore, the regional gameday VMT benefit achieved under the proposed project would not occur under Alternative 1, resulting in increased mobile source GHG emissions under the proposed project for these events compared to the proposed project. Therefore, Alternative 1 would result in a **slightly greater** long-term impact associated with GHG emissions compared to the proposed project.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Alternative 2 would include the same facilities as the proposed project, with the same amount of GHG emissions during project operation as compared to the proposed project. However, Alternative 2 would involve a substantially greater amount of construction over a larger area. While the level of construction under Alternative 2 is not anticipated to result in a substantial level of GHG emissions, they would be increased compared to the proposed project. Overall, under Alternative 2, GHG emissions would increase, resulting in a **greater** level of impact compared to the proposed project.

6.5.8 HAZARDS AND HAZARDOUS MATERIALS

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Because Alternative 1 would not involve any construction activities, there would be no potential hazards from the routine transport, use, or disposal of hazardous materials or accidental release of hazardous materials. There would also be no potential impact from use or emission of hazardous materials within one-quarter mile of a school, or for potential safety hazards within two miles of an airport. Finally, since the attendance at events at the existing Raider Stadium would not increase under Alternative 1, there would be no potential for increased need for evacuation of additional people during an emergency situation. Therefore, impacts from hazards and hazardous materials would be **reduced** under Alternative 1 compared to the proposed project.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Because Alternative 2 would result in a greater amount of construction over a larger area, there would be an increase in the potential hazards from the routine transport, use, or disposal of hazardous materials or accidental release of hazardous materials. There would also be an increase in the potential impact from use or emission of hazardous materials within one-quarter mile of a school. Therefore, Alternative 2 would result in a **greater** potential level of impact compared to the proposed project.

Alternative 2 would include the same facilities as the proposed project, with the same proposed increase in the number of attendees at Raider Stadium sports events. Therefore, Alternative 2 would result in **similar** potential impacts from potential safety hazards within an airport land use plan, and from the increased need for evacuation of additional people during an emergency situation.

6.5.9 HYDROLOGY AND WATER QUALITY

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Alternative 1 would not involve any construction activities and no new facility operations. Thus, there would be no potential to violate water quality standards or conflict with the Basin Plan, no potential to interfere with groundwater recharge from new impervious surfaces or conflict with the North American Subbasin Groundwater Sustainability Plan, and no potential to increase the amount of stormwater runoff from new impervious surfaces potentially resulting in flooding. The proposed project's hydrology and water quality impacts would be minimal; nevertheless, Alternative 1 would result in a **reduced** level of impact compared to the proposed project.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Alternative 2 would result in a substantially greater amount of construction and earthwork over a larger area, and therefore would result in a **greater** potential for impacts related to violation of water quality standards or conflicts with the Basin Plan from erosion and transport of sediment and other potential pollutants during earthmoving activities.

Because Alternative 2 would result in operation of the same size facilities at the same intensities as the proposed project, Alternative 2 would result in a **similar** potential as the proposed project to interfere with groundwater recharge from new impervious surfaces or conflict with the North American Subbasin Groundwater Sustainability Plan.

Implementing the limited suite of improvements associated with the proposed project would result in no impact related to stormwater drainage since the existing system in the existing location would continue to be used. However, reconstructing the stadium in a different on-campus location under Alternative 2 would result in the need to change the existing on-site stormwater drainage system to accommodate the runoff from the impervious surfaces in a different location, and to ensure that runoff in the new location would not result in flooding. Therefore, Alternative 2 would result in a **greater** level of impact compared to the proposed project.

6.5.10 LAND USE AND PLANNING

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Under Alternative 1, the proposed improvements to Raider Stadium would not be implemented. Like the proposed project, Alternative 1 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. Therefore, Alternative 1 would have no impact regarding physically dividing an established community, which would be **the same** level of impact as the proposed project.

Under Alternative 1, existing athletics and other school events would continue to occur at the existing Raider Stadium, including some evening events through the use of diesel-powered portable lights. 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). Public schools are a primary, permitted use in areas that are zoned RD-4 under the Sacramento County Zoning Code (Sacramento County 2025b:Table 3.1). Under Section 4.7.3 of the Sacramento County Zoning Code, the Parkway Combining Zone (PCZ) enforces targeted restrictions on parcels bordering the river corridor. As the intent of the PCZ is to minimize effects to the Parkway from adjacent development, this EIR addresses this through evaluation under applicable resource topics throughout this EIR. Because Alternative 1 proposes no change from existing conditions and 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, Alternative 1 would result in **the same** level of impact.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Alternative 2 would result in operation of the same size facilities within the existing Rio Americano High School campus at the same intensities as the proposed project, but in an alternate configuration within the northeastern portion of campus and shifting other existing baseball fields to the southeastern portion of the campus. Like the proposed project, Alternative 2 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. Therefore, Alternative 2 would have no impact regarding physically dividing an established community, which would be **the same** level of impact as the proposed project.

The project site is the same as that of the proposed project and therefore under the same zoning. This EIR addresses any potential physical environmental effects associated with land use and planning through evaluation under applicable resource topics throughout this EIR. As with the proposed project, under Alternative 2, 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, Alternative 2 would result in **the same** level of impact.

6.5.11 NOISE AND VIBRATION

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Under Alternative 1, the proposed project improvements would not be constructed. Alternative 1 would avoid construction noise and construction vibration associated with the proposed project. Existing athletic activities would continue to occur as they do under current conditions, including use of existing portable diesel-powered lights for some evening activities and continued use of the existing public address system. Because Alternative 1 would not increase stadium seating capacity, would not introduce a modernized public address system, and would not enable additional or expanded nighttime stadium events at Rio Americano High School, it would avoid the proposed project's significant and unavoidable operational stadium event noise impact. Therefore, Alternative 1 would result in a **reduced** level of noise and vibration impact compared to the proposed project.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Construction noise and vibration impacts under Alternative 2 would be greater than the proposed project because this alternative would require demolition of the existing stadium, reconstruction of a new stadium, relocation of athletic fields, relocation of a portion of the parking area and solar shade structures, utility modifications, and installation of a landscape buffer. These activities would involve a larger construction area, longer construction duration, and more intensive construction activity than the proposed project. Therefore, Alternative 2 would result in a **greater** construction noise and vibration impact than the proposed project.

Because Alternative 2 would include the same type and intensity of stadium facilities and would allow the same level of athletic and non-athletic event activity as the proposed project, operational stadium event noise from crowds, bleachers, band activity, and the public address system would be similar in character to the proposed project. However, the relocated stadium would be farther from the American River Parkway and closer to residences along American River Drive. The proposed 100-foot-wide landscape buffer along the northern and eastern campus boundaries would provide some noise reduction, but would not fully eliminate crowd, bleacher,

band, and public address-related event noise. The typical noise environment would be unchanged from existing conditions because, most of the time, there would not be high noise-generating activities (e.g., football games and similar events with large crowds, public address system, and related noise sources) going on at the facilities. The existing noise environment in the vicinity of the project site is defined by traffic noise along American River Drive and other project-area streets. However, when there are events and activities, the shifting of Raider Stadium to the north would increase intermittent noise exposure associated with practices, competitions, and other events hosted at Rio Americano High School, resulting in a slightly increased level of operational noise impact at surrounding residential receptors. Therefore, operational noise impacts under Alternative 2 would be **slightly greater compared** to the proposed project.

6.5.12 RECREATION

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Under Alternative 1, the proposed improvements to Raider Stadium would not be implemented. Therefore, Rio Americano High School would continue to use the El Camino High School Stadium, approximately 3 miles to the north, which is equipped with high-mast lighting for nighttime games. Therefore, Alternative 1 would result in increased the use of existing off-site recreational facilities compared to the proposed project, but not at a level that would be anticipated to result in substantially accelerated physical deterioration of the off-site facility. Furthermore, Alternative 1 would not provide for improvements to the existing Raider Stadium facility. Therefore, Alternative 1 would result in a **greater** level of impact compared to the proposed project.

The proposed project involves improvements to the existing Rio Americano High School stadium. Under Alternative 1, because the proposed improvements to Raider Stadium would not be implemented, there would be no potential for other physical environmental impacts associated with construction or operation. Therefore, Alternative 1 would result in a **reduced** level of impact.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Alternative 2 would result in operation of the same size facilities at the same intensities as the proposed project. As with the proposed project, under Alternative 2, Rio Americano High School would no longer have a need to use the El Camino High School Stadium, and thus there would be no use of existing off-site recreational facilities such that substantial physical deterioration of the off-site facility would be accelerated, resulting in a **similar** level of impact.

Currently, the existing Raider Stadium is approximately 125 feet from the American River Parkway, and is separated from the Parkway by the U.S. Army Corps of Engineers' north bank American River flood control levee, which is elevated approximately 10 feet above the Parkway. Under Alternative 2, Raider Stadium would be situated farther north on the Rio Americano High School campus, approximately 875 feet from the American River Parkway. However, the only recreational facility within the Parkway in the project vicinity is the Jedediah Smith Memorial Trail, and the Parkway is closed to all public and private use after dark. Therefore, as with the proposed project, Alternative 2 would have no impact on recreation within the Parkway, and would result in the **same** level of impact as the proposed project.

Although Alternative 2 would involve a greater amount of construction over a larger area, like the proposed project, there would not be an increased potential for other physical environmental impacts associated with

construction or expansion of recreational facilities that might have an adverse physical effect on the environment not evaluated throughout all of the resource-specific sections within this alternatives analysis. Therefore, Alternative 2 would result in **the same** level of impact as the proposed project.

6.5.13 TRANSPORTATION AND CIRCULATION

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Because Alternative 1 would involve no construction activities, there would be no construction-related vehicle trips or temporary effects on circulation or emergency access. Therefore, construction-related transportation impacts under Alternative 1 would be **reduced** compared to the proposed project.

Under Alternative 1, varsity home football games would continue to be held at El Camino High School. Therefore, Alternative 1 would not result in the increased event-related parking demand, pedestrian and bicycle activity, vehicle circulation, queuing, or emergency-access effects at Rio Americano High School identified for the proposed project. Localized operational transportation impacts would therefore be reduced compared to the proposed project. However, as discussed in Section 4.4, “Transportation and Circulation,” relocating varsity home football games from El Camino High School to Rio Americano High School under the proposed project would reduce regional game day VMT. Under Alternative 1, varsity home football games would continue to be held at El Camino High School, and this VMT reduction would not occur. Therefore, impacts related to VMT would be greater under Alternative 1 compared to the proposed project. Because Alternative 1 would avoid the construction-related and localized operational transportation effects of the proposed project, overall, Alternative 1 would result in a **reduced** level of transportation and circulation impact compared to the proposed project, although it would not achieve the proposed project’s reduction in regional game day VMT.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Alternative 2 would involve a substantially greater amount of construction over a larger area and longer duration than the proposed project. Therefore, temporary construction-related transportation impacts under Alternative 2 would be **greater** than under the proposed project.

Alternative 2 would accommodate the same general level of athletic and non-athletic event activity as the proposed project at the existing Raider Stadium, just at a shifted location within the sports fields area. Therefore, event-related vehicle trips, parking demand, pedestrian and bicycle activity, vehicle queuing, emergency-access conditions, and regional gameday VMT would generally be **the same** as under the proposed project. Although relocation of the stadium and a portion of the campus parking area would alter internal pedestrian and vehicle circulation patterns, the same types of event transportation management measures identified for the proposed project would be applicable under Alternative 2. Because Alternative 2 would result in greater construction-related transportation effects while operational transportation effects would generally be similar, Alternative 2 would result in a **slightly greater** level of transportation and circulation impact compared to the proposed project.

6.5.14 TRIBAL CULTURAL RESOURCES

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

No Tribal Cultural Resources have been identified at the project site, which was developed as a school in 1963. Due to the limited nature of project-related excavation and the fact that the project site has been previously disturbed for urban development, the probability of encountering Tribal Cultural Resources is low. However, because Alternative 1 would involve no ground-disturbing activities of any kind, it would result in a **reduced** level of impact compared to the proposed project.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

No Tribal Cultural Resources have been identified at the project site, and due to the limited nature of project-related excavation and the fact that the project site has been previously disturbed for urban development, the probability of encountering Tribal Cultural Resources is low. However, because Alternative 2 would involve a much larger amount of earthmoving activities over a larger area, it would result in a **greater** potential for impacts compared to the proposed project.

6.5.15 UTILITIES AND SERVICE SYSTEMS

ALTERNATIVE 1: NO PROJECT ALTERNATIVE

Because Alternative 1 would involve no construction associated with the proposed new lighting facilities, there would be no potential environmental impacts from the minor trenching to support replacement and new on-site underground electric power lines that would be required under the proposed project. Therefore, Alternative 1 would result in a **slightly reduced** level of impact from environmental effects associated with electrical infrastructure compared to the proposed project.

As with the proposed project, Alternative 1 would not increase student enrollment, expand the campus student population, or otherwise induce population growth and therefore would not increase water demand, wastewater treatment, or generation of solid waste beyond existing conditions. Therefore, the impacts from provision of these utilities under Alternative 1 would be **similar to the proposed project**.

ALTERNATIVE 2: RECONFIGURE STADIUM AND ATHLETIC FIELDS

Alternative 2 would result in an increased potential for environmental impacts associated with the provision of infrastructure necessary for electrical power, water supply, wastewater conveyance, and stormwater drainage due to the reconfiguration of the stadium and athletic fields. Therefore, compared to the proposed project, Alternative 2 would result in a **greater** level of impact from environmental effects associated with provision of infrastructure.

Alternative 2 would also result in an increased generation of solid waste during construction due to the greater area of land disturbance and demolition. Therefore, compared to the proposed project, Alternative 2 would result in a **slightly greater** level of impact from the temporary generation of solid waste.

Alternative 2 would also result in an increased demand for water supply during project operation to maintain the landscape buffer in perpetuity. Therefore, compared to the proposed project, Alternative 2 would result in a **slightly greater** level of impact from provision of water supply.

Operation of Alternative 2 would not increase wastewater treatment or conveyance, or the generation of solid waste, as compared to the proposed project, and therefore these impacts under Alternative 2 would be **the same** as the proposed project.

6.6 ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6-1 presents a comparison of the environmental impacts of the proposed project with those of the alternatives. As summarized in Table 6-1, for Alternative 1, 11 impact topics would have reduced or slightly reduced impacts compared to the proposed project and 4 impact topics would have greater or slightly greater impacts compared to the proposed project. For Alternative 2, no impact topics would be reduced compared to the proposed project and 13 impact topics would have greater or slightly greater impacts compared to the proposed project. Therefore, Alternative 1 is considered the environmentally superior alternative.

Table 6-1. Comparison of Impacts of the Alternatives to the Proposed Project

Environmental Topic Area	Alternative 1: No Project	Alternative 2: Reconfigure Stadium and Athletic Fields
Aesthetics	Visual Character: slightly reduced Conflicts with Standards: the same New Source of Light and Glare: slightly greater	Visual Character: greater Conflicts with Standards: the same New Source of Light and Glare: the same
Air Quality	Construction: reduced Operations: slightly greater	Construction: greater Operations: the same
Biological Resources	reduced	Construction: greater Operations: similar
Cultural Resources	reduced	greater
Energy Resources	Construction: reduced Operations: slightly greater	Construction: greater Operations: the same
Geology, Soils, and Paleontological Resources	reduced	greater
Greenhouse Gas Emissions	Construction: reduced Operations: slightly greater	Construction: greater Operations: the same
Hazards and Hazardous Materials	reduced	greater
Hydrology and Water Quality	reduced	greater
Land Use and Planning	the same	the same
Noise and Vibration	reduced	slightly greater
Recreation	greater	similar
Transportation	Construction: reduced Operations: reduced	Construction: greater Operations: the same
Tribal Cultural Resources	reduced	greater
Utilities and Service Systems	reduced	greater
Total Reduced Impact Topics	11	0
Total Increase Impact Topics	4	13

Source: Data Compiled by AECOM in 2026

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7 CUMULATIVE IMPACTS AND OTHER CEQA CONSIDERATIONS

7.1 CUMULATIVE IMPACTS

7.1.1 DEFINITION

This chapter provides an analysis of the cumulative impacts of the proposed project considered together with other past, present, and probable future projects producing related impacts, as required by Section 15130 of the CEQA Guidelines.

Cumulative impacts are defined in CEQA Guidelines Section 15355 as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” A cumulative impact occurs from “the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time” (CEQA Guidelines Section 15355[b]).

Consistent with CEQA Guidelines Section 15130(a), the discussion of cumulative impacts in this EIR focuses on significant and potentially significant cumulative impacts. CEQA Guidelines Section 15130(b), in part, provides the following:

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness, and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

7.1.2 APPROACH

CUMULATIVE PROJECTS CONSIDERED

CEQA Guidelines Section 15130(b)(1) identifies two basic methods for establishing the cumulative context within which a project may be considered: (1) the use of a list of past, present, and probable future projects; or (2) the use of adopted projections from a general plan, other regional planning document, or a certified EIR for such a planning document. This analysis uses the list approach, as described further below.

The list of cumulative projects considered in this cumulative analysis is presented in Table 7-1. This list includes representative past, present, and probable future projects in the vicinity of Rio Americano High School that relate to the impacts of the proposed project.

Table 7-1. List of Cumulative Projects

Project	Location	Description	Status
Cell Tower at Rio Americano High School	4540 American River Drive, Sacramento, CA	New 90-foot-tall monopole wireless communications tower and supporting equipment, including a shelter and backup generator. Ground lease area of approximately 1,500 square feet, with approximate dimensions of 60 x 26 feet. The cell tower would not be lighted. To be installed adjacent to and west of the campus' cafeteria/kitchen building, at the back of the campus.	Approved
Jesuit High School Stadium Lighting	1200 Jacob Lane, Carmichael, CA	New LED stadium lighting, IDA certified, on four monopoles, each 90–100 feet tall; pedestrian crossing with enhanced safety features at the intersection of Tennyson Way and American River Drive; upgraded public address system; low-level pedestrian safety lighting on the bleachers.	Completed
Ralph Richardson Center Modernization (San Juan Unified School District)	4848 Cottage Way, Carmichael, CA	Enlarge the existing classrooms, install restrooms in each classroom, construct a new nurse's suite, improve the parking/drop off area, improve the HVAC system, provide new dedicated equipment storage, and install shade for play areas.	Proposed

Source: Data compiled by AECOM in 2026

HVAC = heating, ventilation, and air conditioning

IDA = International Detailing Association

LED = light-emitting diode

7.1.3 CUMULATIVE IMPACT ANALYSIS

The following sections contain a discussion of the cumulative effects that may occur from implementation of the proposed project when considered in combination with the other cumulative projects listed in Table 7-1.

This cumulative analysis conforms with Section 15130 of the CEQA Guidelines, which specifies that the “discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great a detail as is provided of the effects attributable to the project alone.”

As discussed in detail in DEIR Chapter 5, there would be no impacts related to the following topic areas: agricultural and forestry resources, mineral resources, population and housing, public services, and wildland fire hazards. Therefore, the proposed project would not contribute to any cumulative impacts related to these topic areas, and no cumulative analysis of these topic areas is required.

AESTHETICS

The geographic scope of cumulative impacts on visual quality includes the viewsheds that would be affected by the project, consisting of views from public areas. The project site is surrounded by existing development – primarily residential development, but also Jesuit High School, approximately one-half mile north of the project site, a nursery and recreation center approximately two-thirds of a mile to the north, and Ashton Park, approximately 0.6 mile west of the project site. There are no designated scenic vistas or scenic State or County scenic highways in the vicinity. The American River Parkway is beyond the levee south of the project site, and will not experience development that would contribute to changes in visual character. The balance of the area surrounding the project site is built out, and the District does not anticipate development that would combine with the proposed project to create any cumulative impact related to a change in future visual character. However, the school was constructed in 1963, and incrementally in the years following construction of the school, surrounding

residential development in the past changed the visual character of the surrounding area substantially, and this past development is a **significant cumulative** impact. The proposed project would involve relatively minor visual changes to an existing high school campus – as an indication of the level of change, the total area disturbed by the proposed project for trenching, hardscape, and unpaved areas for installation of bleachers and lighting would be less than one percent of the area of the Rio Americano campus. The only public viewpoints in the project vicinity are from pedestrians, cyclists, and motorists traveling on American River Drive immediately north of the project site between Saverien Drive and Wixford Way, and from pedestrians and bicyclists on the paved crown (maintenance access road) of the north bank of the American River levee. The project site is not visible from the American River Parkway or the Jedediah Smith Memorial Trail due to the intervening elevated flood control levee. Portions of the proposed light poles would be visible from American River Drive and the American River Parkway, but they would be of a small diameter and would tend to blend in with the sky background. The proposed improvements would not substantially degrade the existing visual character or quality of public views of the site and would have a **less-than-cumulatively-considerable contribution** to the change in visual character from historical development of the area.

Regarding light and glare, existing development within the campus and surrounding area produces moderate levels of existing ambient illumination and the existing portable lighting on-site produces some glare, along with headlights of vehicles traveling on American River Parkway and other streets and roadways in the vicinity of the project site. Past development in the vicinity of the project site has combined to create a **significant cumulative** impact related to ambient light.

Under the proposed project, the portable lights currently creating glare would no longer be used for events at the track and field. The proposed sports lighting design and technology is specifically designed to minimize glare, skyglow, and light trespass. The proposed stadium lighting would result in zero light trespass off-site at public (American River Drive, Regency Circle, and the American River Parkway) and private (neighboring residences) viewpoints. Modeling also demonstrates that glare and skyglow would be reduced to levels that meet International Dark-Sky Association standards. Implementation of Mitigation Measure 4.1-2, which requires project design to undergo review by and obtain a DarkSky “pass” rating, would reduce the impacts of the proposed project to a less-than-significant level. Therefore, the project would not result in a new source of substantial light or glare that would adversely affect day or nighttime views in the area and would represent a **less-than-cumulatively-considerable contribution** to the cumulative impact of ambient light from previous development of the area.

AIR QUALITY

Construction-related activities associated with all of the projects considered in this cumulative analysis are required to comply with Sacramento Metropolitan Air Quality Management District (SMAQMD) rules and regulations established, in part, to ensure implementation of and consistency with strategies and actions of the applicable air quality plans. As discussed in detail in Section 5.2, “Air Quality,” of this EIR, modeling demonstrates that emissions generated during construction of the proposed project would not exceed the SMAQMD thresholds of significance. As discussed in the certified Jesuit High School Stadium Lighting Project EIR, modeling demonstrated that emissions generated during construction of that project (which has since been completed) would also not exceed the SMAQMD thresholds of significance. Due to the short duration and limited area of construction that would be necessary for the Rio Americano High School Cell Tower Project, it also would not exceed the SMAQMD thresholds of significance. Construction associated with the larger Ralph Richardson Center Modernization Project could exceed SMAQMD thresholds of significance. Construction

activities associated with all of the projects considered in this cumulative analysis would result in emissions of criteria air pollutants and ozone precursors, including reactive organic gases (ROG), nitrogen oxides (NO_x), particulate matter with aerodynamic diameter less than 10 microns (PM₁₀), and particulate matter with aerodynamic diameter less than 2.5 microns (PM_{2.5}). For these pollutants, the project region is designated as nonattainment under either the National Ambient Air Quality Standards (NAAQS) or California Ambient Air Quality Standards (CAAQS). The nonattainment status of regional pollutants is a result of past and present development within the air basin and nonattainment of federal and state ozone precursor and particulate matter standards is a significant cumulative impact.

Implementation of Mitigation Measure 5.2-1, which requires implementation of SMAQMD's Basic Construction Emission Control Practices, would reduce the impacts of the proposed project to a less-than-significant level. Similarly, the other projects considered in this cumulative analysis would also be required to implement SMAQMD's Basic Construction Emission Control Practices. Cumulative projects throughout the air basin would generate construction and operational air pollutant emissions that could contribute to regional air quality impacts. The SMAQMD thresholds of significance serve as a proxy for determining whether the project could result in a cumulatively considerable net increase of any criteria air pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard, and/or conflict with any applicable air quality plan. Therefore, because the project's emissions do not exceed SMAQMD thresholds, the proposed project would not conflict with or obstruct implementation of the applicable air quality plan and would not result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment. Therefore, construction of the proposed project would result in a **less-than-cumulatively considerable contribution** to the significant cumulative impact.

The proposed project's operations, as well as the Jesuit High School Stadium Lighting Project operations, would include an intermittent increase in vehicle trips to and from the Rio Americano High School campus and nearby Jesuit High School campus during the respective schools' events, which would generate localized mobile source emissions of criteria air pollutants and precursors (ROG, NO_x, PM₁₀, and PM_{2.5}). However, modeling performed for the proposed project's operations (detailed in Section 5.2, "Air Quality," of this EIR) and for the certified Jesuit High School Stadium Lighting Project EIR, demonstrated that neither project would approach or exceed any SMAQMD threshold. The Rio Americano High School Cell Tower Project would result in only occasional vehicle trips for any necessary maintenance. If attendance at the Ralph Richardson Center Modernization Project were to increase as a result of that project, then mobile source emissions would also increase. However, the majority of mobile-source emissions would be regional in nature (i.e., occurring over the length of the trip and not localized at the Rio Americano High School campus) and would not combine to result in a significant increase in localized emissions. Furthermore, the proposed project would install lights powered by electricity and replace the currently used diesel-powered lights, thereby eliminating this existing on-site emissions source. Because the project's emissions do not exceed SMAQMD thresholds, operation of the proposed project would not conflict with or obstruct implementation of the applicable air quality plan and would not result in a cumulatively considerable net increase of criteria pollutants for which the project region is non-attainment. Therefore, operation of the proposed project would result in a **less-than-cumulatively considerable contribution** to the significant cumulative air quality impact represented by nonattainment of state and federal criteria air pollutant emissions standards.

Criteria air pollutants can have human health effects at various concentrations, dependent upon the duration of exposure and type of pollutant. Toxic air contaminants (TACs) are primarily generated by construction

equipment, and they disperse rapidly with distance. Currently, the California Air Resources Board and the U.S. Environmental Protection Agency 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.” As discussed in detail in Section 5.2, “Air Quality,” of this EIR, modeling demonstrates that emissions generated during construction of the proposed project would not exceed the SMAQMD thresholds of significance. As discussed in the certified Jesuit High School Stadium Lighting Project EIR, modeling demonstrated that emissions generated during construction of that project (which has since been completed) would also not exceed the SMAQMD thresholds of significance. Construction-related emissions of TACs, for both the proposed project and the Rio Americano High School Cell Tower Project, would be generated at a low level (due to the low level of construction) and would be short-term and temporary (over a period of a few weeks), and the Jesuit High School Stadium Lighting Project has been completed. All of the projects considered in this cumulative analysis would be required to implement SMAQMD’s Basic Construction Emission Control Practices. Furthermore, criteria air pollutants emitted during cumulative project operations would be very small and would not exceed or even approach SMAQMD thresholds. Furthermore, due to the low level of new trips that would be generated by the proposed project and the cumulative projects, improved vehicle emissions standards for carbon monoxide (CO), and lack of conditions that would limit dispersion of CO emissions from vehicle exhaust, the proposed project would not cumulatively contribute to violation of air quality standards for CO nor have the potential to result in CO hotspots. Furthermore, regionally, the proposed project is shifting the location of events and related trips rather than generating new trips, as detailed in Section 4.4, “Transportation and Circulation.” Therefore, when combined with the emissions of the projects considered in this cumulative analysis, the proposed project would not expose sensitive receptors to substantial pollutant concentrations that could result in adverse health effects. Thus, the proposed project would result in **less-than-significant** cumulative impacts.

With regard to odor impacts, none of the cumulative projects include operation of new land uses that would emit objectionable odors. Construction equipment generates odorous emissions. However, the Jesuit High School Stadium Lighting Project has been completed, and therefore would not result in an overlap of construction odors with the proposed project. The Ralph Richardson Center Modernization Project is too far away to result in cumulative odor emissions (approximately 1 mile to the north), and furthermore would not be constructed until after the proposed project is completed. The Rio Americano High School Cell Tower Project would involve such a small amount of construction equipment that even if construction did occur at the same time as the proposed project, substantial odorous emissions would not be generated. Thus, the proposed project would result in **less-than-significant** cumulative impacts.

BIOLOGICAL RESOURCES

Within the Sacramento region, biological resources remain subject to cumulative impacts driven by urbanization. However, this project will not contribute to any permanent habitat loss or significant, unavoidable impacts to biological resources. The proposed project will have no impact on consistency with any NCCP or HCP or ordinance, and no direct impact on federally protected wetlands, riparian habitat, or sensitive natural communities.

The project site is surrounded to the east, west, and north by residential development. To the south, the project site is separated from the American River Parkway (Parkway) by the elevated American River levee. The Parkway is

an open space and natural preserve area that provides recreational opportunities among the natural, aesthetic, and historical resources found along both sides of the American River. Recreational activities along the Parkway consist of hiking, jogging, bicycling, bird watching, dog walking, and recreational boating. The multi-use trail atop the levee is accessible via the southeast side of Rio Americano High School and this levee trail provides connection to the Jedediah Smith Memorial Trail, which is located within the Parkway. There is no vehicular access to the portion of the Parkway near the Rio Americano High School campus; access is limited to pedestrian and bicycles only from the crown of the adjacent north bank American River levee. The levee crown is not part of the Parkway and is paved.

Though no sensitive biological resources or special-status species have been identified on the project site, trees and shrubs along the southern border of the project site may provide suitable habitat for valley elderberry longhorn beetle and nesting special-status birds. In addition, the riparian habitat of the Parkway, which begins approximately 100 feet from the southernmost boundary of Rio American High School and is separated from the project site by the elevated flood protection levee, provides suitable foraging, nesting, roosting, refugia, and hibernation habitat for special-status or otherwise protected species, including valley elderberry longhorn beetle, northwestern pond turtle, special-status and migratory birds, and bats (see Table 4.2-1). While project construction could potentially disrupt wildlife communities, as detailed in Section 4.2, “Biological Resources,” of this EIR, implementation of the project’s mitigation measures would protect special-status wildlife species and nesting birds over the short duration of project construction.

Under existing conditions, some nighttime activities occur and generate noise, with temporary diesel-powered light towers, which also generate localized engine noise during use. Operational lighting and noise that would result from the proposed project were evaluated in detail based on modeling conducted for the purposes of the project, and found to result in less-than-significant impacts to biological resources. Given the non-substantial change to baseline lighting and minor, infrequent increases in operational noise, as detailed in Section 4.2, “Biological Resources,” of this EIR, operational impacts to biological resources would be less than significant. Furthermore, construction and operational impacts would largely be confined to developed areas within the school campus, and only minor, infrequent increases in noise levels, similar to measured maximum noise levels under existing conditions, would reach sensitive habitats along the Parkway.

Therefore, the proposed project would result in **less-than-significant** cumulative impacts for biological resources.

CULTURAL RESOURCES

No archaeological resources or human remains have been identified at the project site, which was developed as a school in 1963, and due to the limited nature of project-related excavation and the fact that the project site (as well as the Rio Americano High School Cell Tower project site) has been previously disturbed for urban development, the probability of encountering significant archaeological resources as defined by CEQA Guidelines Section 15064.5 or human remains during project-related construction is low. A similar situation exists for the Ralph Richardson Center Modernization Project and the Jesuit High School Stadium Lighting Project, both of which have been fully developed with school uses since the 1960s. Furthermore, the Jesuit High School Stadium Lighting Project has been completed, and no cultural resources were encountered. With implementation of Mitigation Measures 5.3-1 and 5.3-2, which provide appropriate actions to protect and preserve any inadvertent discoveries of cultural resources or human remains, the proposed project, when considered in combination with the projects considered in this cumulative analysis, would result in **less-than-significant** cumulative impacts.

ENERGY

Energy use during construction of the proposed project would be minor in nature (due to the small size of the proposed project) and of short duration (several weeks). Minor increases in energy use would result from operation of the proposed new lighting. Most of the energy use from increased vehicular travel to the stadium during nighttime games would simply be redirected rather than new emissions, because currently the Rio Americano High School night games are held at El Camino High School Stadium approximately 3 miles to the north. Furthermore, the proposed project would replace existing use of diesel-powered portable lights with the proposed electrically-powered lights, which would include at least a portion of the power mix sourced from renewable energy resources, per state law for renewable portfolio standards for utility providers. Therefore, the proposed project would not adversely affect energy resources or energy conservation, and the project's energy demand would not constitute a wasteful, inefficient, or unnecessary use of energy. Energy usage for the Jesuit High School Stadium Lighting Project is similar to the proposed project, and energy usage for the Rio Americano High School Cell Tower project would be less than the proposed project. Energy usage for the Ralph Richardson Center Modernization Project would be greater, but would still involve limited construction over a short time period (several months). Due to the small size of the proposed project and the small amount of energy consumed, the proposed project, when considered in combination with the projects considered in this cumulative analysis, would result in **less-than-significant** cumulative impacts.

GEOLOGY AND SOILS

The extent of soil disturbance during construction activities at the project site would be minor. The San Juan Unified School District's construction contractor would be required to implement Best Management Practices (BMPs) designed to control erosion and sediment transport at the project site, similar to the Jesuit High School Stadium Lighting Project and the Rio Americano High School Cell Tower Project. Due to the larger size of the Ralph Richardson Center Modernization Project, projects that disturb one acre or more of land area are required by law to prepare a Storm Water Pollution Prevention Plan (SWPPP) and implement site-specific BMPs that are specifically designed to prevent construction-related erosion. Therefore, since larger projects are required to implement BMPs, and since the District's contractor/s will be required to implement BMPs to control erosion via air quality-related mitigation, the proposed project, when considered in combination with the projects considered in this cumulative analysis, would result in **less-than-significant** cumulative impacts.

GREENHOUSE GAS EMISSIONS

Climate change impacts from greenhouse gas (GHG) emissions are inherently cumulative in nature. It is unlikely that a single project will contribute significantly to climate change, but cumulative emissions from many projects could affect global GHG concentrations and the climate system. Section 5.6, "Greenhouse Gas Emissions," of this Draft EIR, considers the cumulative contribution from the proposed project to the significant cumulative impact of climate change, and concludes that the impacts of the proposed project would be **less than cumulatively considerable**.

HAZARDS AND HAZARDOUS MATERIALS

The proposed project and the projects considered in this cumulative analysis are required to comply with local, state, and federal regulations for transport, use, disposal, and handling of hazardous materials, which would address impacts associated with construction-related use of small quantities of hazardous materials. Furthermore,

given the small size of the proposed project and the cumulative projects, substantial amounts of TACs would not be generated and because construction would occur during the summer months where students are not present, school students would not be exposed to TAC hazards. Therefore, the proposed project, when considered in combination with the projects considered in this cumulative analysis, would result in **less-than-significant** cumulative impacts.

The proposed light standards at Raider Stadium, as well as the light standards that were installed at the Jesuit High School stadium and the proposed Rio Americano High School Cell Tower (all of which would be of similar heights), are not situated within the Code of Federal Regulations Title 14 Part 77 imaginary airspace surfaces or the overflight notification area for Mather Airport, and are more than 2 miles from any airport. 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. The same was true for the Jesuit High School Stadium lighting project. Therefore, the proposed project lighting would not contribute to glare or skyglow and would not result in hazardous glare for aircraft pilots en route to Mather Airport. No high-mast light standards are proposed as part of the Ralph Richardson Center Modernization Project. The Rio Americano High School Cell Tower would not represent an aviation hazard from either its height or its location, and would not be lighted at night. Therefore, the proposed project, when considered in combination with the projects considered in this cumulative analysis, would result in **less-than significant** cumulative impacts.

The Sacramento County Emergency Operations Plan and the County Evacuation Plan identify the County's actions and coordination of responses to emergency situations. Furthermore, the County has developed evacuation zones and designated evacuation routes. Development of the other project sites are subject to review by the Sacramento Metropolitan Fire District and school projects such as the proposed project and the cell tower project at the Rio Americano High School campus are subject to review for building, structural, and fire/life safety code compliance by the Division of the State Architect of the California Department of Education, including review of appropriate ingress and egress relating to appropriate driveway design to accommodate emergency vehicles and emergency evacuation thoroughfares. Emergency access to the project site would not change from existing conditions, which includes multiple drive aisles from American River Drive. The existing on-site circulation network, which is regulated by the California Department of Education to ensure safe pedestrian and vehicular ingress and egress, including emergency situations, would continue to be used. Attendance at Raider Stadium for larger sporting events would increase from the existing 288-person maximum capacity to a 2,575-person maximum capacity. However, the large Rio Americano High School athletic sporting events that generate the 2,575-person attendance are already occurring off-site at the El Camino High School stadium approximately 3 miles to the north, and would be shifted to the Rio Americano stadium at the completion of project construction. The area surrounding the project site, as well as the other cumulative projects and the El Camino High School, are developed and served by a grid of interconnecting north-south and east-west streets that are now and would continue to support in the future the traffic generated from the Rio Americano sporting events regardless of location. For the limited instances that the Rio Americano High School parking lot would be used for Jesuit High School event parking (which has occurred once over the past two years), Rio Americano High School officials would coordinate with Jesuit High School officials to ensure that overlap with Rio Americano sporting events does not occur, and therefore such use would not result in an additional increase in the amount of emergency evacuation from Rio Americano during those two events. Similarly, per Mitigation Measure 4.4-3a would require a memorandum of understanding for the reciprocal use of the Jesuit High School parking during peak-attendance events at Rio Americano High School, and similar planning between the two schools would take place to ensure

that peak events at both schools would not overlap and emergency evacuation would not be affected. Traffic from any necessary evacuation from either the project site or the cumulative project sites would be dispersed throughout the roadway grid network as shown in the *Sacramento County Evacuation Plan* (Sacramento County Office of Emergency Services 2021) and directed by the Sacramento County Sheriff's Office. Furthermore, the project site and the cumulative project sites are 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 at all of the area schools 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. Therefore, the proposed project, when considered in combination with the projects considered in this cumulative analysis, would result in **less-than-significant** cumulative impacts.

HYDROLOGY AND WATER QUALITY

Due to the small size of the soil area that would be disturbed, a SWPPP under the NPDES permit program would not be required for the proposed project. The extent of soil disturbance during construction activities would be minor. The District's construction contractor would implement Best Management Practices (BMPs) designed to control erosion and the transport of sediment and other pollutants from the project site, similar to the Jesuit High School Stadium Lighting Project and the Rio Americano High School Cell Tower Project, thus protecting water quality. Project-related construction activities that would disturb one acre or more (such as the Ralph Richardson Center Modernization Project), must comply with the SWRCB's NPDES Construction General Permit, which requires development of a SWPPP and implementation of BMPs specifically designed to reduce erosion and prevent pollutant transport, thereby protecting water quality. Furthermore, operation of all the cumulative projects, particularly the changes associated with the larger Ralph Richardson Center Modernization Project, must be designed and operated in compliance with the County's NPDES MS4 stormwater operational permit requirements. Therefore, substantial degradation of water quality or conflicts with the Basin Plan would not occur. The proposed improvements at the project site, as well as the improvements associated with the cumulative projects, would be small in size and would result in only a slight increase in impervious surfaces as compared to existing conditions, and therefore would not substantially increase stormwater runoff or result in substantially reduced groundwater recharge, or result in conflicts with the North American Subbasin Groundwater Sustainability Plan. Finally, although the project site is in a 200-year flood zone, 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, and thus there would be no potential for the project to risk a release of pollutants during project inundation. For the reasons explained above, the proposed project, when considered in combination with the projects considered in this cumulative analysis, would result in **less-than-significant** cumulative impacts.

LAND USE

The project will occur on the Rio Americano High School campus at the existing Raider Stadium, which is surrounded by existing development – primarily single family residential – to the west, north, and east, and associated existing roadways and infrastructure, and the Parkway to the south. The project site is a public high school campus property and will remain in its existing condition. 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 project would not

result in project impacts associated with division of an established community and would have no cumulative impact. Additionally, the project would not conflict with any land use plan, policy, or regulation and would not result in cumulative impacts as it relates to land use plan consistency. Specific impacts and consistency issues associated with other resource and issue areas are addressed in each topic area section of this EIR, as appropriate. Therefore, the proposed project, when considered in combination with the projects considered in this cumulative analysis, would result in **less than significant** cumulative impacts.

NOISE AND VIBRATION

Construction of the proposed project could result in temporary construction noise and vibration at nearby residences and sensitive receptors. Other cumulative projects identified in Table 7-1 could also generate temporary construction noise and vibration; however, the Jesuit High School Stadium Lighting Project has been completed, the Rio Americano High School Cell Tower Project would involve limited construction activity, and the Ralph Richardson Center Modernization Project is approximately 1 mile from the project site. Because construction noise and vibration are localized and attenuate with distance, and because construction activities for these projects would be temporary and would not be expected to substantially overlap at the same sensitive receptors, the proposed project would not combine with cumulative projects to result in a significant cumulative construction noise or vibration impact. Nonetheless, as discussed in Section 4.3, “Noise and Vibration,” the temporary increase in noise levels at nearby receptors as a result of construction activity, while it would only occur for a limited duration and would not change long-term ambient noise conditions around the project site, for the purposes of this EIR, is considered clearly perceptible and would also represent a substantial temporary increase in ambient noise levels well above +5 dBA; this short-term construction-related impact is considered potentially significant and feasible mitigation cannot reduce the impact to a less-than-significant level. Existing noise in the vicinity of the project site is dominated by traffic noise, and temporary construction noise from the project would combine with ongoing traffic noise, as experienced by adjacent noise-sensitive uses. Therefore, the proposed project’s contribution to a significant cumulative impact would be cumulatively considerable, and this impact would be **cumulatively significant and unavoidable**.

Operational noise from the proposed project would primarily occur during intermittent stadium events and would include crowd noise, bleacher activity, band activity, public address/amplified sound, parking activity, and event-related traffic. The Jesuit High School Stadium Lighting Project could also generate intermittent stadium event noise; however, it is located approximately 0.5 mile from Rio Americano High School and would not combine with proposed project event noise at the same residential receptors since noise levels attenuate at approximately 6 decibels for every doubling of distance. The Rio Americano High School Cell Tower Project would not include a substantial operational noise source other than occasional maintenance activity, and the Ralph Richardson Center Modernization Project would not include stadium event activity comparable to the proposed project. Because operational event noise would be intermittent and localized, and because the cumulative projects would not expose the same receptors to overlapping substantial stadium event noise, the proposed project would not make a cumulatively considerable contribution to cumulative operational noise impacts. However, as discussed in Section 4.3, “Noise and Vibration,” the proposed project would result in a significant and unavoidable project-level operational noise impact during intermittent high-capacity events. Therefore, the proposed project’s contribution to a significant cumulative impact would be cumulatively considerable, and this impact would be **cumulatively significant and unavoidable**.

RECREATION

Installation of the new communications tower at the Rio Americano High School campus would have no effect on recreation, either on the school campus for the students or off-campus at the American River Parkway for the general public. The Ralph Richardson Center Modernization Project includes sufficient recreation for that school's students, and installation of shade for the outdoor play areas would improve recreation at the existing school campus. The proposed project, as well as the Jesuit High School Stadium Lighting Project, involves improvements to the respective existing on-campus high school stadiums. As discussed in the certified Jesuit High School Stadium Lighting Project EIR, views of the nighttime lighting at that stadium from the American River Parkway would be blocked due to the distance and the intervening vegetation. As discussed in Section 3.1, "Aesthetics," of this EIR and shown in the visual simulations included therein, only the tops of the two proposed light standards closest to the back of the Rio Americano High School property would be visible from the American River Parkway, and the Parkway is closed to public use after dark. Furthermore, motor vehicle access to the Parkway is prohibited at all times, and since the proposed stadium lighting would only be operated after dark when the Parkway is closed to public use, there would be no potential for conflicts between Parkway access or recreational use and the proposed project. Although the proposed project would increase the attendance at events held at the existing Raider Stadium, additional bleacher seating at the stadium is included as part of the proposed project. Furthermore, Rio Americano High School would no longer have a need to use the El Camino High School Stadium for nighttime games, and thus there would be no use of existing off-site recreational facilities such that substantial physical deterioration of the off-site facility would be accelerated. Therefore, the proposed project, when considered in combination with the projects considered in this cumulative analysis, would result in **less-than-significant** cumulative impacts.

TRIBAL CULTURAL RESOURCES

No Tribal Cultural Resources have been identified at the project site, which was developed as a school in 1963, and due to the limited nature of project-related excavation and the fact that the project site (as well as the Rio Americano High School Cell Tower project site) has been previously disturbed for urban development, the probability of encountering Tribal Cultural Resources during project-related construction is low. A similar situation exists for the Ralph Richardson Center Modernization Project and the Jesuit High School Stadium Lighting Project, both of which have been fully developed with school uses since the 1960s. Furthermore, the Jesuit High School Stadium Lighting Project has been completed, and no Tribal Cultural Resources were encountered. With implementation of Mitigation Measures 4.5-1a through 4.5-1c, which provide Tribal Cultural Awareness and Sensitivity Training (training) for all personnel involved in ground-disturbing construction work, protocols for inadvertent discovery of TCRs, including cessation of construction activities proximate to the discovery and notification of the appropriate, and monitoring during ground disturbing activities, the proposed project, when considered in combination with the projects considered in this cumulative analysis, would result in **less-than-significant** cumulative impacts.

UTILITIES AND SERVICE SYSTEMS

The improvements associated with the proposed project, as well as the Rio Americano High School Cell Tower Project and the Jesuit High School Stadium Lighting Project, 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 school campuses. Physical environmental impacts associated with any changes to existing utilities which may be

required for the Ralph Richardson Center Modernization Project would be evaluated in the individual topic area sections of the environmental document prepared for that project. **No cumulative impact** would occur.

The proposed project, as well as the Rio Americano High School Cell Tower Project and the Jesuit High School Stadium Lighting Project, would not increase water demand beyond existing conditions. An increase in potable water demand could be required for the Ralph Richardson Center Modernization Project due to the increased number of restrooms. However, since the proposed project would not require an increase in water demand, **no cumulative impact** would occur as a result of the proposed project.

The proposed project, as well as the Rio Americano High School Cell Tower Project and the Jesuit High School Stadium Lighting Project, would not increase wastewater conveyance or treatment beyond existing conditions. An increase in wastewater conveyance and treatment could be required for the Ralph Richardson Center Modernization Project due to the increased number of restrooms. However, since the proposed project would not require an increase in wastewater conveyance or treatment, **no cumulative impact** would occur as a result of the proposed project.

The proposed project, as well as the Rio Americano High School Cell Tower Project and the Jesuit High School Stadium Lighting Project, would not substantially increase solid waste generation. Soil excavated during construction of all three projects, plus the Ralph Richardson Center Modernization Project, would be reused on site as backfill to the extent possible. There would be no increase in operational solid waste from the Rio Americano High School Cell Tower Project and the Jesuit High School Stadium Lighting Project, and the increase in solid waste during Rio Americano High School nighttime sporting events would represent a shift in the location of waste generated (i.e., from El Camino High School where nighttime games are currently held), and therefore would not result in an overall increase in the total amount of County-wide waste generated. An increase in solid waste generated for operation of the Ralph Richardson Center Modernization Project could occur due to larger facilities. However, all of the cumulative San Juan Unified School District projects would adhere to the District's established procurement and waste-management practices, including recycling and diversion requirements designed to reduce solid waste and promote recycling in compliance with federal, State, and local solid waste management and reduction statutes and regulations. Therefore, the proposed project, when considered in combination with the projects considered in this cumulative analysis, would result in **less-than-significant** cumulative impacts.

TRANSPORTATION AND CIRCULATION

Cumulative transportation and circulation impacts could occur if the proposed project, in combination with other projects and activities in the surrounding area, increased event parking demand, vehicle circulation, pedestrian and bicycle activity, or vehicle queuing on the same transportation facilities.

The LTA evaluated a conservative scenario in which a football game at Rio Americano High School would occur concurrently with a football game at nearby Jesuit High School. Under this combined-event scenario, projected queues at American River Drive and Saverien Drive/Project Driveway 2 and at American River Drive and Jacob Lane would remain within the available turn-lane storage. The westbound left-turn queue at Fair Oaks Boulevard and Saverien Drive would exceed the available painted storage under both the project-only and combined-event scenarios (Kimley-Horn 2026a). As described in Section 4.4, "Transportation and Circulation, the LTA notes that event-specific signal timing and removal or modification of the existing concrete median behind the westbound left-turn pocket at Saverien Drive and Fair Oaks Boulevard could allow vehicles to queue within the existing two-

way left-turn lane and limit potential interference with westbound through traffic (Kimley-Horn 2026a). However, these peak-attendance events and related potential queuing deficiencies would occur only during intermittent high-capacity events, which would typically occur outside of peak-travel demand hours. Therefore, such permanent modifications would not be appropriate or necessary to address the very limited number of new peak-attendance events that could occur with implementation of the proposed project, particularly because such events would not overlap with peak-hour traffic demand on the surrounding transportation network, which would occur earlier in the afternoon, and since the adequate sight distances means that vehicles approaching a queue may need to temporarily slow, but that there would be no adverse impact. Furthermore, implementation of Mitigation Measure 4.4-3a to address potential impacts associated with implementation of the proposed project would help reduce this queue because some attendees would instead travel to Jesuit High School for off-site, overflow parking made available for the annual or biennial peak-attendance event.

The proposed project would not remove or modify an existing roadway, transit facility, bicycle lane, sidewalk, or multiuse path. Construction-related transportation effects would be temporary and would occur primarily within the existing school campus. Emergency access would be maintained throughout construction through continued use of the existing fire lane or provision of a clearly designated alternate emergency-access route. In addition, the VMT Analysis estimates that relocating varsity home football games from El Camino High School to Rio Americano High School would result in a net reduction in regional game day VMT (Kimley-Horn 2026b).

Implementation of Mitigation Measures 4.4-3a through 4.4-3c would require the District to develop a use agreement with nearby Jesuit High School for off-site parking during high-attendance events, manage event parking and circulation, direct motorists and pedestrians to designated locations and routes, implement appropriate pedestrian crossing treatments, and maintain unobstructed pedestrian, bicycle, and emergency-access facilities. These measures would reduce the proposed project's contribution to conflicts among vehicles, pedestrians, and bicyclists and would prevent project-generated queues from interfering with through traffic or other transportation facilities. Therefore, with implementation of Mitigation Measure 4.4-3a through 4.4-3c, the proposed project's contribution to cumulative transportation hazards would **be less than cumulatively considerable**.

7.2 GROWTH INDUCEMENT

An EIR must discuss the ways in which a proposed project could foster economic or population growth or the construction of additional housing in the vicinity of the project, and how that growth will, in turn, affect the surrounding environment (see CEQA Guidelines Section 15126.2[d]). Growth can be induced in a number of ways, including through the elimination of obstacles to growth, or through the stimulation of economic activity within the region. The discussion of the removal of obstacles to growth relates directly to the removal of infrastructure limitations or regulatory constraints that could result in growth unforeseen at the time of project approval.

The proposed project includes the construction and operation of stadium lights at Rio Americano High School. The project does not include new housing or employment uses or new infrastructure that could foster economic or population growth. Therefore, the proposed project would not result in direct or indirect growth-inducing impacts.

7.3 IRREVERSIBLE ENVIRONMENTAL CHANGES

Section 15127 of the CEQA Guidelines requires an EIR to address significant irreversible environmental changes where the proposed project involves any of the following:

- a) the adoption, amendment, or enactment of a plan, policy, or ordinance of a public agency;
- b) the adoption by a Local Agency Formation Commission of a resolution making determinations; or
- c) a project which will be subject to the requirement for preparing an Environmental Impact Statement [EIS] pursuant to the requirements of the National Environmental Policy Act of 1969, 42 U.S.C. 4321–4347.

Because the proposed project does not meet any of these conditions, an analysis of significant irreversible environmental changes is not required.

7.4 SIGNIFICANT AND UNAVOIDABLE ADVERSE IMPACTS

Section 15216.2(b) of the CEQA Guidelines requires EIRs to include a discussion of any significant environmental impacts that cannot be avoided if the project is implemented. Chapters 4 and 5 of this EIR provide a detailed analysis of all significant and potentially significant environmental impacts related to implementing the proposed project; identify feasible mitigation measures, where available, that could avoid or reduce these significant and potentially significant impacts; and present a determination whether these mitigation measures would reduce these impacts to less-than-significant levels. In addition, Section 7.1 identifies the significant cumulative impacts resulting from the combined effects of the proposed project and the related projects. If a specific impact cannot be fully reduced to a less-than-significant level, it is considered a significant and unavoidable adverse impact. The project's single significant and unavoidable adverse impacts is provided below.

7.4.1 PROJECT-LEVEL NOISE AND VIBRATION

- 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.

CUMULATIVE IMPACTS

- Cumulatively considerable short-term construction and long-term operational impacts.

7.5 MANDATORY FINDINGS OF SIGNIFICANCE

While not required under CEQA, this EIR provides a discussion of Mandatory Findings of Significance. In accordance with California Code of Regulations, Title 14 § 15065, “a lead agency shall find that a project may have a significant effect on the environment and thereby require an EIR to be prepared for the project where there is substantial evidence, in light of the whole record, that any of the following conditions may occur.”

- a) The project has the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a

rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

Less than Significant with Mitigation Incorporated. Though no sensitive biological resources or special-status species have been identified on the project site, trees and shrubs along the southern border of the project site may provide suitable habitat for valley elderberry longhorn beetle and nesting special-status birds. In addition, the riparian habitat of the Parkway, which begins approximately 100 feet from the southernmost boundary of Rio American High School and is separated from the project site by the elevated flood protection levee, provides suitable foraging, nesting, roosting, refugia, and hibernation habitat for special-status or otherwise protected species, including valley elderberry longhorn beetle, northwestern pond turtle, special-status and migratory birds, and bats (see Table 4.2-1). While project construction could potentially disrupt wildlife communities, as detailed in Section 4.2, “Biological Resources,” of this EIR, implementation of Mitigation Measures 4.2-1a through 4.2-1e provide appropriate actions to avoid and minimize potential impacts during construction on special-status and other protected species, including valley elderberry longhorn beetle, northwestern pond turtle, Swainson’s hawk, white-tailed kite, and song sparrow. These measures include education of on-site workers about biological resources at the project site and best management practices to minimize the potential for spills or other indirect impacts to these resources. Species-specific impacts would be avoided through implementation of no-disturbance buffers around suitable habitat for valley elderberry longhorn beetle and nests located during preconstruction surveys, and monitoring construction activities occurring near these resources. Implementation of Mitigation Measures 4.2-1a through 4.2-1e would reduce potentially significant impacts to a less-than-significant level.

Under existing conditions, some nighttime activities occur and generate noise, with temporary diesel-powered light towers, which also generate localized engine noise during use. Operational lighting and noise that would result from the proposed project were evaluated in detail based on modeling conducted for the purposes of the project, and found to result in less-than-significant impacts to biological resources. Although it is not required to mitigate for a less than significant impact, the District will voluntarily bind itself for this impact to implement a mitigation measure requiring the District to obtain a “pass” rating of the proposed stadium lighting system by the International Dark-Sky Association prior to installation of the system. The International Dark-Sky Association “pass” rating of the project’s proposed stadium lighting would indicate the backlight, uplight, and glare generated by the proposed stadium lighting would meet the International Dark-Sky Association’s standards to reduce glare to a level that would not cause annoyance or disruption, and would demonstrate the design’s effectiveness in reducing skyglow to a low level.

No archaeological resources or human remains have been identified at the project site, which was developed as a school in 1963, and due to the limited nature of project-related excavation and the fact that the project site has been previously disturbed, the probability of encountering significant archaeological resources as defined by CEQA Guidelines Section 15064.5 or human remains under the proposed project is low. Review of the Rio American High School Sports Facility pedestrian survey conducted in 2010 by AECOM, a new records search and Native American consultation efforts were conducted to establish prior, and new identification efforts of TCRs that may be present in the project site, and furthermore, may be impacted by implementation of the proposed project. As part of the Native American consultation efforts, the UAIC also conducted in-house research to identify any TCRs for this project and shared their methodology and results with AECOM. No Tribal Cultural Resources have been identified at the project site. Through the AB 52 consultation process, UAIC recommended mitigation measures, included as Mitigation Measure 4.5-1a, to reduce potential impacts to less than significant through Tribal Cultural Awareness and Sensitivity Training for all personnel involved in ground-disturbing

construction work, protocols for inadvertent discovery of TCRs, including cessation of construction activities proximate to the discovery and notification of the appropriate, and monitoring during ground disturbing activities. Mitigation language was also reviewed and approved by Wilton Rancheria, the other consulting Tribe for the project.

- b) The project has the potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals.

The project involves improvements within the existing Rio Americano High School campus. Short-term construction activities would result in temporary environmental effects (e.g., construction emissions, earthwork, noise, and traffic). As analyzed in this EIR (see Sections 4.1 through 4.5 and Chapter 5) these effects are temporary and would be reduced through standard construction controls and mitigation where required.

Over the long term, the project would improve the existing facilities with higher-efficiency systems and design features such as replacing existing diesel-powered portable lights that point outward and have limited controls over brightness, glare, and directionality (e.g., light trespass) with electrically powered lights that would no on-site emissions, be directed downward and designed to avoid light trespass and glare. In addition, a regional game day VMT benefit achieved would be achieved under the proposed project due to shifting the location of existing games from an off-site high school to the home school facilities. The project would not commit the District to technologies or designs that lock in higher long-term resource consumption, GHG emissions, VMT, or pollutant exposure and would result in minimal increase in impervious surface area and would not result in increased water demand or waste generation.

The project would not conflict with long-term environmental goals or adopted policies for climate, air quality, mobility, habitat protection, or community health.

Mitigation measures identified for resource specific topic areas, including 4.2-1a through 4.2-1e for biological resources, 4.5-1a through 4.5-1c for tribal cultural resources and 5.2-1 for air quality, reduce potential project impacts on the environment to less than significant. Therefore, the project would not achieve short-term environmental goals to the disadvantage of long-term environmental goals.

- c) The project has impacts that are individually limited, but cumulatively considerable (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)

Cumulative impacts are detailed above, in Section 7.1.3, “Cumulative Impact Analysis.” Per the evaluation contained therein, the project does not result in impacts that are individually limited, but cumulatively considerable. As explained in Section 4.3, “Noise and Vibration,” and above in Section 7.1.3, “Cumulative Impacts,” the proposed project could result in significant and unavoidable noise impacts as a result of temporary construction noise increases and intermittent long-term operational noise increases during large events; these project noise sources would combine with existing noise sources, which is dominated by existing traffic, and result in cumulatively considerable short-term construction and long-term operational impacts.

- d) The project has environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly.

As evaluated in this EIR, short-term construction activities would generate temporary air emissions and noise and involve equipment that could pose hazards if not properly managed. With implementation of standard construction controls and mitigation where required— construction noise reduction measures, emissions reduction best management practices, proper handling of equipment and hazardous materials, and stormwater BMPs—the potential for project construction to result in substantial adverse effects on nearby receptors would be reduced to less than significant for all but noise, which would remain significant and unavoidable (see Sections 4.3, “Noise and Vibration,” 4.4, “Transportation and Circulation,” 5.2, “Air Quality,” 5.7, “Hazards and Hazardous Materials,” and 5.8, “Hydrology and Water Quality.” Construction noise would remain approximately 15 to 25 dBA above measured daytime ambient levels of 51 to 62 dBA L_{eq} . Therefore, although the highest noise-generating activities during construction would be temporary and limited in duration, residual construction noise impacts would remain significant and unavoidable.

Over the long term, project operation would occur within the existing campus. and incorporate design features and mitigation that protect human health and safety, such as the replacement of diesel-powered portable lights with electrically-powered permanent lights, lighting designed with shielding and curfews to limit glare and spillover, emergency access maintained in accordance with fire code, and operational noise management measures and design features, traffic and circulation management measures during events (see Sections 4.1, “Aesthetics,” 4.3, “Noise and Vibration,” 4.4, “Transportation and Circulation,” and 5.2, “Air Quality,”). The project would not introduce new long-term sources of toxic air contaminants or persistent excessive noise affecting sensitive receptors, and would not increase exposure to flooding, geologic hazards, or hazardous materials beyond regulatory standards. However, because residences are located close to the stadium, and because crowd noise, bleacher activity, and certain event-related sound sources cannot be fully controlled through feasible mitigation, stadium event noise may continue to result in substantial temporary increases above ambient evening conditions. Therefore, even with implementation of Mitigation Measure 4.3-2, stadium event noise impacts during intermittent high-capacity events would remain significant and unavoidable.

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None.

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None.

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10 ACRONYMS

AB	Assembly Bill
ADA	Americans with Disabilities Act
ADT	average daily traffic
B.P.	Before Present
BIA	Bureau of Indian Affairs
BMPs	Best Management Practices
BUG	backlight, uplight, and glare
CAA	federal Clean Air Act
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CALGreen	California Green Building Standards
CalRecycle	California Department of Resources Recycling and Recovery
Caltrans	California Department of Transportation
CARB	California Air Resources Board
CCR	California Code of Regulations
CDFW	California Department of Fish and Wildlife
Central Valley RWQCB	Central Valley Regional Water Quality Control Board
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFGC	California Fish and Game Code
CFR	Code of Federal Regulations
CHABA	Committee of Hearing, Bio Acoustics, and Bio Mechanics
CIF	California Interscholastic Federation
CNDDb	California Natural Diversity Database
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	CO ₂ equivalence
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
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
EPRI	Electric Power Research Institute
EV	electric vehicle
Farmland	Prime Farmland, Unique Farmland, or Farmland of Statewide Importance
FHWA	Federal Highway Administration
FMMP	Farmland Mapping and Monitoring Program
FTA	Federal Transit Administration
GHGs	greenhouse gases
GWP	Global Warming Potential
HCP	Habitat Conservation Plan
HVAC	Heating, Ventilation, and Air Conditioning
Hz	hertz
IDA	International Dark-Sky Association
IES	Illuminating Engineering Society
in/sec	inches per second
IPaC	Information for Planning and Consultation
K	Kelvin
KOPs	key observation points
LCI	Governor's Office of Land Use and Climate Innovation
LDL	Larson Davis Laboratories
L _{dn}	Day-Night Noise Level
LDR	Low-Density Residential
LED	light-emitting diode
L _{eq}	daytime average ambient noise level
L _{eq} [h]	A-weighted equivalent sound level
L _{max}	maximum level of noise
LOS	level of service
LRAs	local responsibility areas
LTA	Local Transportation Analysis
LZ-0	no ambient artificial light
LZ-4	high-intensity urban cores
McClellan Airport	formerly McClellan AFB
MLO	Model Lighting Ordinance
mph	miles per hour
MRZ	mineral resource zone

MT	metric tons
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NCCP	Natural Community Conservation Plan
NCIC	North Central Information Center
Nisenan	Miwok and Maidu Tribal
NO ₂	nitrogen dioxide
NOAA	National Oceanic and Atmospheric Administration
NO _x	nitrogen oxide
NPDES	National Pollutant Discharge and Elimination System
NPPA	Native Plant Protection Act
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
OPR	California Governor's Office of Planning and Research
Parkway Plan	American River Parkway Plan
Parkway	American River Parkway
PC	Parkway Corridor
PCZ	Parkway Combining Zone
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
PQP	Public/Quasi-Public
PRC	Public Resources Code
RD-4	Residential 4
RD-4/PC	Residential 4/Parkway Corridor
RMS	root-mean-square
ROG	reactive organic gas
SARA	Save the American River Association
SASD	Sacramento Area Sewer District
SB	Senate Bill
SCAQMD	South Coast Air Quality Management District
SFNA	Sacramento Federal Nonattainment Area
SLF	Sacred Lands Files
SMAQMD	Sacramento Metropolitan Air Quality Management District
SMUD	Sacramento Municipal 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
TAC	toxic air contaminant
TCRs	Tribal Cultural Resources
THRIS	Tribal Historic Information System
TMDLs	total maximum daily loads
training	Tribal Cultural Awareness and Sensitivity Training
UAIC	United Auburn Indian Community
USFWS	U.S. Fish and Wildlife Service
VdB	vibration decibels
VMT	vehicle miles traveled
Wilton Rancheria	Department of Cultural Preservation at Wilton Rancheria